

Submission

On the

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

On behalf of

Green Property REIT Ventures DAC

To

*Eastern & Midland Regional Assembly
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1.0 INTRODUCTION

- 1.1 On behalf of our client, **Green Property REIT Ventures DAC, 32 Molesworth Street, Dublin, D02 Y512**, we wish to make a submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Authority.
- 1.2 Our client owns significant landholdings at Central Park, located in the Sandyford Business District which remain to be developed. Central Park accommodates a mix of uses, including office, retail, and residential uses and is highly accessible having regard to its proximity to the nearby Central Park Luas stop on the Green Line.



Figure 1 – Approximate location of Central Park.

- 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.

2.0 POINTS OF RELEVANCE WITHIN THE DRAFT EMRA RSES

- 2.1 The points of interest contained within the draft RSES for the EMRA with regard to the Sandyford Business District, including Central Park are outlined below.

Central Park, Leopardstown

- 2.2 The draft RSES seeks to '*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*'. It seeks to achieve this through the delivery of high quality new housing with a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration.

- 2.3 The Dublin Metropolitan Area Strategic Plan (MASP) as part of this draft RSES refers to the Metrolink Corridor (Metrolink/ LUAS Greenline extension) as a 'Strategic Corridor' and states;

'The development of the proposed MetroLink project, subject to appraisal and delivery will unlock significant long-term capacity in Swords-Lissenhall in South Fingal - Dublin Airport and in the south county at Sandyford, Cherrywood and Ballyogan linked to upgrading of the LUAS Greenline'.

- 2.4 Sandyford is also identified as a strategic site within the MASP section of the overall Draft RSES document, on the future metrolink / Luas Green Line corridor as set out under Table 5.1 of the RSES.

- 2.5 The RSES in discussing the Metrolink corridor refers to:

'New residential communities in Ballyogan and environs and Kiltieman-Glenamuck' and 'the continued development of high-density business districts at Cherrywood and Sandyford. New mixed use centres in Ballyogan and Kiltieman'.

And;

'The proposed Metrolink route will continue via the city centre and onwards to Sandyford using the existing LUAS Greenline and the proposed upgrading of this line will support new and emerging districts in the south county at Sandyford, Cherrywood and Ballyogan'.

- 2.6 Cherrywood, Ballyogan and Sandyford are referenced as strategic employment locations in the Dublin Metropolitan Area.

3.0 GROUNDS OF SUBMISSION

- 3.1 Our client's lands at Central Park are zoned Objective OE – 'To provide for office and enterprise development'. Residential is not listed as a use open to consideration within this land use zoning. The immediately adjoining lands at Central Park are zoned for residential development. Residential use is not permitted at present across the great

majority of Sandyford / Central Park (including the undeveloped portion of Central Park), under the Dun Laoghaire Rathdown County Development Plan 2016-2022.

- 3.2 This submission respectfully contends that the lack of scope to provide for mixed use development including residential on such lands is a significant missed opportunity for Sandyford and Central park as a strategic location for growth (as identified within the Draft RSES document). The area is exceedingly well served by public transport, road infrastructure, and social and physical infrastructure and amenities, including schools, shops, restaurants and sports facilities. It is respectfully suggested that the RSES provide an opportunity to encourage a mix of uses at this strategic location, in accordance with national policy including the recently published Urban Development and Building Height Guidelines.
- 3.3 The opportunity exists to deliver residential development as part of wider mixed-use development in this strategic location, thereby providing much-needed housing at a highly accessible location, while also improving the vibrancy and viability of the Sandyford / Central Park area. The introduction of residential use as part of such a move towards mixed uses would support activity in the Sandyford / Central Park area, and support the provision of services and amenities for residents and workers alike.

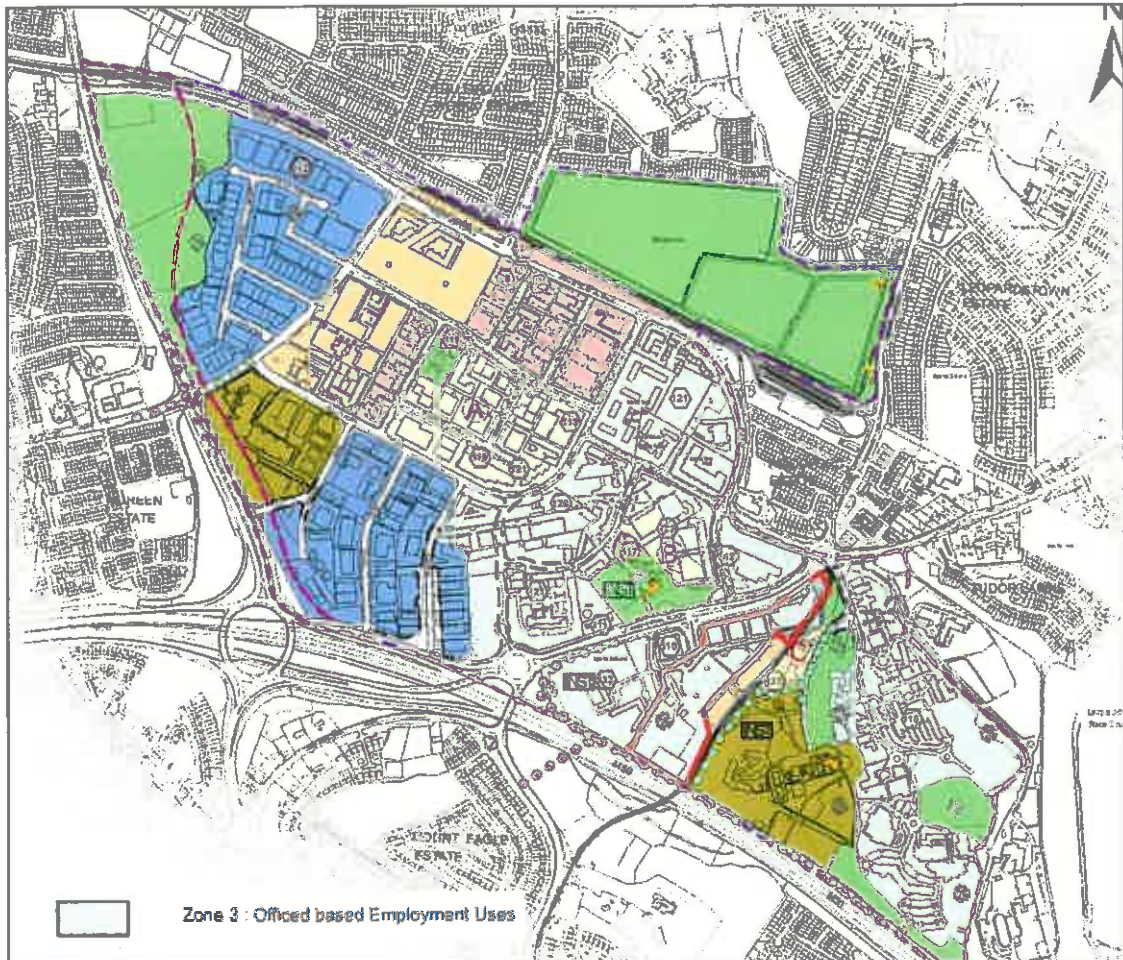


Figure 2: Extract from the zoning map of the Sandyford Urban Framework Plan

- 3.4 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 is serviced.
- 3.5 We note that the RSES provides a positive framework for consolidating growth within the Metropolitan area and providing for increased building heights in appropriate locations, as set out under the recent Building Height Guidelines. We note also that the Draft RSES prioritises the delivery of a significant quantum of development within the exiting built up area of Dublin City and within its suburbs.
- 3.6 The MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area including:
- 'Integrated transport and land use – Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including BusConnects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks'.*
- 3.7 The MASP also identifies Strategic residential and employment development corridors to create sustainable compact communities, including the Metrolink Corridor (Metrolink - Luas Green Line extension) which Central Park is located within.
- 3.8 It is considered therefore, based on recent Section 28 guidelines including the National Planning Framework, the Apartment Guidelines 2018 and the Urban Development and Building Heights Guidelines that our clients lands at Central Park are suitable for residential development at Central Park, having regards to its location adjacent to high quality public transport (Luas Green Line) and the potential to locate residential development within a substantial existing employment area, consistent with the principles of sustainable development.
- 3.9 SPPR 2 of the 2018 Building Height Guidelines states:
- "In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans² could be utilised to link the provision of new office and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities."*
- 3.10 It is respectfully submitted that the subject landholding at Central Park holds significant potential for the provision of compact, sustainable development at appropriate heights and density, and is well suited to providing for an enhanced mix of uses going forward, including residential use. The pursuit of a sustainable mix of uses going forward would actively enhance the area, adding to its vibrancy and liveliness, bringing greater activity and life to the area outside of office hours.

- 3.11 It is therefore respectfully suggested that 'Table 5.1 - Strategic Development Corridors, Capacity Infrastructure and Phasing' within the RSES is amended (with additional text shown in **red**) to state the following in relation to residential development on the Metrolink Corridor.

'Dun Laoghaire - Rathdown – New and emerging mixed-use districts of Cherrywood and Sandyford (including Central Park). New residential communities in Ballyogan and environs and Kiltieman-Glenamuck'.

Continued development of high-density business districts at Cherrywood and Sandyford, along with the introduction of a sustainable mix of uses (including increased residential) in Sandyford, including at Central Park. New mixed-use centres in Ballyogan and Kiltieman

- 3.12 The proposed amendment, for all of the reasons set out herein, would promote Sandyford including Central Park as a suitable location for additional residential development as well as a key employment location, and provide for an enhanced, living, sustainable community at this key strategic location in the Metropolitan area and the Region.
- 3.13 It is submitted that lands at Sandyford / Central Park and on the Luas Green Line/Proposed Metrolink Corridor hold potential for compact development at a location which provides access to all necessary services and amenities required for residential development, and which is within the footprint of the existing built up area in accordance with the provisions of the NPF and the policies and intent of the Draft RSES document. It is therefore considered appropriate for the final Regional Spatial and Economic Strategy to reference the potential of Sandyford Business District including Central Park to accommodate residential development.

4.0 CONCLUSION

- 4.1 This submission has been prepared by John Spain Associates on behalf of our client, Green Property REIT Ventures DAC. The submission seeks to highlight the suitability of Sandyford Business District / Central Park for additional residential development, in accordance with Government policy, particularly as set out under SPPR 2 of the Urban Development and Building Height Guidelines. The submission respectfully suggests minor amendment to the wording of the Draft RSES document in order to more clearly reference the potential of these lands to achieve sustainable compact growth in order to provide for the ambitious targets for the consolidation of Dublin City set out within the NPF, via the inclusion of a greater proportion of residential use.
- 4.2 As a key strategic planning document for Dublin, the RSES provides an opportunity to identify these lands as a location suitable for residential development, on an existing high quality public transport corridor.
- 4.3 As noted above, it is respectfully submitted that the above amendment to the text of the Draft RSES can assist in providing for the delivery of much needed housing at an

appropriate serviced location adjacent to high quality employment and public transport provision in accordance with the objectives of the National Planning Framework.

- 4.4 We would be grateful for the Assembly's consideration of these suggested amendments during the finalisation of the EMRA Regional Spatial and Economic Strategy for adoption. If you require any further information please do not hesitate to contact us.

Yours Faithfully,



John Spain Associates