

**Submission**

*On the*

**Draft Regional Spatial and Economic Strategy for the  
Eastern and Midlands Regional Assembly**

*On behalf of*

**The Jackson Family**

**To**

*Eastern & Midland Regional Assembly  
3rd Floor North, Ballymun Civic Centre  
Main Street  
Ballymun  
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**January 2019**



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## 1.0 INTRODUCTION / EXECUTIVE SUMMARY

- 1.1 On behalf of our client, the Jackson family, c/o Goodrock Project Management Limited, Newtown House, Newtown, Eadestown, Naas, Co. Kildare, we wish to make a submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Authority (RSES). This submission builds upon the pre-draft submissions made on behalf of our client in February 2018.
- 1.2 Our client owns a significant landholding within and adjacent to the Kiltiernan / Glenamuck LAP, a significant extent of which is not zoned for development at present, including zoning objectives F – Open Space and B – Rural and agricultural use. As noted in Appendix 1 and illustrated in Figure 1, our client has secured permission for Phase 1 of 49 no. dwellings under Reg. Ref.: D17A/0793, (advanced stage of construction) and Phase 2A of 5 no. units, under Reg. Ref.: D18A/0566. An application for Phase 2B of 57 no. apartment units is currently under consideration by An Bord Pleanála under Reg. Ref.: D18A/0940 and ABP Ref.: 303324/18.

**Figure 1 – Extent of our client's landholding**



- 1.3 We have reviewed the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Authority (EMRA) and welcome the positive framework set out in the Strategy for consolidating growth within the Metropolitan area and providing for increased population targets. It is noted that the RSES must be consistent with the objectives of the National Planning Framework (NPF), including a target population of 1.4 million people in Dublin City and Suburbs for 2031, an increase of some 220,000 people, and a target of 1.65m. in the MASP an increase of some 250,000 people.

- 1.4 As outlined in the pre-draft submission, the Dun Laoghaire Rathdown County Development Plan 2016-2022 does not zone an adequate quantum of residential lands required to meet the population projections, as set out the in NPF and draft RSES. In view of this, and the NPF and Draft EMRA RSES objectives, we wish to respectfully submit policy recommendations which support the zoning of land for additional residential development in Dun Laoghaire Rathdown in order to cater for the sustainable and compact growth of Dublin City. The inclusion of recommendations in the RSES relating to the need to zone additional lands in suitable locations in Dun Laoghaire Rathdown for residential development, will facilitate the consolidation of urban development, and achieve regional and local housing target allocations in an approach consistent with Government planning policy (NPF).
- 1.5 It is respectfully submitted that our client's serviced lands, which are currently zoned for rural and agricultural use, are suitable to accommodate additional population growth in a sustainable manner being located adjacent to the Kiltiernan / Glenamuck LAP area and in proximity to the Luas line and public transport.
- 1.6 In addition, this submission suggests that the RSES should recommend that planning authorities take a tandem view to the zoning of lands (i.e. the tiered approach recommended in the NPF), which allow for improved planning in respect to the zoning of land and the delivery of infrastructure and public transport, and greater certainty for both planning authorities and landowners.

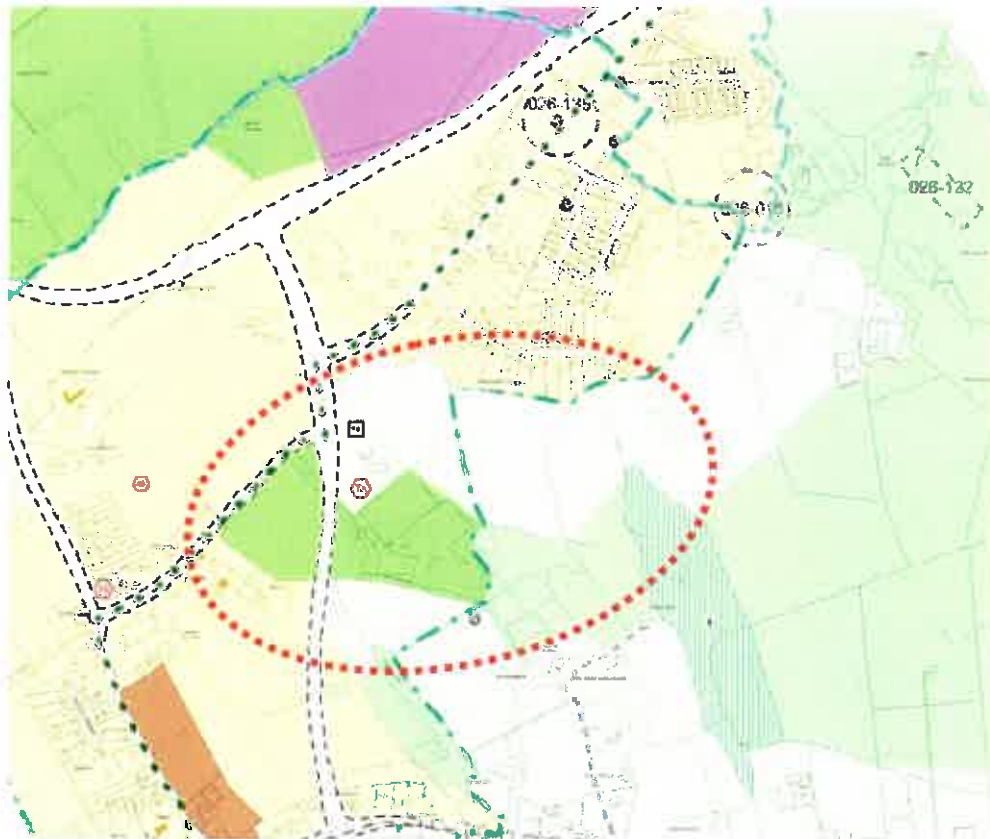
## **2.0 SUBMISSION ON THE DRAFT EMRA RSES**

- 2.1 The Draft RSES states *"The Core Strategies of the relevant Local Authorities should demonstrate consistency with the population targets expressed in the NPF and the Implementation Roadmap for the National Planning Framework July 2018. The NPF identifies a target population of 1.4 million people in Dublin City and Suburbs for 2031, an increase of some 220,000 people, and a target of 1.65m. in the MASP an increase of some 250,000 people."*
- 2.2 The population for DLR was 218,018 in the 2016 Census which is below the predicted population of 222,800 under the Regional Planning Guidelines (RPG's). The County has also continued to experience the lowest growth rate within the four Dublin planning authorities.
- 2.3 The Draft RSES sets out the following in its settlement strategy in relation to Dublin City and suburbs:
- 'Support the consolidation and re-intensification of infill, brownfield and underutilised lands with 50% of all new homes to be provided in the existing built up area of Dublin City and Suburbs in tandem with the delivery of key infrastructure to achieve a population of 1.4 million people by 2031'.*
- 2.4 We welcome the strong policy support expressed in the Draft RSES for densification and consolidating growth within the Metropolitan area, and trust that this policy objective will translate into the bringing forward of additional zoned lands for residential development, particularly in Dun Laoghaire Rathdown having

regard to the insufficient quantum of land zoned for residential use within the current Dun Laoghaire Rathdown County Development Plan.

- 2.5 Figure 2 below indicates serviced lands within DLR, currently zoned for rural and agricultural use. The lands are located adjacent to the Kiltiernan / Glenamuck LAP area, and in proximity to the Luas line and public transport, and therefore considered suitable to provide for additional housing development in accordance with the NPF recommendations for compact growth, the tiered approach to zoning, and the principles of sustainable development. It is respectfully submitted these infill lands are suitable for identification as Tier 1 or 2 residential zoning, as they are located adjacent to and surrounded by existing settlements and services and are well served by existing public transport infrastructure.
- 2.6 The National Planning Framework makes specific reference in Appendix 3 to a tiered approach to land zoning, with a particular focus on the zoning and phasing of lands for development which are serviced or serviceable. It is respectfully submitted that the subject lands constitute an opportunity to provide for sustainable compact development on lands which are fully serviced.

**Figure 2: Dun Laoghaire Rathdown County Development Plan Zoning Map 9**



- 2.7 Furthermore, the Jackson Family have provided significant community and social infrastructure in the form of Jackson Park, Wayside Celtic Football Club, including four playing fields, club house and community hall. This has all been

delivered in advance of any substantial new housing units in the area and is actively used by the existing local community.

- 2.8 Additional physical infrastructure in the form of the Glenamuck District Road Scheme, public park and school site are also planned for their lands, thereby delivering significant planning gain disproportionate to the quantum of land which is not zoned for development. Accordingly, it is respectfully submitted that a significant quantum of additional zoned lands will need to be identified, in suitable locations, within Dun Laoghaire Rathdown, and required to be zoned for residential use in the next Development Plan, or through variations of the current plan to help address the ongoing housing shortage and meet population targets in accordance with Nation Planning Policy.
- 2.9 The subject lands are located within the catchment of Section 49 Supplementary Development Contribution Scheme for the Glenamuck Road project. This is a clear indication that the subject lands will benefit from the increased accessibility provided by this project and militates in favour of the use of these lands for sustainable compact residential development. It is respectfully submitted that leaving the lands in their current greenfield state would be a missed opportunity given the significant investment in physical infrastructure in the area.
- 2.10 In support of additional zoning of lands for residential development, the subject lands form part of the Dublin Metropolitan Area Strategic Plan (MASP), as indicated in Figure 5.1 MASP Boundary. The MASP identifies Kiltiernan-Glenamuck area to be located within the Metrolink Corridor area and provides population capacity figures for the short, medium and long term. Kiltiernan-Glenamuck is identified as an area which will provide for new residential communities, as indicated in Figure 3 below. It is respectfully submitted that the lands currently zoned for rural and agricultural use, within the MASP, are suitable for identification as Tier 1 or 2 zoning for residential development, as they are located within and adjacent to existing settlements and services and are well served by existing public transport infrastructure.

**Figure 3: Extract of Table 5.1 MASP, Draft EMRA RSES**

| TABLE 5.1 Strategic Development Corridors, Capacity Infrastructure and Phasing   |  |   |  |
|--|--|---|--|
| Corridor   | Residential  | Employment/ Mixed Use   | Phasing/Enabling Infrastructure  |
| <b>Metrolink Corridor</b><br>(Metrolink/<br>LUAS greenline)<br><br><b>Population capacity</b><br>Short 28,000<br>Medium 25,000<br>Long 18,000<br><br><b>Total 71,000</b> | <b>Dun Laoghaire - Rathdowns</b> - New and emerging mixed-use districts of Cherrywood and Sandycroft. New residential communities in Ballyogan and environs and Kiltiernan-Glenamuck<br><br><b>Swords</b> - sequential development of strategic residential sites within Swords and development of Oldtown-Mooretown lands | Continued development of high-density business districts at Cherrywood and Sandycroft. New mixed use centres in Ballyogan and Kiltiernan<br><br>Airport related, commercial facilities and employment linked to development of Metrolink. | <b>Short to Medium term:</b><br>Metrolink, LUAS green line upgrades, Public transport and roads upgrades, LHAF road and bridge and N11 junction (Cherrywood)<br><br><b>Short - Medium term</b><br>Public realm, pedestrian and cyclist provision, LHAF road improvements, BusConnects. Additional runway and improved access (Airport) |



- 2.11 Having regard to the above points, it is respectfully submitted that the Regional Spatial and Economic Strategy for the EMRA region should include a recommendation that would require Dun Laoghaire Rathdown County Council to undertake a review of population targets, zoned land and infrastructural requirements, with respect to the tiered approach set down in the NPF, and bring forward a variation of the Development Plan / LAP's to ensure the County provides a greater contribution to meeting the population targets for the Dublin City region going forward.
- 2.12 It is suggested therefore that an additional Regional Policy Objective should be added under Section 4.3 (page 43 of the draft Strategy) as RPO 4.3 to ensure a sufficient quantum of zoned lands are brought forward to meet population targets set out in the NPF Roadmap and the Draft RSES.
- 2.13 The following wording is respectfully suggested, to be inserted as RPO 4.3 of the RSES, should the Assembly be minded:
- RPO 4.3: Planning Authorities must ensure a sufficient quantum of zoned residential land is provided for in Core Strategies having regard to the population targets expressed in the NPF and the Implementation Roadmap for the National Planning Framework published in July 2018'.*
- 2.14 The zoning of the subject lands for residential development would accord with national planning policy which supports zoning additional land to allow compact growth of Dublin and recommends that *'the location of new housing provision is to be prioritised in existing settlements as a means to maximising access, a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure'.*
- 2.15 This is particularly relevant given the timeframe for delivering development on current zoned lands as illustrated by the example of Kiltiernan / Glenamuck LAP area. These lands have been zoned since 2004 and have significant water and drainage infrastructure in place, however, due to time periods required to produce Local Area Plans, the failure to deliver road infrastructure in a timely manner and the time required to design and secure planning permissions no significant development in the area has been facilitated to date.
- 2.16 As indicated in Appendix 1, our client's site is one of the first sites to obtain a planning permission and if 12 months is allowed to complete the construction of the residential units this gives a 15 year period between zoning and completed homes for occupation.
- 2.17 In addition, and having regard to the recommendations of the NPF, this submission suggests that the RSES should recommend that planning authorities take a tandem view to the zoning of lands (i.e. the tiered approach recommended in the NPF), which allow for improved planning in respect to the zoning of land and the delivery of infrastructure and public transport, and greater certainty for both planning authorities and landowners.

**3.0 CONCLUSIONS**

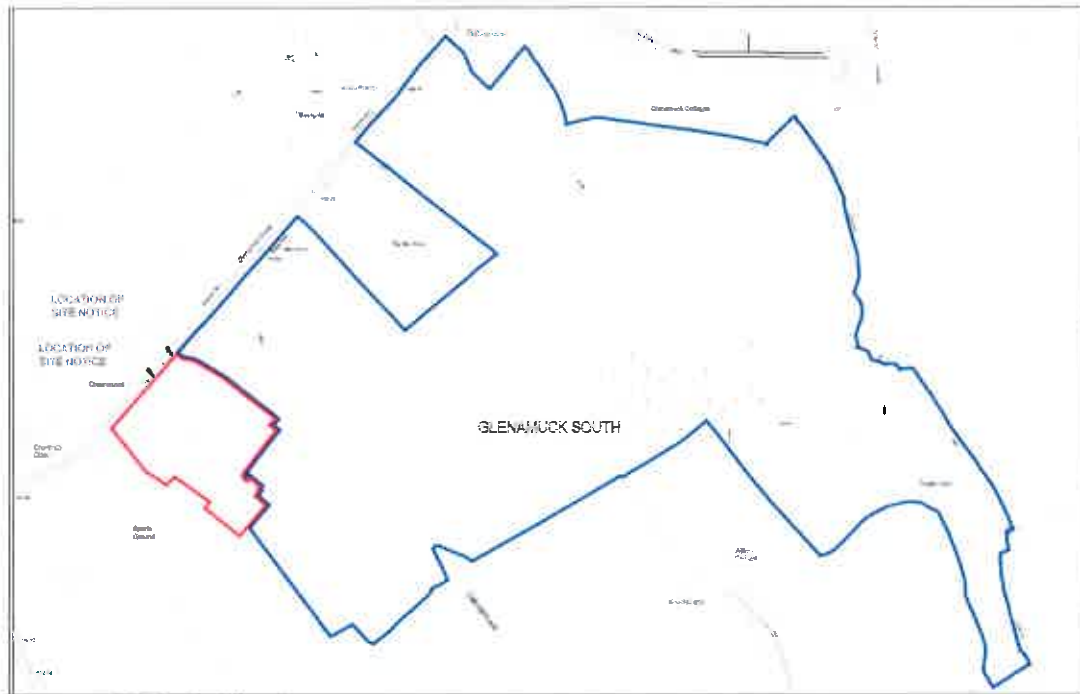
- 3.1 We would be grateful if this submission could be given careful consideration during the preparation of the RSES for the Eastern and Midlands Regional Authority.
- 3.2 This submission has set out the relevant questions and issues raised within the pre-draft Issues Paper for the EMRA RSES, has provided a review of the relevant existing and emerging planning policy context and has set out in detail grounds of submission and requested points of information which are requested to be included within the RSES for the EMRA.
- 3.3 We would be grateful if this submission could be given careful consideration during the preparation of the Draft RSES for the Eastern and Midlands Regional Authority. If you require any further information, please do not hesitate to contact us.

Yours faithfully,

  
John Spain Associates  
**John Spain Associates**

## **Appendix 1- Jackson Family Lands at Glenamuck**

### **1. Landownership Map**



Source: DDA Architects

A final grant of permission for 49 no. residential units has been secured under Reg. Ref.: D17A/0793 for the lands identified in red above. Our client has commenced with the detailed design stage and is progressing towards construction. A Phase 2A residential development has been permitted by DLRCC for 5 no. houses under Reg. Ref.: D18A/0566. On a site south east of the Phase 2A site, an application for the construction of a four storey apartment block comprising of 57 no. residential units is currently being considered by An Bord Pleanála, following a decision to refuse permission by DLRCC on the basis of prematurity on the local road network.

An overall site masterplan (see No. 3 below) indicates how the adjoining residential zoned lands could be developed, however, the LAP requires the distributor road to be delivered concurrently.

It is apparent from the masterplan drawing and land use zoning extract below that there is considerable potential to zone additional residential lands in this location, particularly given the level of additional infrastructure planned under the Local Area Plan, which will be required to be funded by Section 49 contributions / LIHAF.

The zoning and development of these adjoining lands will help fund local infrastructure and ensure the viability of residential development in this location, i.e. ease the financial burden of the significant Section 48 and 49 financial contributions.



**Table 1: Details of Residential Planning Applications in the Kiltiernan / Glenamuck LAP Area**

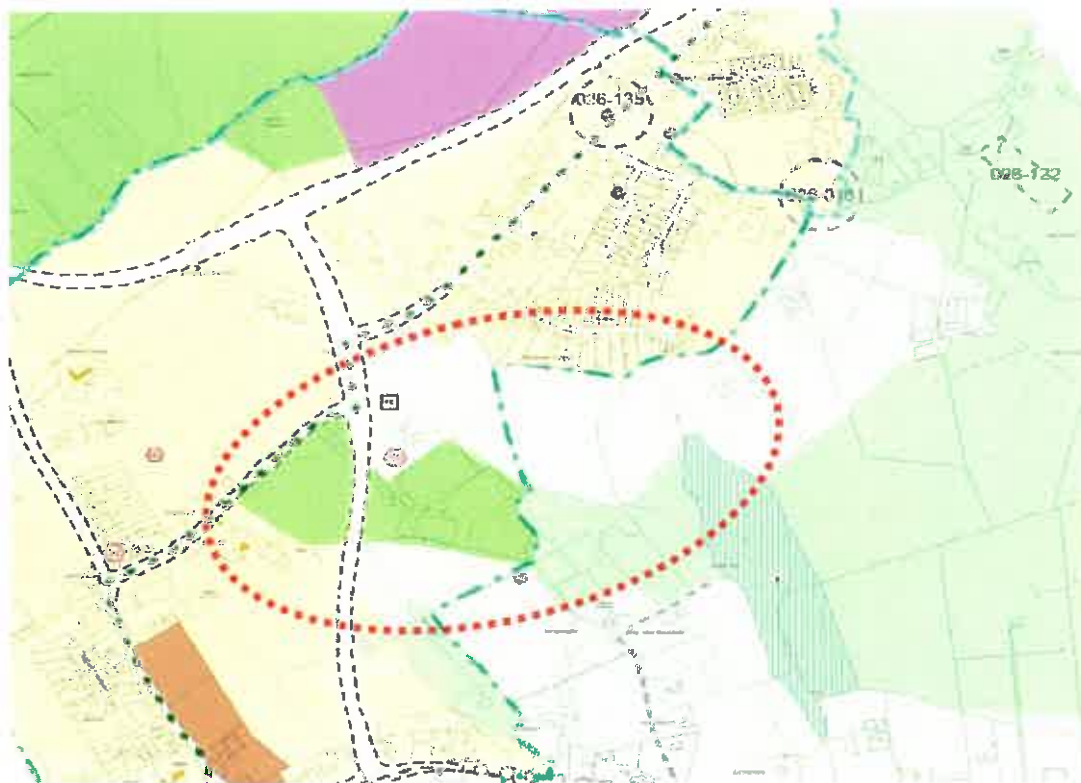
| Planning Reference                                      | Location   | Decision                              | No. Of Units         | Expiration  |
|---|--|---------------------------------------|----------------------|---|
| D16A/0090   | Golden Ball Site   | Approved by ABP on 27/10/2016         | 39                   | October 2021  |
| D15A/0443   | Willow Glen, Glenamuck Road                              | DLRCC Grant 12/02/2016                | 31                   | June 2021(Under construction)                                   |
| D14A/0766   | Brambledown, Glenamuck Road                              | DLRCC Grant 01/04/2015                | 11                   | Completed   |
| D14A/0765   | Saxaroon and Inglenook, Glenamuck Road                   | Grant from ABP 01/07/2015             | 28                   | July 2020 (Under construction)                                  |
| PC/01/07  | Cromlech Close   | Part VIII approval                    | 15                   | Completed   |
| D10A/0026   | Ashwood Farm   | Approved by ABP 27/09/10              | 139 (incl. a creche) | September 2020  |
| D17A/0520   | Drumkeen, Glenamuck Road                                 | Approved by ABP 07/02/2018            | 15                   | February 2023   |
| D17A/0793 (Phase 1)                                     | Rockville House, Glenamuck Road                          | DLRCC Grant 25/01/2018                | 49                   | January 2023 (Under construction)                               |
| Reg. Ref.: D18A/0566 (Phase 2A)                         | Site south of Rockville House, Glenamuck Road            | DLRCC Grant 08/11/2018                | 5                    | August 2023 (Construction commencement planned for Spring 2019) |
| <b>Total Permitted Units</b>                            |  |                                       | <b>332</b>           |   |
| <i>Proposed Phase 2B Development</i>                    | <i>Site southeast of Rockville House, Glenamuck Road</i> |                                       | <b>57</b>            |   |
| <b>Total Permitted and Proposed</b>                     |  |                                       | <b>389</b>           |   |
| <b>Other Relevant Planning Applications in the Area</b> |  |                                       |                      |   |
| D10A/0716   | Kiltiernan Garden Centre                                 | Approved by DLRCC on the 13.9.11      | 68                   | Lapsed  |
| D15A/0768   | Rockhurst, Enniskerry Road                               | ABP decision to refuse dated 28/06/16 | 15                   | Refused for two no. reasons                                     |
| D16A/0054   | Greenmount and Dun Oir, Glenamuck Road Upper             | ABP decision to refuse dated 19/12/16 | 139                  | Refused for one no. reason                                      |
| ABP Ref.: 300731-18                                     | Greenmount and Dun Oir, Glenamuck Road Upper             | ABP decision to refuse 26/04/2018     | 141 (incl. a creche) | Refuse for 4 no. reasons (Density too low)                      |

|           |                                   |                           |    |                          |
|-----------|-----------------------------------|---------------------------|----|--------------------------|
|           |                                   |                           |    | and design concerns)     |
| D18A/0303 | Golden Ball site, Enniskerry Road | Refused by DLRCC 31/05/18 | 97 | Refuse for 6 no. reasons |
| D18A/0623 | The Leys, Glenamuck Road South    | Refused by DLRCC 21/08/18 | 52 | Refuse for 4 no. reasons |

The table above demonstrates the number of permitted residential units (estimated as 332 no. units based on a planning history search of extant permissions) in the Glenamuck – Kiltiernan LAP area. In this respect it is apparent that the number of permitted and pending residential units in the Glenamuck – Kiltiernan LAP area is substantially below the 700 no. units envisaged as a first phase, in advance of the GDDR and GLDR, as set out in Section 10 of the LAP.

It is clear at this stage that the majority of the LAP area will not be developed in the lifespan of the Local Area Plan and it is requested that additional land in the short term is brought forward to address this defect.

**2. Land Use Zoning Map Extract – Dun Laoghaire Rathdown County Development Plan 2016-2022**



### 3. Current Proposed Masterplan for Residential and Adjoining Lands

