

Submissions Received Issue 2
Park West Cherry Orchard
Draft Local Area Plan July 2019

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Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I work as [REDACTED] at Wheatfield Prison Education Unit. If this project is to go ahead, there will be a significant improvement in my day-to-day work life. Having this space to relax, exercise, converse with other staff and take part in social activities will vastly improve the health of the staff at the two prisons. Working in these environments is something which takes an emotional toll on the workforce there, so such a plan is very much welcome from me and other staff members at the prison.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

clover hill prison sports and social club

[REDACTED] employed at Wheatfield prison

Comment:

hello

am not sure of the Staff population at Wheatfield/ Cloverhill complex but it is quite large.

a big proportion of the staff who work there do shift work and a big proportion also work on a 12 hour rota, between October and March these people travel to work in the dark and travel home in darkness.

The things i see as a [REDACTED] there are on the dark spectrum and that is extremely mild compared to what the discipline staff experience on a day to day basis.

on their 1 hour lunch break many officers pile into cars and go to local parks and shopping centres to get a break from a very difficult environment, and to get a bit of sunlight.

If you account for the pollution from the cars and the cost to the public of the physical and mental health of this large group,.

Having a recreation space out of the prison building under the sky should provide a compassionate and cost effective public health resource.

However in regard to the Travellers site adjacent to the space. I am aware that there is an ongoing problem of pollution / burning of plastics and formaldehyde laden materials (from boilers) and possibly also batteries.

Animal rights infringements observed acts of vandalism and theft.

I feel that this needs to be logged by IPS staff and dealt with by the Garda.

I have been in touch with the EPA on numerous occasions regarding the Toxic pollution inhaled by staff entering and leaving the Wheatfield site.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports and Social Club

Comment:

I recently learned of plans to develop unused land around Wheatfield Place of Detention as a sports and recreation area for prison staff. What an opportunity!

I [REDACTED] in Wheatfield. Those who work in the Prison Service can appreciate how critical such a space is for their physical and mental well-being. Can you? Prison staff provide exemplary duty of care to their charges despite daily challenges and even risk to personal safety. The cumulative effects of physical and emotional stress on workers in a prison environment cannot be underestimated.

A place of respite offsite would be a "release valve" for high pressure duties and long hours of work. Help us to help ourselves maintain the highest standards of care. Give us a space to call our own. Our health and well-being may depend on it.

Thank you for your attention to this matter!

Sincerely,

PRISON STAFF – NAME REDACTED

Wheatfield

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Hello,

I have worked in both Wheatfield and Cloverhill Prisons for over 20 years. I believe the proposal to develop this area into a maintained, safe recreational area for the staff to use and exercise in is a great idea.

The area has not been developed

Comment:

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

I work as a [REDACTED] and also lead [REDACTED] in for the Prison services.

Comment:

We haven't got a practice place or such for the cricket team. If we could make that as net practice place for indoor and out door. Then we have a place to store the cricket equipment's. Have the training sessions as well.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

Please consider this group for the use of this unused land. Prison staff work in a very stressful and dangerous environment on a daily basis. We have for years been trying to get some area of land where we can get away from the prison for a walk\jog and is private and near enough to the prison to be used at lunch time. Also as a recreation area for a bbq or just lunch it would be a welcomed area to do so. We are stuck indoors for 12 hours a day on our shift and this area would provide a secure sanctuary to get outside for a break and therefore improving our physical and mental health in the process.

Attachment:

Not Answered

Name:

Cian Murphy

Organisation:

Comment:

To whom it may concern,

It is my view that, while it takes some positive steps, the draft Park West - Cherry Orchard LAP does not adequately address the housing, congestion, and climate crises ongoing in Dublin, Ireland, and the World. The creation of this plan presents singular opportunity to develop a high-density walkable suburb to Dublin, centred around public transport. It is important to seize this opportunity by discouraging car use as far as possible, and encouraging as much high density mixed developments as possible - the amount of low-density development in this plan is inappropriate.

As mentioned in the plan, the council should look at making streets more attractive for pedestrians and cyclists with wide, segregated cycle lanes and footpaths. However, the council should also commit to providing dutch style junctions, floating bus stops, and removing "slip roads" to improve cycling safety, and increasing the number of pedestrian-priority crossings, and reduce motor traffic speeds with traffic calming. I would like to applaud the mentioning of active frontage and building on in-fill sites, and commit fully to enforcing this style of construction in the area.

As further limitations to private motor vehicles, car parking should be limited where possible, and bus gates should be introduced where possible to dissuade through-traffic in the area. No park and ride facility should be provided at the station, as it would encourage unnecessary car journeys that could be far better served with feeder bus, and would use valuable land for development near the railway station - it is simply bad practice.

Finally, as a suggestion, building in the air space above the Kildare railway line (to the immediate East of the station) could be encouraged to enclose the entrance plaza to the station and develop a sense of place, alongside the high density development planned to the north of the plaza.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) -Land at 3a.

Comment:

I feel it would be hugely beneficial to the staff to have a green area where they can get fresh air, and exercise, or just relax away from the work environment. It would also mean that we would not need cars to travel to a green area for training at lunch time.

It could also be used for after work activities, such as memorial football matches and charity sports events.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

A recreation / exercise area on this land would be hugely beneficial for prison staff. As you can imagine, working in a prison demands a great deal from staff on both a physical and psychological level. Having a dedicated space where we could step out at lunch, take a break from the challenging prison environment and take a few moments to spend time in nature would do wonders for our sense of well-being. In addition, having some space to exercise is also crucial for those of us who sit at a desk job with a long commute on either side of our shift. I would greatly appreciate it if you would consider using this site for this purpose.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I am the [REDACTED] in Cloverhill Prison. I have been holding this position for the past 13 years. Prisons are one of the most difficult and stressful occupational environments I have encountered. Even as staff, ones "freedom" is significantly limited by the confined environment comprising of being constantly indoors, the high walls, numerous caged areas and security gates to traverse. The psychological stress of staff being constantly vigilant and having to regularly react to fights and other incidents involving inmates is significant.

This site is ideally located in close proximity to 2 large prisons IE. Cloverhill Prison (Ireland's busiest and only remand prison with an inmate turnover of approximately 5000 per annum) and Wheatfield Prison with approximately 600 sentenced prisoners.

It is my [REDACTED] that people employed in high stress custodial settings (eg. Prisons) require significantly more outdoor time/physically activity than people employed in "normal working environments" to maintain their mental and psychological health. This sites location is ideal for the staff working in both Cloverhill and Wheatfield Prisons and I do hope that Dublin City Council give serious consideration to the prisons application.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

It would be great to see the area turned into a park and recreation area for prison officers and staff in the Wheatfield/Cloverhill Prison. The prisons have a lot of staff and very limited space for them within the prisons themselves. I would very much be in favour for seeing the land turned into a place where we could exercise and enjoy the outside. As we spend so much time locked up ourselves on a daily basis. The knock on benefits would be great, as it would improve our health, morale and energy levels. We can then bring those positives with us to work and then hopefully pass them on to Prisoners.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I think this would be a massive benefit for the prison officers of Wheatfield and clover hill prisons for our physical and mental well being, the job can be very stressful and just a place to get some fresh air would have huge potential.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Having an area close to the prison that staff could use for recreation, to get some fresh air during the day and have an opportunity for exercise would be extremely beneficial for mental and physical wellbeing.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

With around 800- 1000 staff in the west Dublin prison campus, the plans put forward would be of huge benefit. Prison staff desperately need amenities close to the prison where they can go to exercise or relax that are close to the prison to go to on their break but also that takes them out of the prison walls. The rewards would be reaped for years to come

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill prison sports & social club (Irish Prison Service) Land at 3a

Comment:

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Hi

There are hundreds of staff working in the west Dublin prison campus. I feel this land when utilised correctly will be of enormous benefit to them both physically in terms of fitness and also positively towards the staffs mental health in the challenging environment that they face every day.

Attachment:

Not Answered

Name:

Mary Mac Mahon

Organisation:

On behalf of:

The Land Development Agency

77 Sir John Rogerson's Quay

Block 3

Grand Canal Docklands

Dublin 2

D02 T804

Comment:

Please see attached document

Attachment:

Avril Feeney,
Dublin City Council,
Planning and Development Department,
Block 4, Floor 3,
Woodquay,
Dublin 8

19 July 2019

RE: SUBMISSION TO THE DRAFT PARK WEST CHERRY ORCHARD LOCAL AREA PLAN 2019

Dear Ms. Feeney

1.0 INTRODUCTION

1.1 On behalf of our client, the Land Development Agency (LDA), 77, Sir John Rogerson's Quay, Block C, Grand Canal Docklands, Dublin 2, D02 T804, we hereby make a submission on the Draft Park West Cherry Orchard LAP (DPWCO LAP). We welcome the opportunity to contribute to the plan-making exercise.

1.2 The LDA have a particular interest in Sites 4 and 5, following a request from Dublin City Council to carry out a feasibility study for these sites. These feasibilities are being progressed at this time and will be presented to Dublin City Council for their review. The DPWCO LAP has been brought forward without sight of these studies, which have yet to be finalised. We would request that the following matters be considered at this point in time:

- That the estimated unit numbers and density of residential development in the DPWCO LAP be significantly increased;
- The indicative site layouts and massing diagrams are stated to be indicative only or removed;
- The ratio of commercial to residential development is removed from the sites;
- That Sites 4 and 5 are prioritised in terms of early delivery of housing.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI

Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MSc-ERM MAT&CP Dip EIA Mgmt. MIPI,
Stephen Blair BA (Hons) MRUP MIPI Mary MacMahon MSc TCP Pg Dip MSP Pg Dip Env Eng Dip Env Plg Law Dip Mgmt Dip EIA & SEA B Soc Sc MIPI

Associate Directors: Stephanie Byrne BA MRUP MIPI, Gerard Brennan BSc(Hons) MIPI, Niall Byrne BSc(Hons) MSc MRTPI MIPI

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Associate Offices:
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1.3 The sites and the estimated unit numbers are currently identified in Figure 1. This submission will consider the DPWCO LAP in terms of its wider strategic location; future public transport plans; Dublin City Development Plan core strategy, the National Planning Framework, the Eastern Midlands Regional Spatial and Economic Strategy and then matters relating particularly to Sites 4 and 5.

| Site | Use | Estimated Unit Numbers |
|---------|--|---|
| Site 1 | 100% Residential (with opportunity for crèche facility) | c. 200 new units (in addition to the 72 no. units on-site / under construction) |
| Site 2 | Residential including senior citizens accommodation and some local retail (3-4 shops) | c. 130 - 170 new units (in addition to the 77 no. units near completion) |
| Site 3a | 3a Enterprise / Employment Use | N/A |
| Site 3b | 100% Residential | c. 30 - 60 units |
| Site 4 | Predominantly residential, some mixed-use: Residential: 70% - 80% Enterprise / Commercial: 20% - 30% | c. 600 - 700 units |
| Site 5 | Predominantly residential, some mixed-use: Residential: 80% Enterprise / Commercial max. 20% | c. 120-180 units |
| Site 6 | Predominantly residential, some mixed-use: Residential: 80% Enterprise / Commercial max. 20% | c. 500 - 700 units |
| Site 7 | Mixed Use - Residential and Commercial c. 50/50 split | c. 400 - 500 units |
| Site 8 | Mixed Use - Residential and Commercial c. 50/50 split | c. 250 - 350 units |
| | | Total new units c. 2000 - 2700 |

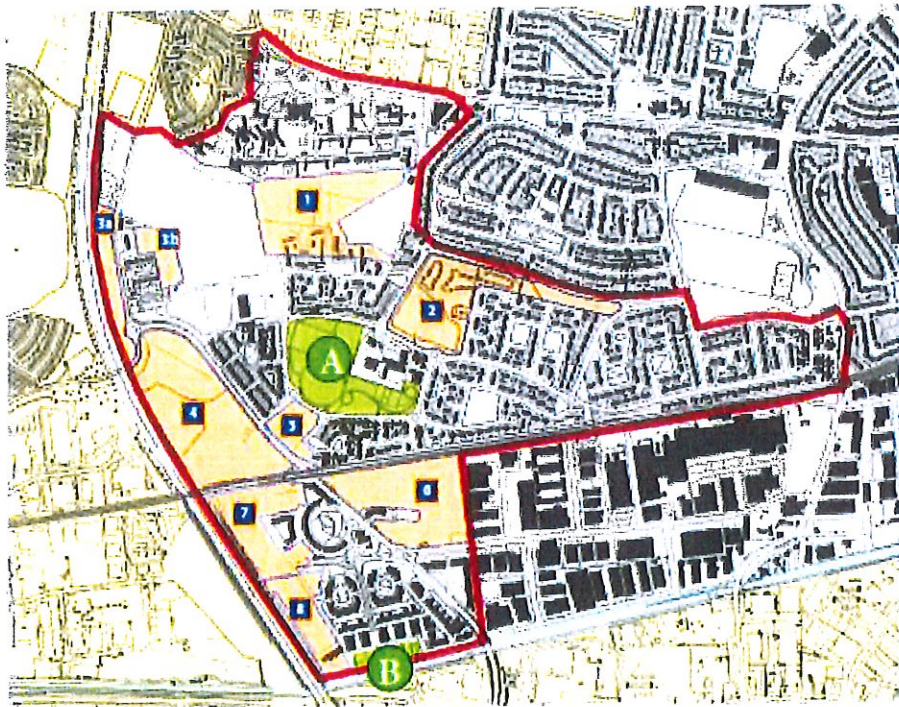


Figure 1: Extract from DPWCO LAP Pg. 41

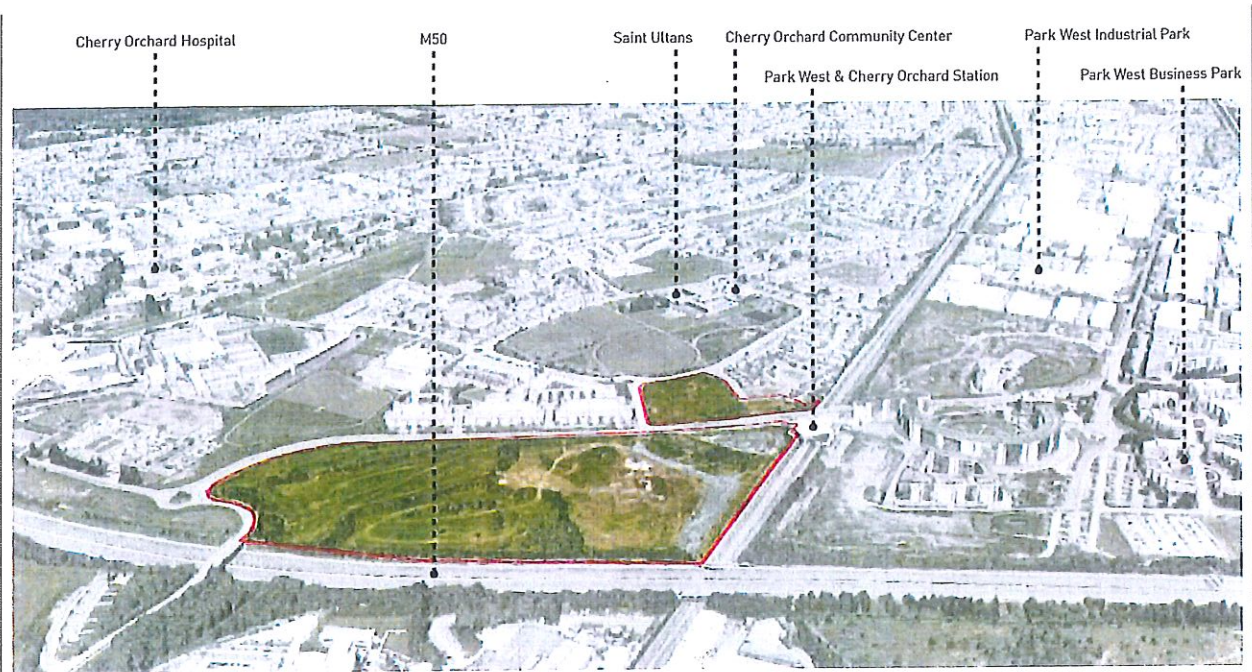


Figure 2: Sites 4 and 5 in local context. Source: Lafferty Architects

2.0 STRATEGIC OVERVIEW

- 2.1 The LAP lands are one of the last, large scale areas within the M50 ring to be developed. The undeveloped lands constitute approximately 46 ha¹. This represents circa 10% of the lands identified in the *Dublin City Development Plan 2016-2023* available for residential development. The plan notes that these lands can provide for 55,000 residential units. This equates to a density of circa 125 Dwellings Per Hectare (DPH). It is respectfully submitted that the target of providing 2,000 to 2,700 residential units², which would yield average densities of between 43 and 59 DPH, appears low in the context of Dublin City Council's core strategy. Densities being permitted on similar sites under current national policy are significantly higher eg. (Davitt Road, ABP 303433 permitted 321 DPH, Santry Road, ABP 303388 permitted - 253 DPH). In order to align with the current core strategy, it is respectfully submitted that a minimum residential target of 5,750 units should be stated in the LAP at a gross average density in the range of 100 to 200 DPH.

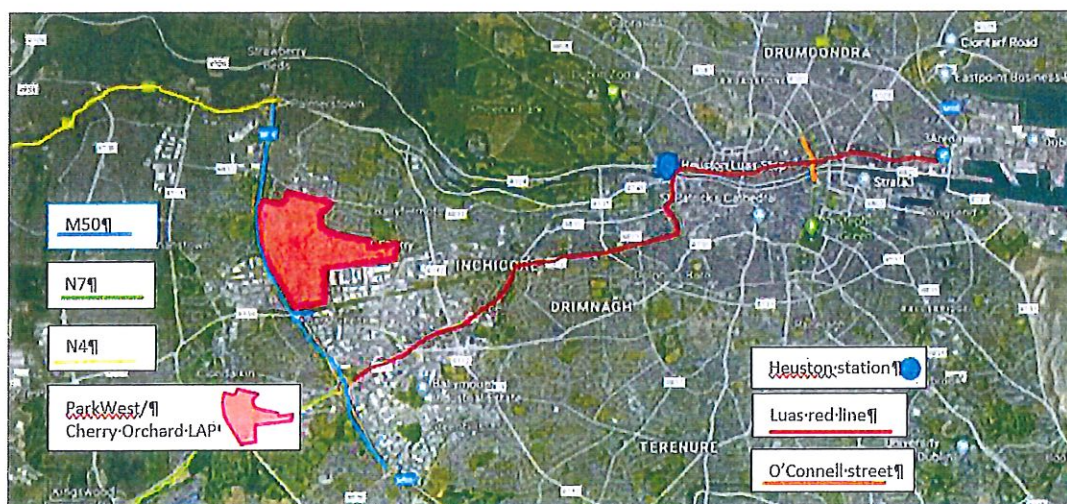


Figure 3: Park West and Cherry Orchard in city context. Source: Google Maps

- 2.2 Due to the publication of the *National Planning Framework* and *Regional Spatial and Economic Strategies*, the current City Council's core strategy is to be reassessed and population targets reviewed upwards. It is respectfully suggested the proposed density strategy be reassessed from a policy perspective and in the light of future public transport plans for the area. It would make sense to provide for additional population on sites in existing and proposed transport corridors, in Transport Orientated Development.
- 2.3 **EMRA Regional Spatial and Economic Strategy (2019)** anticipates that Dublin City and Suburbs will grow to 1.4 million by 2031. It expects that at least 50% of all homes in the EMRA region to be built within the built-up area of Dublin City and Suburbs. These homes should in particular be located at key nodes along high-quality public transport corridors. Park West and Cherry Orchard is such an area.
- 2.4 The area already has significant physical and social infrastructure in terms of its train station, roads, open space, social facilities and centres of employment. It is immediately

¹ DPWCO LAP 2019:1

² DPWCO LAP 2019:41

available for development and will support the accelerated delivery of housing, and so can be considered a Growth Enabler location.

2.5 Future Public Transport Provision: There is substantial public investment planned for public transport for the area, as set out in the *National Development Plan 2018-2027*. The provision of high-frequency electrified services on the Kildare Line, will significantly benefit Park West and Cherry Orchard Station. As €2 billion is to be invested in the heavy rail line network, there is an onus on ensuring that population densities reflect this investment, to ensure a return to the State. Furthermore the proposed Luas F Line is intended to serve Ballyfermot, as referenced in the National Development Plan. The assumption in the DPWCO LAP appears to be that this is a long-term proposal, as it cites the *Greater Dublin Area Transport Strategy 2016 - 2035*. However, given that the *National Development Plan* expects Luas F Line to be delivered by 2027, the LAP should provide for the opportunity to significantly densify this area as the opportunity will not present itself again within the timeframe of the *Greater Dublin Area Public Transport Network*.

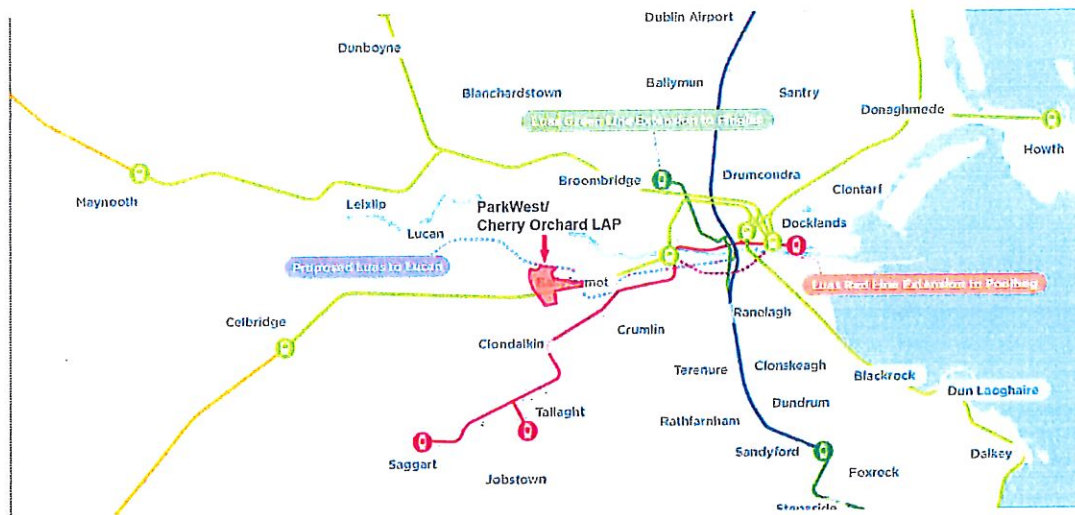


Figure 4: Greater Dublin Area Public Transport Network 2027. Source: National Development Plan

2.6 Bus Connects will also benefit the area. A high frequency bus route will link Liffey Valley to the city centre and there will be spur links from the LAP lands to this corridor.

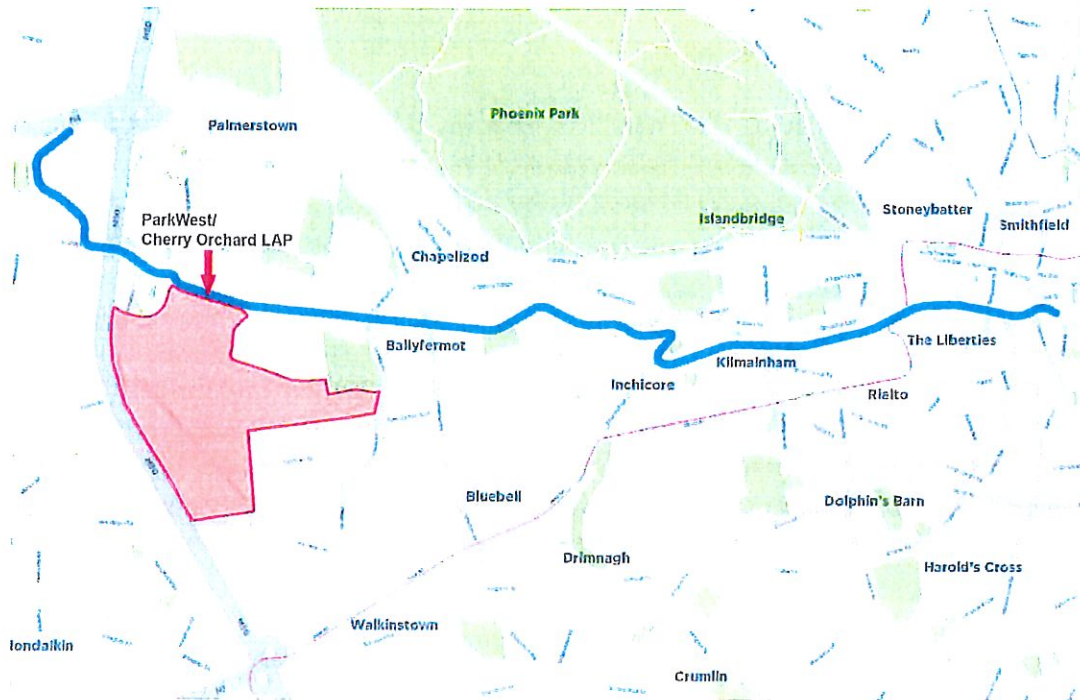


Figure 5: Proposed Upgraded Route Corridor. Source: Busconnects.ie

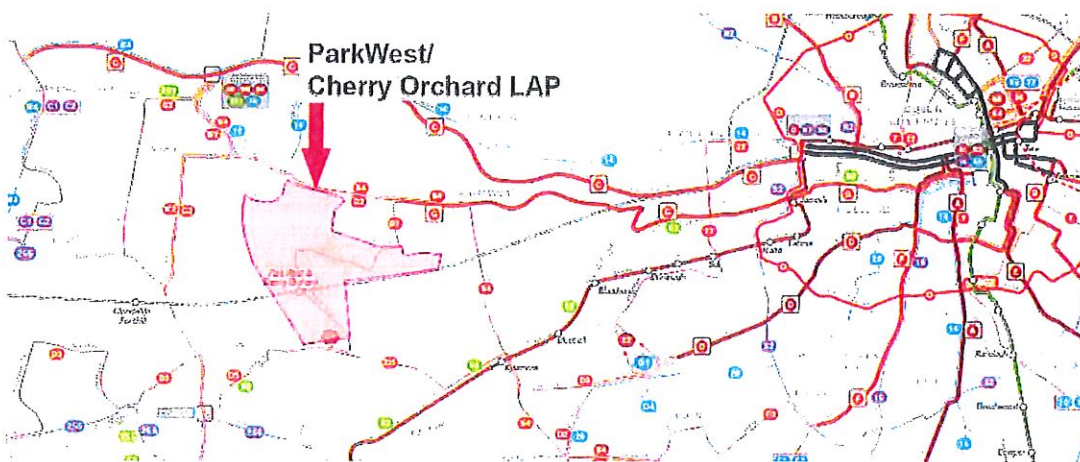


Figure 6: Proposed Bus Routes. Source: Busconnects.ie

2.7 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) identify where greater density of development is expected to be provided. Highest densities are to be located in Central and/or Accessible Urban Locations. These are sites within walking distance of significant employment locations, including hospitals. This relates to areas within reasonable walking distance (i.e. up to 10 minutes or 800m - 1,000m) to or from high capacity urban public transport stops, such as DART or Luas; and sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to or from high frequency (i.e. min. 10 minute peak hour frequency) urban bus services. These lands clearly fall into this category, given their proximity to Park West Railway Station and proposed Luas F Line. These distances are illustrated in Figure 7. Therefore, all the lands in the Draft LAP should be considered for high density development. This does not prevent a mix of housing typologies – rather that the area is suited for a higher population target than currently attributed to it in the DPWCO LAP.

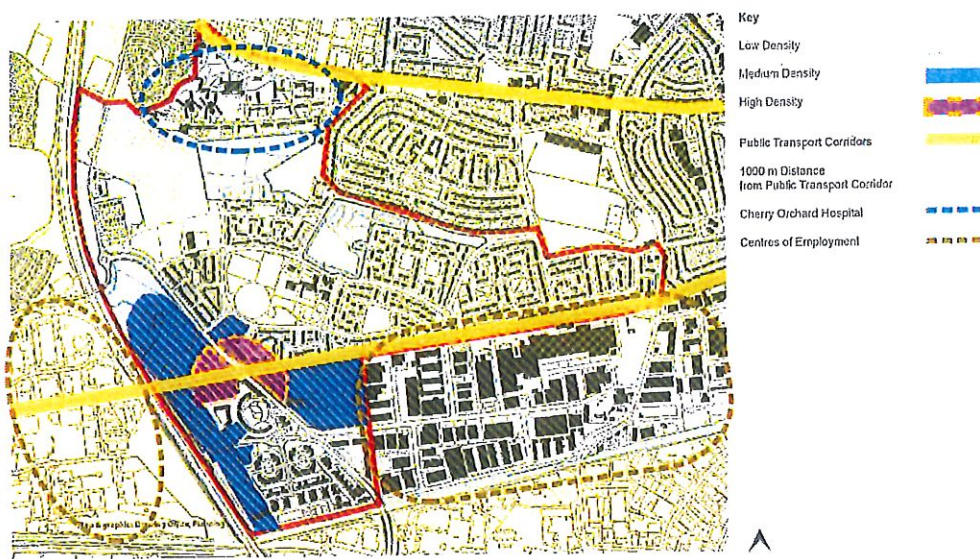


Fig 45. Proposed Density Strategy

Figure 7: Areas within 1,000 metres of the Kildare Railway Line and Luas F Line, close to Cherry Orchard Hospital and centres of employment Source DPWCO LAP

2.8 Urban Development and Building Height Guidelines (2018) state that *“the preparation of development plans, local area plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”*. We welcome that the DPWCO LAP is positively disposed in favour of height. It would be appropriate to highlight the indicative nature of these plans.

2.9 Transport Orientated Development (2019) NESC, considers how high-density development – housing, employment, public services and leisure space should be located around train stations and other transport nodes. This approach improves mobility and environmental conditions; makes for more efficient and sustainable urban development, reduces greenhouse-gas emissions and promotes decarbonisation. The report notes that higher-density TOD development can support housing affordability through lower unit land costs and by boosting housing supply. This benefits residents, who save on transport costs through lower reliance on cars while enjoying improved access to jobs and services. The NESC Report identifies the LDA as being strategically positioned to provide for affordable housing. The DPWCO LAP is generally reflective of the Transport Orientated Development approach. However high density in the DPWCO LAP is considered to be 125 DPH and applies to a very short distance from the train station. In contrast, the report recommends that the highest densities should apply to 400 metres from the train station. Copenhagen, described as the most liveable city in the world, has an average density of 175 DPH.

2.10 Recent court decisions have highlighted the importance of core strategies in development plans, local area plans and planning schemes and the SEAs underpinning them. (*Spencer Place Development Company vs Dublin City Council and Heather Hill Management Company CLG & Gabriel McGoldrick and An Bord Pleanála and Burkeway Homes Ltd.*) These plans are viewed as a contract with the people. Therefore, it is important that the targets and environment assessments take account of the upper end of projections, rather than the lower end. Furthermore, members of the public may assume

the indicative site layouts and massing models in the DPWCO LAP set the parameters for development on these sites and that any future application must comply with these parameters. This could give rise to difficulties in implementation in the future.

- 2.11** The plans need to be flexible to cope with new and emerging housing and commercial demands and have full regard for national policy. This is of particular importance at this time, as there is significant economic uncertainty at present due to Brexit. Brexit may result in significantly higher immigration levels to Dublin in the next number of years, due to increased employment opportunities and strong Foreign Direct Investment. Already the shortage of housing is a major issue for firms looking to expand in Dublin. Park West has been very successful in attracting a diverse population. It is a strength that can be built upon.
- 2.12** Given all the above, the DPWCO LAP represents a significant opportunity for high density development, close to employment and high-quality public transport corridors. The population targets for the LAP should be revised upwards, not least to the current City Council core strategy figures but higher again. It may therefore be appropriate to be less prescriptive in attributing capacity figures and block plans to individual sites in the finalised PWCO LAP. The absence of block plans in an LAP in no way inhibits third party comment at application stage; and this is probably the more appropriate time to assess the impacts of a considered and detailed proposed development.

3.0 SITE 4 M50 – CEDARBROOK AVENUE

| | |
|--|--|
| Site Area: | 11.5Ha |
| Ownership & Availability: | Dublin City Council owned and available immediately |
| Proposed Use: | Mixed Use: Predominantly Residential, with enterprise and commercial along the M50 and next to the Train Station. (c. 80/20) |
| Density | 75 DPH average (Ranging from 50 – 125 DPH) |
| Heights: | Ranging from 2-4 storeys up to 7-8 storeys (24m) in close proximity to Neighbourhood Centre and Train Station, with opportunity for place marker landmark building of up to 60m |
| Estimated Capacity | 600 – 700 no. units subject to detailed design. |
| Supporting Infrastructure Requirements: | Convenience retail to be provided. |
| | Possible park & ride parking for station. |

Figure 8: Extract from DPWCO LAP

- 3.1 This site adjoins the railway station. The entire site and Site 5 Barnville Neighbourhood site are within 500 metres of the station. These sites are Category 1 sites – Central or Accessible Locations. The DPWCO LAP however only recommends that some of the site is designated for high density development. The 125 referred to is only the average density of Dublin City's Core strategy. We request that this density be revised to state the minimum density on site should be 125 DPH. Feasibility studies being prepared for this site demonstrate that this density can be achieved while still providing a mix of housing typologies for the site. This will enable lower heights at locations where proposed development meets existing development.
- 3.2 We request that the high-density development is extended to cover the entire Draft LAP lands, in accordance with national guidelines.
- 3.3 Site 4 has been designated for mixed use development, with enterprise and commercial along the M50, at a rate of 80/20. It is not clear if this ratio relates to floor space or some other measure.

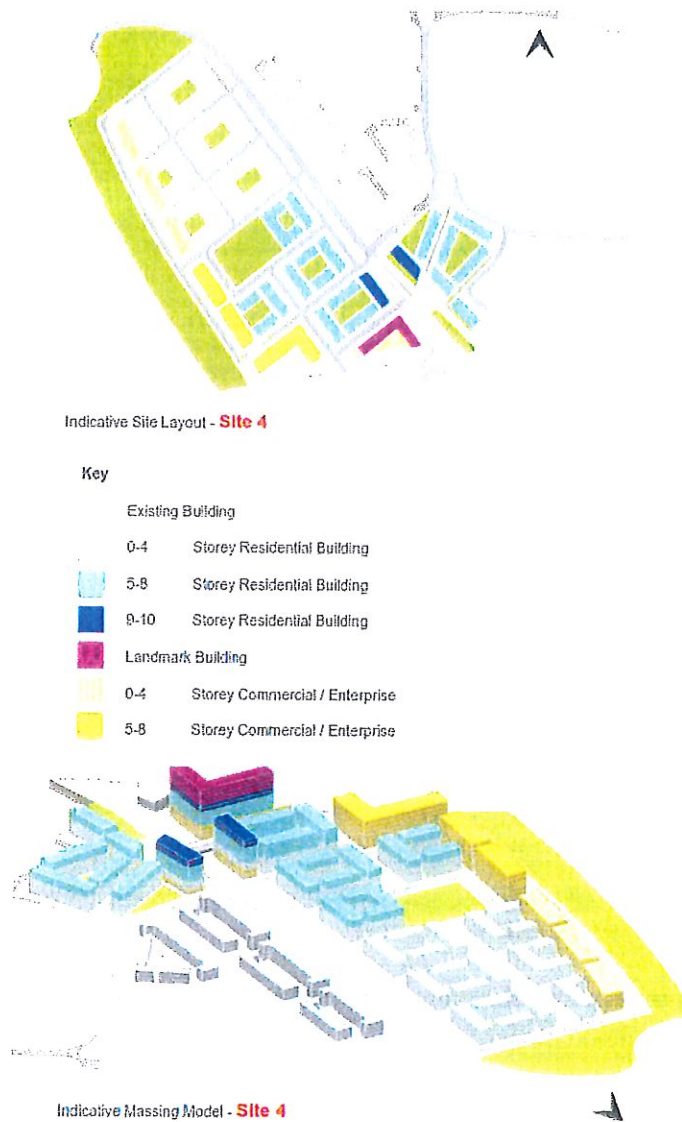


Figure 9: Extract from DPWCO LAP Pg 68

- 3.4 The massing model shows commercial development of potentially 8 storeys commercial along the M50. This may become difficult to implement, as recent planning history in the area has sought changes of use from existing commercial use to residential. In Park West, permission has been granted for change of use of existing vacant offices to residential use (see Reg. Ref. 3798/18 – Blocks 70 and 72). A similar permission was granted for Blocks 46 and 49 under Reg. Reference 3517/16. Site 3a provides for 120,000 square metres of commercial space. Given this proposed provision and the current absence of demand for commercial space in this location, we request that the 80/20 ratio reference be removed from the table for Site 4.
- 3.5 We consider that the location of the green park land adjacent to the M50 is positive and mitigates against the presence of the M50 for future residents by providing a buffer zone. Noise from the M50 may be mitigated against by way of noise barriers. NRA Guidance suggest that all proposals in respect of noise sensitive developments within the zone of

influence of such existing or of planned new roads, should identify and implement, where appropriate, mitigation measures in relation to noise. This would be an option for these lands, given that it would facilitate more of the site to be used for residential development.

- 3.6** The DPWCO LAP recommend that a Park and Ride and a supermarket be provided on site. This site or Site 5 might be equally suited for such uses and we respectfully suggest that the appropriate location for these facilities may be best left to detailed design, as a large floor plate is needed and access issues such as levels, proximity to the crest of the railway bridge, and minimisation of mixing of commercial and residential traffic etc, can be resolved.

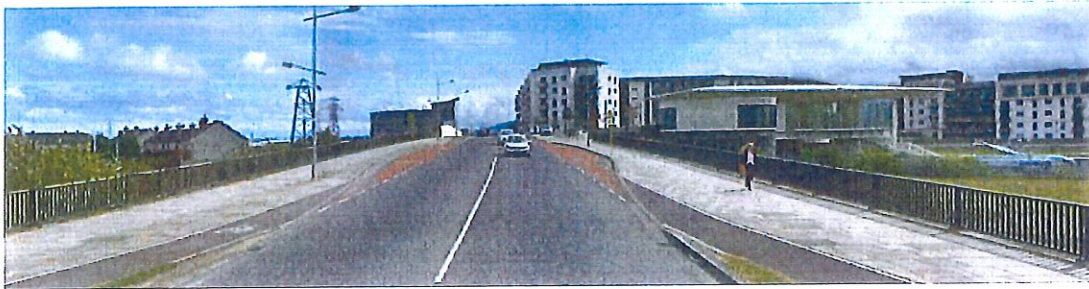


Figure 10: Levels issues close to Park West Cherry Orchard Station. Source Google Maps

- 3.7** Reference is made to replanting old field boundaries and retaining existing trees in a future central open space. Some of the existing tree lines follow the surface watercourses on site. It may be more appropriate to take a more planned approach to the design of the surface water system for the site, which provides for an ecologically sensitive system while maximising development space.
- 3.8** Figure 10 shows the benefit of a designed landscape west of the M50 – physically, and ecologically. We request that the reference to retaining the existing matures trees and hedgerows be replaced with a reference to the provision of a landscape approach which will soften the impact of the M50, shield noise barriers and maximise the future ecological potential of the site.



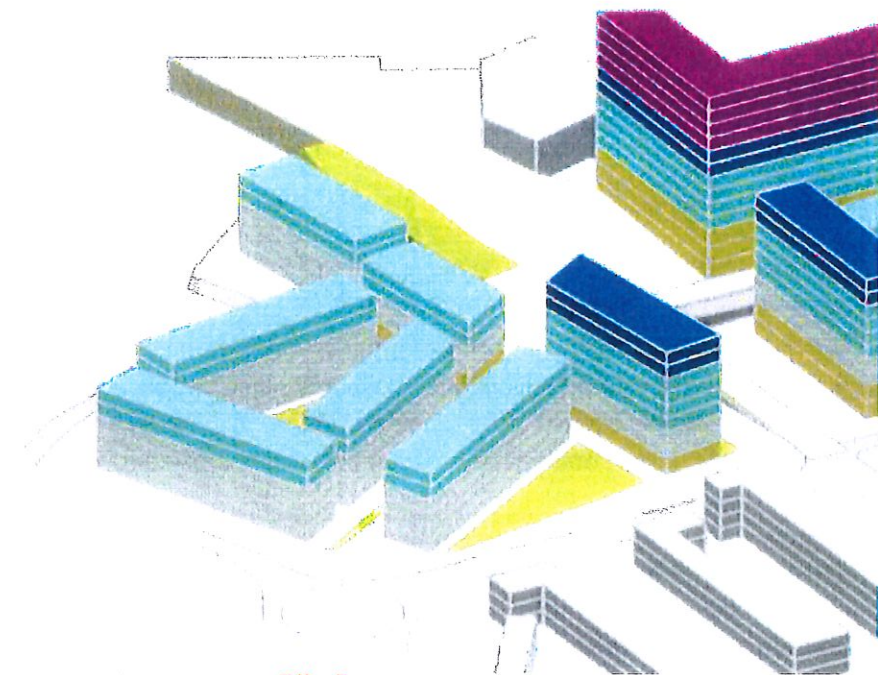
Figure 11: Planned versus self-seeded landscapes Site 4 on left hand side of figure. Source Google Maps

4.0 SITE 5 BARNVILLE NEIGHBOURHOOD SITE

| | |
|--|--|
| Site Area: | 1.5Ha |
| Ownership & Availability: | Dublin City Council owned and available immediately |
| Proposed Use: | Mixed Use – Predominantly residential with options for local retail and commercial uses (c. 80/20) |
| Density : | 100 – 125 DPH |
| Heights: | Ranging from 4-6 storeys up to 7-8 storeys. |
| Estimated Capacity | 150 -200 no. units subject to detailed design |
| Supporting Infrastructure Requirements: | Site to provide pedestrian access through site towards Train Station. Opportunity for civic space / civic plaza. (subject to detailed design) |

Figure 12: Extract from DPWCO LAP Pg 69

4.1 Again, we request that the 80/20 ratio be removed and the density set at a minimum 125 DPH. The block plan should be stated to be indicative or removed to allow for maximum flexibility in design. For example, greater height might be suitable facing onto the sports grounds, as shadowing would fall on open space.



Indicative Massing Model - **Site 5**



Indicative Site Layout - **Site 5**

Figure 13: Extract from DPWCO LAP Pg 69

5.0 PHASING

5.1 We welcome that the plan does not provide phasing. However, we note that there may be capacity issues in relation to foul water. We would therefore seek to develop Sites 4 and 5 as priority, to deliver homes for Dublin City Council.

6.0 CONCLUSION

6.1 This area of Dublin is suitable for high density of housing, which could be delivered within a short period of time. It is a Growth Enabler location. It is important for the plan to aim high in terms of population targets and to maximise flexibility, to enable high quality design and place making. This submission respectfully requests that housing targets and densities are increased; that block planning is omitted and instead reference is made to subject to detailed design and that no specific commercial / residential ratio is applied to Sites 4 and 5.

6.2 The area is well served by public transport and this will improve in the future. There are significant employment opportunities available locally and accessible by way of public transport. The area can provide for sustainable connectivity, minimising reliance on private car commuting.

6.3 The DPWCO LAP should be amended to significantly increase the estimated unit numbers and density of residential development; indicative site layouts and massing diagrams stated to be indicative only or removed; the ratio of commercial to residential development removed from the sites and that Sites 4 and 5 are prioritised in terms of early delivery of housing.

6.4 We respectfully request that the key opportunity that the subject lands represent for Park West and Cherry Orchard should be fully acknowledged and supported by the new LAP.

Yours faithfully,



John Spain Associates

Name:

Aideen Foley

Organisation:

NO. In my private capacity as a resident only.

Comment:

See attached document.

Attachment:

Comments on the Local Area Plan- draft- for Parkwest/Cherry Orchard.

Aideen Foley

I welcome the publication of the Parkwest-Cherry Orchard LAP and the public consultation that has been invited on it.

Personally, I have lived here in [REDACTED] for 15 years and am raising 2 children here. I have seen it make extraordinary leaps forward over that time, in terms of the infrastructure, the maturity, the density, the employment levels and the community spirit, but it still feels like a dormitory in many ways. Few people work in the area. Most people commute to somewhere else to do that. Nobody shops in the area, because there is nowhere to do that. It isn't a town, it doesn't have a centre, so everyone goes to Ballyfermot to socialise and to feel like they are part of somewhere. I see neighbours living in hugely overcrowded conditions in an effort to keep family out of homelessness. I see children out all the time without adult supervision, because there just isn't space in the house, and there isn't the childcare to take the children after school while parents work. I would like to see the area function better for the people who live here. I would like to see it providing employment, training, shopping, leisure, exercise and community opportunities for everyone, including the demographic bulge of children and young people currently living there.

At a high level there are a number of points that I would like to make on the plan and more detailed comments are included further below.

- The plan is laudable in its ambition, and as a resident who moved here in 2004, during a previous, ambitious but unrealised LAP, I desperately hope that the promised services are finally delivered.
- Despite the mentions of green and active access routes, the car is still king in this latest LAP. The plan to increase the porosity of the area for walking and cycling lacks ambition and should be stepped up.
- Communities are surviving and in some cases flourishing, in spite of the lack of ongoing maintenance put into the area.
 - Simple things like road sweeping, cutting undergrowth along paths and cutting down on parking on footpaths would make cycling and walking a safer option.
 - The single playground is poorly maintained.
 - Policing anti-social use of scramblers, quadbikes and loose horses in the park would automatically increase the amount of safe space for children to play and for others to walk and exercise.
 - The council does a good job of collecting burnt out cars quickly, and addressing fly-tipping in the area (the fence erected around site 4 is an example of this). More enforcement and more public information about successful prosecution of litter law infringements would lead to more compliance.
- Good quality cycling infrastructure (segregated cycle paths, swept regularly and maintained and Sheffield stands in useful areas with passive monitoring from overlooking shops and housing) would transform the area.
- Mature trees are important for making the area feel lived in, cared for and presentable- again trees are planted and then abandoned without any apparent follow up or maintenance.

I am not going to criticise the heights proposed in the plan, as I feel that for services to be delivered there does need to be increased density in the area. However I would observe that if 9 stories is too high to be regularly built in the city centre core (which already has higher average buildings than

Cherry Orchard's 2 storey houses) then why would the Council seek to escalate the density so dramatically in Cherry Orchard?!

Canyoning Cherry Orchard – Park west.

I would encourage anyone to walk from the train station to the plaza in Parkwest and experience what a canyon feels like. There is nothing at ground level but empty retail units on one side, and fast moving cars on the road. The ground is frequently littered with broken glass. On the far side of the road there is a welcome congregation of smokers outside the Hotel to remind you that humans exist here, but then little evidence of people again until you navigate the pedestrian un-friendly roundabout in the direction of the Plaza, where again the car is king and there is no sign of humans at ground level, simply an entrance to an underground carpark. It feels hostile, beautifully manicured, but not of human scale and prone to anti-social behaviour. I would like to see the new developments under the LAP have home entrances at or near street level, with retail and community services interspersed. High blocks of apartments that have no street level interaction, even if overseen by apartments above, will suffer from the same fate as the current infrastructure in Parkwest, which is vandalism and making the streetscape feel unsafe. Could we have doorways, shops, benches, planters, cycle paths, well thought out junctions instead?

From the point of view of Children/families

While the Plan has a section discussing the need for localised safe play in the plan I would point out that often in new developments green spaces are seen as green areas for residents to look at, rather than being areas for children to be active in. Children's play space has to be designed into the plan right from the beginning, if access to space is to be safeguarded. Dog fouling on green areas is a significant barrier to children's play, as are adjacent busy roads (think of balls rolling under cars etc).

The existing playground is usually covered in glass, poorly maintained and frankly intimidating given the magnet effect it has on unsupervised large groups of older children.

A playground was originally planned for Site 7, over in Park-West but was not delivered. Given the high level of children living in the development, it is sorely lacking. Most children have very limited play-space in Parkwest. When apartments are built around a green space, but access to the basement is easier than the green space, children will end up playing in the basement instead, with safety repercussions. Parents need to be able to let children out into play spaces that are overlooked by living accommodation, for good supervision and in order to ensure that anti-social behaviour does not develop.

Consideration has been given to the inclusion of another school in the area. It is not clear whether this will be another primary school, or a secondary school- both of which are needed. Many children currently travel up to Lucan to access a primary multi-denominational education, as there is no educational diversity available in wider Ballyfermot, never mind Cherry Orchard- this is yet another reason for car dependency in the area.

Children have to be able to move safely around the area in order to encourage less car use and more active travel. The lack of safe crossings, along with the high number of vans and cars that park semi-permanently along the footpaths in Cherry Orchard and around the train station makes it much less safe for children to walk or cycle.

Childcare places are largely ignored in this plan. Employment increasingly relies on ability to access dependable affordable childcare- especially for single parent households, of which there are huge numbers in Cherry Orchard (for example, between 42 and 48% of households in Cedarbrook were

headed by single parents in the last census). Despite central government moves to improve the range of supports for parents requiring childcare, the lack of availability of childcare in the area is striking. There are three sizeable facilities in the areas (Giraffe in Parkwest, Babes in the woods in Cedarbrook and the Community Childcare crèche on the far side of Site 2) and they are all over-subscribed and have waiting lists. End-to-end childcare in an area like Cherry Orchard with limited public transport links to employment areas are rare, and failure to provide for current and future demand will ensure a continuation of low work intensity households- you will engineer it into the area if you are not careful. After school services are even more limited, as I found out when looking for a service for my own children- I now commute out of the area in order to access services (another car journey!).

Shopping- or rather the lack thereof.

The plan mentions a large convenience store near the train station, and some light retail opposite St. Ultans. Cherry Orchard has some very economically disadvantaged areas contained in it, and those people deserve the opportunity to access good quality affordable food. This is not provided by a convenience store, but by affordable supermarket provision. This is desperately badly needed and would go a long way to cutting down on the amount of unnecessary car travel out of the area on a daily basis. Area convenience stores are useful, for a loaf of bread, or to provide area services such as parcel collect for couriers, but what is really lacking is a decent budget supermarket.

The nearest supermarket to the train station is Lidl on the Ballyfermot Road (1.9km). Others are Lidl nangor road 2.5km, and Aldi 2.6km away. For a population that only has access to a small convenience store (Tommy's on Cherry Orchard Avenue) this is a long way to walk.

There is existing unused retail provision in Parkwest, both in the plaza and along the road to the plaza from the train station. There is an existing convenience store about 650m away from the train station in Parkwest. There appear to be planning permissions submitted/granted? to change these into additional residential units.

Discussion of the Plaza as an amenity for residents is nonsensical. Shops are closed after 8pm at night and at weekends and it is too far to walk there from most of Cherry Orchard. The operating hours make it clear that these services are only considered to be for the use of the workers in the office/industrial park and not for local residents.

Leisure time- go outside the area

There is not one pub in the area, nor any place for the congregation of people. The bar in Parkwest closed down about 8 years ago and was a big barn of a place- it attracted anti-social behaviour. Even when it was open it was a significant walk for most of the area, and a desolate walk at night. A local pub that people could walk to and walk home safely from would be a significant addition to the area. Consideration should be given to adding space for one, even a small one, somewhere that would attract quiet business.

The suggested landscaping of the park is a welcome one. However landscaping with no follow up maintenance is a waste of money- please keep coming back to fix things that get broken and replant. Unsupervised or unused facilities will simply be vandalised- there needs to be some community presence in the area that feels responsible/ownership for those facilities.

Public Transport- infrequent, try the car!

Cherry Orchard is more reliant than other areas on the car (according to the last census). This is easy to see on a daily basis, when trying to cross the road to the train station, where a constant stream of

traffic seeks to get into Parkwest in the morning, and queues to get back out in the evening. Every road out of Cherry Orchard has traffic jams on it at morning/evening rush hour. The current plan does not offer solutions to this car dependence, although the planned road through site 1 may offer some relief.

The lived experience: Porosity in the area is poor- It is bounded along one side by the M50, along another by the railway line and the combination of the prison and the cherry orchard hospital campus creates a cul de sac effect on the Palmerstown side. Cherry orchard acts as a conduit for car traffic, often travelling at speed to a distant location, with little regard for the needs of the communities they travel through. We are, in effect a rat run with parkwest at one end, and services/shopping in Ballyfermot and access to commuting roads at the other.

The modelling of the distance that people must walk to a bus stop leaves much to be desired. It is probably technically true that much of the area is within 5 minutes of a mode of public transport, but for much of the more remote parts of the area (up near the train station), the frequency of a bus service, even at peak times, is every 30 minutes. And if you switch to the train, there is a good commuter service in the morning that is already reaching capacity, but throughout the rest of the day there is one train every 30 minutes.

Those residents that do not have access to a car are disadvantaged further in accessing services in surrounding areas. There is only one public transport accessible supermarket (Tesco, Ballyfermot) and that the trip over to the Health Centre on the Ballyfermot road is a very time consuming business involving a change of bus (79/a-40), if you cannot walk the couple of kilometres from the train station down to the centre.

Dublin City Council Planners at public meetings referred to it being outside their remit to get better transport provision, that this must be done by residents lobbying transport companies themselves. If Dublin city Council want to build ~2,000+ units of accommodation in an area with little current transport, then the problem is theirs to help solve. It is not good enough to simply tell residents that they must manage the Tsunami of traffic that the Council plans will bring into the area.

While the LAP cannot address the lack of frequency of Bus Services up to the furthest corners of Cherry Orchard, it can design an infrastructure that is conducive to a more frequent service being viable and provided- prioritising public transport routes through the area at the expense of private motor cars, and better promotion of active modes of transport (including proper, consistent policing of pavement parking and providing good quality cycling facilities).

Currently the traffic (on all modes) is one way (out of the area) in the morning and back in the afternoon and evening. Bus routes are not regular enough that you can rely on them, and they frequently simply do not turn up. Anything that cuts down on the need to use a car to move out of the area should be pursued. The higher densities of housing will also bring a need for an increased bus service but this should be planned for now.

Cycling and walking

The porosity of the area for walking and cycling is also poor. The plan signals an intention to increase walking and cycling bridges across the railway line and making efforts to open up the back of the hospital site in the future. These are welcome additions and should be pursued, but more needs to be done and more urgently, to get people out of their cars.

As Cherry Orchard is a relatively low density area, and the area covered by the plan is relatively large, the logical move is towards cycling. I used to cycle to work in the city centre, but have abandoned this

in recent years, as I feel increasingly vulnerable as a cyclist. Cars travel very quickly, on the same shared road space as I do in Cherry Orchard. Glass abounds on roads that are rarely swept and cars and vans are often parked fully blocking footpaths in the area, forcing pedestrian out onto the road, and making it difficult to cycle safely with children. The alternative is the green cycle way along the canal which is regularly a venue for anti-social behaviour. A spate of cyclists being knocked off their bicycles (in order to steal those bicycles) coming across the parkwest bridge some years ago was the final nail in the coffin for me with cycling. Nonetheless, I would like to be able to cycle with my children safely in the area, rather than getting in my car for every small thing. For this to happen I need safe, segregated cycletracks, properly planned junctions, priority for cycling factored into the planning stage of this LAP, good quality Sheffield stands at key locations- supermarket, healthcare services, schools, train station, key transport interchanges etc. These bicycle parking places need to be overlooked by people, not blank walls in order to ensure that bicycles will not be vandalised or stolen.

As a pedestrian, with children I am struck by not having anywhere to walk to. I can walk to our park, but must leave if I hear scrambler bikes. The playground is poorly maintained, often covered in glass and vandalised. Loose horses in the park are a lesser menace, but probably not good for any sports infrastructure the council plans on putting into the park. I cannot walk to a shop. My children automatically go to the car when we leave the house. Please give the next generation an opportunity to avail of active transport modes, by default, rather than the car dominated desert we currently live in.

If you build the infrastructure and maintain it, it will be used, appreciated and will be there to build upon in future years.

Include the arts- things that have worked in Cherry Orchard

The live work units mentioned for site 5- could consideration be given to having live-work units for artists? This would bring people working in the arts into an area that has very little sight of the Dublin arts scene and custom built live-work units with studios attached in an affordable area would offer artists a chance to develop further. Community drama initiatives in Cherry Orchard have been quite successful- time to try a different artistic medium?

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I think this piece of land given over to Cloverhill Sports and Social club for development, will benefit staff on the Cloverhill/Wheatfield campus.

Attachment:

Not Answered

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I feel this area would benefit the lives of the workers in Cloverhill and Wheatfield Jail in many ways. One of the biggest benefits would be to our mental health. Working 12 hours is a long day and to have a park/green area to relax, take a walk or jog during our lunch break would help our physical health as well as our mental health. To get away from the stress of prison and to be able to get to a park/green area and "just chill" in a friendly environment would I feel improve the health, mental and physical, of prison workers and indeed of any public member who uses this facility.

Attachment:

Not Answered

Name:

Councillor Sophie Nicoullaud

Organisation:

I am sending this submission as Ballyfermot-Drinnagh Green Party Councillor

Comment: Please see attached

Attachment:

Sophie Nicoullaud
Green Party Councillor Ballyfermot-Drimmagh
The Richard O'Carroll Room
City Hall
Dublin 2
sophie.nicoullaud@dublincity.ie

21st of July 2019,

Submission for LAP Cherryorchard Parkwest

The vision

“Come and visit Cherryorchard where less than 10 km from the heart of Dublin City you can ride a horse on proper horse trails, go for a short hike on proper trails and buy organic produces. And even better you can live there with nature at the bottom of you apartment building.”

This LAP is totally lacking vision. Vision is what is needed to lift up up the place, to promote the community . There is no sense of place in this LAP. The only way this old and new community will thrive is by giving it a sense of place. The environment where one lives is extremely important for someone’s mental health so let's give this place what it deserves.

The vision here is to bring this area its traditional agricultural identity back, promote and look its tradition of horse ownership and amalgamate the two with compact, sustainable urban living with A rate buildings.

This LAP must be a model when it comes to sustainable living. It must be a world example of comprehensive planning for biodiversity and ecosystem services focusing equally on both (Planning for the Future of Urban Biodiversity: A Global Review of City-Scale Initiatives. BioScience. 67. 332-342. 10.1093/biosci/bix012.). This LAP must be an example for forwarding biodiversity and sustainability goals. All goals and objectives in this LAP must include quantitative targets.

This LAP must be built with passive building standards. All Constructions within the LAP must adopt the Irish Green Building Council Green Building certifications (<https://www.igbc.ie/certification/>)

I am asking Dublin City Council to remember that is LAP is to prepare for the a liveable and healthy future for all. I am asking Dublin City Council to remember that the young population of today will,be for the majority, the ones raising families there. Our young population today from all walks of life are demonstrating with consistency in Dublin asking our governments to stop global warming and to create environments that are healthy for all living species.

I am asking DCC to remember that research show that the youth is not interested in buying and owning cars anymore. I am asking DCC to remember that our population in

Ireland will grow and that there will be little space for cars in our cities: London understand the situation and is building new construction without providing car parks.

People in Cherryorchard and Parkwest live with or surrounded with some of the highest rates of and among others:

- unemployment
- suicide
- incarceration in prison
- mental health problems
- low level of education
- drug addictions
- obesity

These people need an environment with the least negative impact on their well-being. We can greatly help to reduce these issues, which are linked to the surrounding environment , by creating healthy environments, where people will love to live because it feels good.

I am asking that this LAP including every one of its sites, reaches each and everyone of its Environmental Protection Objectives and that when reached the objectives are maintain. I am asking that the frequency of reporting must be augmented to be on an yearly basis.

With regards to Biodiversity, Flora & Fauna, this LAP must protect and “enhance the diversity and range of habitats, species and their resources within the LAP area.”(SEA p.73)

With regards to Air Quality & Noise, this LAP must maintain and “improve the good acoustical quality for the current and future residents of the plan area.”(SEA p.73)

With regards to transports, this LAP must reduce traffic levels by making “the modal change from car to more sustainable modes of transport such as public transport, walking & cycling.”(SEA p.73)

With regards to Landscape & Soils/Geology, this LAP must protect and “enhance the character, diversity and special qualities of Park West –Cherry Orchards’ landscapes and soils.”(SEA p.73)

With regards to population and human health, this LAS must create a sustainable compact city in which to live, work and/or visit (SEA p. 113)

With regards to water, this LAP must comply with EU Water Framework Directive to ensure and maintain good ecological status of all receiving water in the LAP area. This LAP must reduce and manage the risk of flooding. It must provide adequate wastewater treatment, water distribution and drainage networks (SEA p. 114)

With regards to climatic factors, this LAP must keep emissions of greenhouse gases to a strict minimum to be become free of dangerous emission level(SEA p. 114)

With regards to material assets, this LAP must To reduce the generation of waste and adopt a sustainable approach to waste management.(SEA p. 114)

With regards to cultural heritage, this LAP must protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded monuments, architectural structures, materials and urban fabric) and man made landscape features.

Infrastructure and services

Phasing

Infrastructures need to be up and running first. Such infrastructures as water and drainage provision, public transport and telecommunications network need to be in place and in working order before any other construction takes place. This is one of the key principles of the LAP, unfortunately it doesn't say that these infrastructures will be put in place first. Instead we have a vague:

"ensure timely provision and investment in infrastructure"(3.2)

"The RSES supports the coordination and re-intensification ...to... ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects."(1.3.2)

Again, this doesn't give us any certainty that infrastructures will be in place and in working order prior to start any other construction work. For this LAP and any other LAP to work, we need to be given the certainty that the infrastructures will come first with words such as " must have" instead of "support" or "ensure timely provision".

Phasing is key to this LAP like any other LAP. Paragraph 6,3 we read that

"The supporting infrastructure such as surface and foul drainage upgrades / water supply upgrades, utilities upgrades, new roads / bridge links, along with the requirement for new community infrastructure such as sports, Educational, recreational facilities are all identifying as key outcomes and items of infrastructure which the Planning Authority seek to achieve in the redevelopment of areas across the Plan lands" (6,3)

These above infrastructures need to be in place first and in working order prior to start any other construction within the LAP and this needs to be clearly written down for anyone to understand. We need to achieve and not "seek to achieve".

As it stands now , this paragraph 6,3 is blurry and does not indicate any timeframe clearly. What we have is :

"It is the intention of the LAP to be a flexible workable framework document and to respond to the evolving needs of the community and market forces. "

This is very worrying to see that the framework document for this LAP is intentionally to be flexible to respond to the need of marker forces! This allows for the economy to collapse again and for this LAP and DCC to not be held accountable!

We live uncertain times. Brexit may happen within three months, we may see a general election within three months and the Irish economy is overheating at present. This is enough to scare anyone of the uncertainty to secure public and private investment.

Water system:

The people need the certainty that the LAP will:

- provide adequate wastewater treatment, water distribution networks and drainage networks and including for all sites.(SEA p105)

Groundwater:

People need the certainty that:

- The LAP will take the necessary measures to deal with the groundwater high vulnerability on the land adjacent to the M50 and the moderate vulnerability within the majority of the LAP. (SEA p. X)

Proposed surface water drainage infrastructure:

People need the certainty that:

- there is additional surface water infrastructure in order to service the identified development sites (4.10.1)
- a survey is carried out to “determine if the existing surface water infrastructure is adequate to serve the both the existing and future surface water volumes.” (4.10.1)
- DCC obtains a “good status” for the River Camac Catchment area under the Water Framework Directive and that it will support its implementation. (4.10.1)
- DCC will “implement best practice Sustainable Drainage System features in order to reduce the volume and increase the quality of outflow from the public open spaces and roads (4.10.1)
- DCC and this LAP will “allow for Surface Water Management Protection of existing watercourses and the reopening (re-lighting) of covered or culverted watercourses as part of all new development e.g. Gallanstown Stream, Blackditch stream and Galback streams”
- DCC and the LAP will “build further resilience into the surface water drainage network through the provision of an additional surface water sewer crossing under the railway tracks, or as may be required to support future developments subject to detail design.”

Flood risk management :

People need the certainty that:

- “The requirements of ‘The Planning System and Flood Risk Management – Guidelines for Planning Authorities’ (2009),” will be implemented “in order to ensure that flooding within the Plan Lands does not impact on human health, property, the ability to meet the requirements of the EU Water Framework Directive, or the need to protect biodiversity” (4.10.2)
- the proposed measures stipulated under the headings of water and air & noise of the SEA to significantly reduce the probability of surface water flooding will be taken (SEA, p. XVI)
- the risk of flooding will be reduced and managed on every site (SEA p. 105)

Foul drainage infrastructure:

People need the certainty that

- as noted by Irish Water in their submission that there will be “a new large capacity foul drainage outlet to facilitate the development of the LAP lands” (SEA, p. 11)
- “A survey” will “be carried out to determine if the existing foul drainage infrastructure is adequate to serve both the existing and future run off volumes. (4.10.3)

Water Supply:

People need the certainty that Irish Water and/or DCC:

- will comply with EU Water Framework Directive to ensure and maintain good ecological status of all receiving water in the LAP area including every site. (SEA p. 105)
- will upgrade “Some of the existing older watermains (1950s/1960’s)” if needed considered needed. (4.10.4)
- INF1: will “upgrade the existing surface water and foul drainage systems to relieve potential constraints in the existing drainage systems and to future proof the drainage infrastructure required to support the full development of the LAP lands.”
- INF2: will “upgrade the existing potable water supply network to future proof water supply to support the full development of the LAP lands.”
- INF3: will implement “the Water Framework Directive for the rehabilitation of the Camac River .”
- will implement “best practice SuDS infrastructure throughout the LAP lands in order to improve quality and control of outflow to the river Camac from the LAP land.”

- INF4: will “upgrade the existing combined drainage systems to provide separate storm and foul drainage networks”

Air, Noise

People should have the right to breath clean air. People need the certainty that levels of air pollution are not in breach of any EU limits and the WHO Air Quality Guideline before any construction takes place. People need the certainty that an environmental scenario analysis will be put in place to assess the prospects of all developments within the LAP. People need the certainty that this scenario analysis will “provides an approach to reflect on and think through the possible implications of alternative decision pathways in a structured manner, bringing to bear expert knowledge and stakeholder perspectives.” (<https://www.peer.eu/projects/metier-training-courses/course-7-environmental-scenario-analysis/>). People need this environment scenario analysis to clearly show pathways to be adopted, especially when it come to transport ,in order to maintain low level of air pollution when all projects within the LAP are in place and the LAP has reach full capacity.

The SEA mentions that :

“The main threat to air quality in Park West –Cherry Orchard comes mainly from the transport sector in the form of oxides of nitrogen, PM10and PM2.5. “(page IX)

People need the certainty that emissions of PM10and PM2.5 will be reduced and people need DCC to show us a concrete plan showing the shift to sustainable modes of movements and transport. People need to see solid studies showing how DCC in this LAP will move away from the private car to public transport options to reach and maintain low air pollution.

This LAP is adjacent to the M50. We learn from the last EPA report that air pollution by nitrogen dioxide (NO2) along the M50 is the worst with frequent breaches of EU limits due to large volume of traffic (<https://www.epa.ie/pubs/reports/air/quality/>) . We learn from an Irish Times article that the highest concentrations of NO2 are withiin 10 metres of the road side (<https://www.irishtimes.com/news/environment/dublin-air-pollution-breaching-eu-limits-epa-warns-1.3950575>). High level of NO2 have concerning health impact, respiratory illness and asthma, particularly for children and older people.

NO2 levels on the M50 and within 10 meters of the M50 roadside are exceeding EU limits. We learn from the LAP SEA Environmental Report that:

“The concentration of NO2 and particulate matter 10 (PM10)... levels increase dramatically when one is less than 100m away from the road centre-line...”

People need the certainty that DCC will prepare an air quality action plan and intervene to reduce emissions to protect the population in the LAP against air pollution.

People need the certainty that the LAP will be a low emission zones.

People need the certainty that creating a "park and ride" facility within the LAP will not increase air pollution from polluting vehicles. It seems not right to let commuters from outside the LAP to drive polluting vehicles through the LAP and park in the LAP to get on the train.

DCC and this LAP must:

- "AN1 protect good air quality status and minimise all forms of air pollution (i.e. Nitrogen oxides & Particulate Matter). (p XIV, SEA) including on every site
- AN2 maintain and improve the good acoustical quality for the current and future residents of the plan area."(p XIV, SEA) including on every site
- take the necessary number of mitigation measures "to prevent, reduce and as fully as possible offset any adverse environmental effects if there are found to be any adverse impacts as a result of implementing the LAP. " (p. XVI)
- take the proposed measures stipulated under the headings of water and air & noise to significantly reduce noise and air impacts from car travel.
- Provide air quality monitors for this LAP
- Reduce "excessive driving speeds through the provision of appropriate traffic calming measures/ urban design principles."(p.35)
- Provide pedestrian and cycle linkages
- Provide high-density development to reduce non-sustainable means of travel
- Provide a detailed noise and air assessment for development proposals adjoining the M50 and railway line, along with detailed mitigation strategy to reduce harmful effects. (SEA p.35)
- provide a modal shift from the private car to high quality public transport walking & cycling and on every site
- "Maintain air quality status and meet value targets for named pollutants in line with Air Quality Framework Directives."(SEA p. 76) with a year frequency of reporting.

Site 3a is not fit to house humans because of high air and noise pollution because of the M50. DCC must :

- provide evidence that all sites and mainly 3a, 4 , 7 and 8, are fit to be developed for human for enterprise and employment without being affected by air pollution.
- provide evidence that all sites and mainly 3a, 4 , 7 and 8 are fit for humans without being affected by air pollution while working, living or studying there .

Biodiversity

This LAP must take into consideration that "Pressures on biodiversity potentially arise as a result on an increased commercial use..."(3,3,9) and that in 2019 when the economy is a step from reaching bust point, an entire office building lay empty in Parkwest.

"The enhancement of biodiversity, preservation of natural amenities, integrity of wildlife corridors and protection of the natural environment are all important issues ..." (SEA, 3.3.1 p18)

We learn from the SEA that:

"much of the natural and semi-natural area of Park West and Cherry Orchard has been replaced by artificial surfaces associated with buildings and development (residential, office, instructional uses, roads etc.)". Much of the LAP area is covered in hard surfaces associated with buildings (residential, office, institutional etc)(SEA, p. VIII) The parks in the LAP have mowed grassland as the dominant features with no or limited shrubbery for ground floor cover and some have young trees.

People need the certainty that this LAP will

- protect and "enhance the diversity and range of habitats, species and their resources within the LAP area." (SEA, p.XIV)
- face up to "the challenge for the LAP to balance the need for improved multi-functional areas of open space that have recreational and amenity uses alongside the need to promote opportunities for biodiversity" (SEA, 3.3.5 p22)
- Enhance existing open space areas and develop a connected network of green spaces and green infrastructure to maximise their potential use by the existing and future generations.
- Create long walking trails, cycling trails and horse riding trails as a strong alternative to hard surfaces (https://www.irishtrails.ie/Sport_Ireland_Trails/Publications/Trail_Development/A_Guide_to_Planning_and_Developing_Recreational_Trails_in_Ireland.pdf)
- enhance biodiversity
- control the threats to biodiversity from Nuttall's waterweed and Japanese knotweed
- make sure that contractors working for the Council comply with The 'Dublin City Invasive Alien Species Action Plan 2016-2020'
- improve biodiversity by at least providing three key "Green Corridors"
- create new parks / open spaces as part of the development of the available sites, linking into the green network (SEA, 3.3.8 p. 26)

- “enhance the biodiversity value of the local area by protecting habitats, in particular historic hedgerows (Site 4) and along the Canal, and create opportunities for new habitats through appropriate landscaping schemes to integrate the natural environment into the existing and future urban environment”(SEA; 3.3.8 p.26)
- improve “planting and biodiversity value of existing parks and in particular the existing Cherry Orchard Park.”(SEA, 3.3.8 p.26)
- “ensure that all new streets are appropriately landscaped and tree lined and where feasible seek the upgrading of existing streets to incorporate landscaping, appropriate tree planting and SuDS features” (SEA, 3.3.8 p.26)
- “work in collaboration with all stakeholders including the National Park and Wildlife Service, Waterways Ireland and South Dublin County Council to protect and enhance the Grand Canal Green Corridor which is designated as a proposed Natural Heritage area.”(SEA, 3.3.8 p.26)
- protect the Grand Canal, a proposed Natural Heritage Area (SEA, 3.3.9)
- with regards to wastewater treatment, put mitigation measures in place to protect water quality and associated ecological impacts in Dublin Bay (SEA, 3.3.9)
- with regards to construction sites, put mitigation measures in place to protect watercourses and existing flora and fauna from localised pollution (SEA, 3.3.9)
- not lose relevant habitats species or their sustaining resources as a result of implementing the LAP (SEA p. 76)
- have all streets to be tree-lined and that the number of new trees planted in the LAP will be reported on a yearly frequency (SEA p. 76)
- provide New local parks and upgrade of existing park and that the No. of new parks provided/ upgrade to Cherry Orchard Park and other local parks will be reported on a yearly frequency(SEA p. 76)
- Survey and monitor bird population, distribution of bat populations, extent and distribution of invasive species and evidence of recorded Protected Species and will be reported on a yearly frequency (SEA p.76)
- will choose for a minimum standard alternatives recommended within the SEA on the topics of “biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors”. (SEA 6.2 p.83)
- “protect and enhance the diversity and range of habitats, species and their resources within the LAP” area on every site (p. 101)
- create biodiversity hot spots around the community garden in order to function for food production

High voltage

People must have the certainty that this LAP and the responsible department will:

- INF5: lay underground existing high voltage overhead power lines and pylons in Barnville and throughout Park West. (SEA p. 121)

Urban agriculture

This LAP must introduce urban agriculture as a strong alternative to the supermarket concept create to support automobile ownership to tackle transport carbon foot print. It needs to be introduced as a strong alternative for residents to get and consume healthy produces to tackle the poor food quality and to recreate the link between what we put in our mouth and where it is supposed to come from to tackle junk food addiction. Urban agriculture must be introduced at a high level to create much needed employment.

People must have the certainty that this LAP will :

- provide enough land for organic urban agriculture to make a positive contribution to tackle food carbon foot print.
-
- Not take any land away from the existing community garden.

Green infrastructure

« Much of the LAP area is covered in hard surfaces associated with buildings (residential, office, institutional etc).Grassland either mown or wild is the most common type of wildlife habitat. »(3,3,5)

« The challenge for the LAP is to balance the need for improved multi-functional areas of open space that have recreational and amenity uses alongside the need to promote opportunities for biodiversity. »(3,3,5)

Does seem to me that the challenge is far from being addressed.

« The Dublin City Development Plan includes policies for the protection and enhancement of biodiversity, flora and fauna and it aims to strengthen the recognition of green corridors 26under the Habitats Directive. »(3,3,8)

« Objective to enhance the biodiversity value of the local area by protecting habitats, in particular historic hedgerows (Site 4) and along the Canal, and create opportunities for

new habitats through appropriate landscaping schemes to integrate the natural environment into the existing and future urban environment »(3,3,8)

“Pressures on biodiversity potentially arise as a result on an increased commercial”(3,3,9)
July 2019, entire building is empty so why build more commercial building causing threat to biodiversity.

Transport

People must be certain that prior to any new resident moving in that

- the transport hierarchy puts walking first, cycling an all soft modes of transport(including horse riding) second and pubic transport 3rd.
-
- Provide for car share clubs and public bicycles and scooters
- an electrified DART line to serve the Park West – Cherry Orchard train station will be provided by the responsible department (Cn1, 1.2)
- the LAP is well served by public transport (ch 1, 1.3)
- Heavy Rail provisions including the DART Expansion programme which identifies the provision of fast, high-frequency electrified services to Park West - Cherry Orchard and onwards to Celbridge/Hazelhatch must be enhanced (Ch.1, 1.2.3)
- Light Rail provisions including proposals for new LUAS line linking Dublin City Centre to Lucan, via the Ballyfermot Road must be enhanced
- the following bus routes are up and running :Bus Connects Radial Spine Route (Route G): The G spine is based on a combination of existing Routes 40 and 79/a in inner West Dublin. Southern Orbital Route (Route S4): The S4 Orbital Route would extend from Liffey Valley southeast through Ballyfermot, Kylemore, Crumlin, Terenure, Rathgar, Milltown, and Clonskeagh to end at UCD.
- A detailed cycle network with primary, secondary and greenway elements as part of the continued roll out of NTA Cycle Network Plan for the Greater Dublin Area is provided because a number of these routes pass through the Park West, Cherry Orchard and Ballyfermot Area
- at the local level walking, cycling and public transport, with new development fully permeable for walking and cycling and providing filtered permeability for private vehicles, that is, with access available but restricting or discouraging through trips must be provided.(ch1, 1.2.2)
- must provide for an integrated public transport system, with bus and commuter rail as the main components.

- Must provide a high quality intergrated public transport network system, and a permeable and safe environment
- must enhance accessibility and connectivity both within the Park West - Cherry Orchard area and to the surrounding areas to service the remaining development sites
- must provide sustainable modes of transport by making them convenient and attractive (including walking and cycling) through the implementation of a well connected, permeable, coherent street network with high levels of accessibility to an integrated public transport network with improved infrastructure to maximise its potential use.

Amenities

People must have the certainty that:

- enough school capacities from primary to secondary level will be planned ahead of residents moving in
- facilities for social enterprise and small and medium enterprises must be provided.
- Necessary local physical and mental primary care will be provided
- youth outdoor areas will be provided in accordance with the result of a survey that ask what they want.

Horses

As noted in paragraph 4.7.4 in chapter 4, Cherryorchard has a tradition and culture of horse ownership. Better consideration must be given to the horses and their owners. This is a great opportunity to create a sense of place for this LAP. The horse must be given an important place and DCC must pay attention to horse welfare by designating a site that will benefit to the animals. The horse must play a central role: this is unique to have a culture of horse ownership in a capital city and this needs to be cherished. If we want horses to be looked after , DCC has to play its part as a facilitator. This is a unique opportunity and people would come to visit a place so close to city center where horses have a great life and have horse trails: this makes for a great opportunity to set up a small scale social enterprise for a horse recreational facility to attract people, to add Cherryorchard on the list of places to visit in Dublin.

noise and air issues:

The site 3a has been found unfit for development of residential uses because "the air and noise pollution concerns were too great " (SEA, p. XV). This site 3a would expose horses to high levels of air pollution and noise pollution. There are some anecdotal evidence of mares having abnormal foals when they live in close proximity to major roads (noise stress

/air pollution), but no hard evidence exist. Horse are sensitive to noise (<http://www.bhs.org.uk/~media/bhs/files/pdf-documents/access-leaflets/noise.ashx?la=en>)

This may not be a good idea to use the site for an equine facility as a "non-noise sensitive uses along the M50, i.e. commercial uses including office and enterprise uses." (SEA p.35). horses require specialist training to deal with traffic noises, crashes/horns as well as the constant hum. Barriers and vegetation to lessen the noise would be required if they are put in this space. Too much noise can stress horses.

isolation of the site:

I would be concerned about convenience:

Horse owners need to keep an eye on the horse especially at night but because site 3a, horses would not have anyone to raise the alarm in case of emergency. Plot 3A relies on the travellers raising the alarm alone and they might not even see anything depending on placement.

Size of site

The SEA reminds us that :“this site is a long relatively narrow strip of land buffering the M50”(SEA p.95)

Horses training needs a minimum of a 35m radius for bends and turning so I would wonder about the width of the site. There was no scale provided.

Shelter or stable

It appears that for most of the year in Ireland horses will do fine outdoors as long as they have a rug in colder weather and stables are best for severe weather, but shelters (wooden & vegetative) might suffice for majority of time.

This could be a viable alternative to building stables. We want to make sure that this proposed equine facility thrives and that young owners will be able to manage the cost of running this equine facility. Wooden and vegetative shelters could be the affordable alternative which would offer good ventilation as well.

People must have the certainty that this LAP and DCC will:

- protect animal's welfare.
- Protect horses from noise exposure and pollution that may affect their health.
- provide a safe environment where people will be able to keep an eye on the facility 24hours.

- come up with a more suited alternative for a horse facility. The new alternative must be closer to where owners live for them to keep a eye on the horse's security. I
- keep this site 3a fully to remain a green belt from the M50. DCC must enhance this site to become an effective green belt. The halting site to the east of it the closest residential place to the M50 and a green belt in front of them will protect its residents from high exposure to traffic pollution.
- Create horse trails

Name:

PRISON STAFF – NAME REDACTED

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I think the land being used by prison staff would be a great idea for physical and mental health. it would also clean up the area with trees and loads of activity in the not used area

Attachment:

Not Answered

Name:

Austin Gill

Organisation:

Comment:

I welcome plans to develop the Park West and Cherry Orchard areas. It is badly needed however i am concerned that the necessary transport infrastructure is not going to facilitate such a large scale development. I also object to the height of the buildings around the Cedar Brook estate and believe any houses/apartment should be at the same level as Cedar Brook. I would be concerned that given the current demographics in the area the high rise development could cause ghettos to develop which would be a concern as no Garda station is included in the plan.

I think there needs to be more in the way of open spaces for walks and more planning in the way of bio diversity. It seems the plan has more of just build so many apartments to deal with housing crisis rather than trying to create a nice community.

Attachment:

Not Answered

Name:

Anne Fitzgerald

Organisation:

Ballyfermot Chapelizod Partnership

Comment:

Good Afternoon

Attached please find attached the submission on behalf of the Cherry Orchard Development group with regard to the LAP for Park West - Cherry Orchard.

The CODG reflected in depth on the proposed draft plan and while welcoming much of it have concerns in relation to the social infrastructure and support for same in the plan.

The CODG's view based on their local insights and experience is that the LAP would have good support locally if the marking Cherry Orchard Better Plan, which was first ratified by the DCC area committee in 2017 was fully resourced financially and implemented prior to the commencement of any building works. Members of the CODG require a meeting with the planning section of DCC to discuss their submission at your earliest convenience.

Anne Fitzgerald

on behalf of the CODG

Attachment:



Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath



**Ballyfermot
Chapelizod
Partnership**

'Building an inclusive community'

Cherry Orchard Development Group Submission on the Draft Park West –Cherry Orchard Local Area Plan

Executive Summary

The Cherry Orchard Development Group (CODG) ¹ welcomes the Draft Local Area plan for Park West- Cherry Orchard and the invitation to submit observations and suggestions. While supportive of the LAP for Cherry Orchard there are a number of areas of concern with the current plan which we will set out below.

There are elements of the draft local area plan which we support, for example the inclusion of new retail units for the area, which has been brought up as a need for the area at various consultations.

In preparation for the Making Cherry Orchard Better Action Plan, considerable consultation with the local community was undertaken and as such, it was felt the plan had community buy in. The Action Plan focused on the social issues in the area, including policing, education, employment and training, all of which were identified as the key issues for the area by the community itself and key stakeholders. The Plan was ratified by the DCC local area Committee in September 2017. The plan called for modest investment in a social plan for Cherry Orchard for a 5 year period at a cost of €534,000 PA. To date DCC and DRCD have invested between them €200,000 in 2018 and 2019. This valuable support has provided key support to implement some parts of the Making Cherry Orchard Better Action Plan, however given the shortfall in funding the major aspects of the plan have been unable to commence. This has led to considerable frustration in the local community.

¹ The following agencies/groups are members of the CODG; TUSLA, Ballyfermot Chapelizod Partnership, DCC, Community Reps, City of Dublin Education and Training Board, DEIS Schools, Park West Business Reps, An Garda Síochána Ballyfermot. The group is chaired by Brendan Foster, partner in Grant Thornton and former President Dublin Chamber of Commerce and former Chairman of Dublin City Council Audit Committee.

The inclusion of c.2000-2700 new housing units in the draft local area plan is a cause of great concern for members of the Cherry Orchard Development Group. Many services in the area are already under extreme pressure, for example childcare services and early education facilities to meet existing service needs of families. A large population increase in the area without enhanced service provision will impact on service provision to existing families.

We believe that the social infrastructure plan as identified in the Making Cherry Better Action Plan is not currently in place to cater for almost three thousand new homes and the families who will occupy them. There is a danger of repeating past mistakes by introducing new families without the services to cater for them.

Proposal:

- It is our belief that if the Making Cherry Orchard Action Plan is supported by the Local Area Plan, and is fully implemented before the commencement of building works there will be considerably more community buy in to the proposals set out in the Local Area Plan.
- We propose that the Making Cherry Orchard Action Plan is supported on a statutory basis and that the CODG receive backing and resources for the plan.
- We stress the need for social infrastructure, prior to the introduction of additional housing to the area. This includes community facilities, education, childcare, policing, family support, and employment initiatives etc.
- We request that two members of the Cherry Orchard Development group are invited to join any forthcoming DCC area implementation group.

1. Background

1.1 Cherry Orchard Development Group

The Cherry Orchard Development Group has overall responsibility for the delivery and implementation of the Making Cherry Orchard Action Plan, and has an input into all actions. It consists of representatives from Ballyfermot Chapelizod Partnership, Dublin City Council, Tusla, An Garda Síochána, City Of Dublin Education and Training Board, Cherry Orchard Community reps, Local Schools as well as members of private enterprise in the area. All of the above have been identified as key stakeholders.

1.2 Making Cherry Orchard Better Action Plan

After extensive public consultation, the making cherry Orchard Better Action Plan was published in 2017.

The aim of this area action plan is to provide a framework for the renewal of Cherry Orchard and its community. It was prepared by Dublin City Council in conjunction with the Ballyfermot Chapelizod Partnership. The area continues to experience severe social, economic and physical problems, which require an inter-agency response to address these ingrained issues. However, the area has a very strong sense of community and there is a keen desire amongst all stakeholders to make Cherry Orchard better.

The preparation of this plan has involved extensive consultations with government agencies and Departments, non-governmental organisations (NGOs) and the community itself. The issues have informed the vision for the plan, which is:

To create, at its heart, a content, caring and vibrant sustainable community, which caters for the employment, community and environmental needs of existing and future generations.

The vision is articulated around six pillars, which are fundamental to the well-being of the community. Overarching principles are required to underpin the six pillars and provide a framework for the development of specific actions:

- Pillar 1 Institutional and Governance: To ensure that systems and processes adopted reflect the interests and inputs from the local community and secure the implementation of the actions of the plan.

- Pillar 2 Community and Citizenship: To support active citizenship, equal opportunities and social cohesion.
- Pillar 3 Policing and Safety: To create a partnership between all relevant agencies and community members to promote safety in the area.
- Pillar 4 Education: To support participation in education and life-long learning to allow all in the community to realise their potential.
- Pillar 5 Employment and Training: To break the cycle of unemployment, making individuals job-ready, attracting jobs and economic activity, thereby improving the opportunities of the community.
- Pillar 6 Built Environment: To enhance and create a good quality environment in which people are proud to live, work and play.

1.3 Policy and Statutory Context

Despite being non-statutory, the actions contained in the Making Cherry Orchard Action Plan are consistent with higher level policy. The action plan has due regard to the Dublin City Development Plan 2016-2022 and the Dublin City Local Economic and Community Plan 2016-2021.

2. Cherry Orchard Development Group - Response to Local Area Plan

As part of the consultation process we outline our views in the following paragraphs.

The group is supportive of the local area plan and feel that it is largely in line with what is set out in the Making Cherry Orchard Better Action Plan.

2.1 Housing

The Cherry Orchard Development Group note in particular the considerable number of houses that are planned for the area, as outlined in chapter 4 of the Draft Local Area Plan. While the Cherry Orchard Development Group acknowledge the need to utilise vacant space, Cherry Orchard is an area where serious challenges persist. Any additional homes will require additional resources. While reference has been made to the infrastructure that is needed including transport and green infrastructure, we stress the need for social infrastructure also.

- At present the childcare services in the area are already under considerable pressure and the primary school is already at full capacity. With the additional of c.2000-2700 new housing units, most of which will include young families, additional resources in childcare and education will be essential
- Anti-social behaviour, including the use of scramblers in green spaces persists in the area currently. The number of gardaí in the area will need to increase substantially
- We acknowledge also that a certain number of residents will include people who have been in temporary accommodation and will require support once they have moved into their new home e.g. family support, access to employment etc.
- The area would need additional recreational and community facilities to meet future demands given that current needs are unmet and an increase in new families will put existing services under severe pressure

2.2 Social Enterprise

The Cherry Orchard Development Group is particularly supportive of the inclusion of the community and social enterprise hub in the Local Area Plan.

Social Enterprise was identified in the plan as a priority for the area. Since the plan was launched in 2017 a full time social enterprise innovator has been employed to facilitate the growth of social enterprise in the area.

The Social Enterprise Innovator role is to identify, build, support and guide social enterprise culture in the Ballyfermot Cherry Orchard area. They provide assistance to local community groups who wish to develop income streams by helping them carry out research, feasibility studies and prepare business plans. They also build effective working relationships with existing Social Enterprises in the catchment area, evaluating capacity and developing support plans where required

2.3 Location of Community and Social Enterprise Hub

In the consultation period, the site within Cherry Orchard Park was identified as the area which would best suited for an incubation space. This is in line with the policing and safety pillar of the Making Cherry Orchard Better Action Plan and will promote safety in the park.

2.4 Provision of retail space

The provision of retail space is an issue that was frequently raised during the consultation process and since the plan was launched. This is something that the group sees as a necessity, particularly as the number of residents in the area will be rising considerably in the coming years.

2.5 Point of Clarification

We refer to the map on page 46. We note the boundary of the community garden may be moved for the purposes of widening the road. We seek clarification on this matter.

Brendan Foster

Independent Chair CODG

July 16th 2019