

Submission

On the

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

On behalf of

Park Developments

To

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

- 1.1 On behalf of our client, Park Developments, The Herbert Building, The Park, Carrickmines, Dublin 18, we wish to make a submission on the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Authority (EMRA). This submission builds upon the pre-draft submission made on behalf of our client in February 2018.
- 1.2 Our client is a significant landholder in the Dublin area, who is actively developing a number of residential zoned sites at Churchtown Road Upper (Dublin 18), Clay Farm Phase 1 and 2, Ballyogan Road (Dublin 18) and Diswellstown, Dublin 15, and has obtained planning permission for residential development on other sites, including Glencairn, Dublin 18 and Brennanstown Road, Dublin 18. They also own other lands which are considered suitable for residential development in the short to medium term which are currently not zoned for such use.
- 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 building heights in appropriate locations, as set out under the recent Section 28 Building Height Guidelines 2018.
- 1.4 In summary, this submission seeks to re-iterate the following relevant issues raised during the pre-draft consultation phase and submit policy recommendations in respect to same:
1. The requirement to zone additional lands for residential development to facilitate population growth in a sustainable manner in Dublin City and Suburbs, particularly Dun Laoghaire Rathdown (DLR) given the low relative levels of population growth over recent development plan periods;
 2. Undertaking a review of all surplus open space and underutilised greenfield zoned lands in suitable locations in the Dublin Metropolitan Area and bringing forward variations to Development Plans to zone such lands for residential use;
 3. Supporting the provision of greater building heights in the Metropolitan Area, particularly along public transport corridors and within town, district and neighbourhood centres.

2.0 SUBMISSION ON DRAFT RSES FOR THE EMRA

- 2.1 This submission requests that a number of matters be considered in the context of the Draft RSES with suggested alterations to the text of the document set out below.
1. ***Requirement to identify additional land for residential development in Dublin City and Suburbs, particularly Dun Laoghaire Rathdown (DLR)***
- 2.2 The NPF sets out a policy framework to direct population growth of between 235,000 - 290,000 people into the Dublin City and Suburbs area in the period 2018-2040. Half of all new homes in the Dublin City and Suburbs area are to be accommodated on underutilised infill or brownfield sites. The Draft RSES re-iterates this goal, stating as a key growth enabler for the Dublin Metropolitan area "*at least 50% of new homes will be delivered within or contiguous to the existing built up area*". The Draft RSES prioritises

urban infill and the regeneration of brownfield sites in order to provide for compact development at sustainable densities, with lands being prioritised sequentially to favour development within existing built up areas.

- 2.3 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.
- 2.4 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'.*
- 2.5 We welcome the strong policy support expressed in the Draft RSES for densification and consolidating growth within the Metropolitan area and providing for increased building heights in appropriate locations, as set out under the recent Section 28 Building Height Guidelines 2018, 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.
- 2.6 This submission identifies lands at Kiltiernan / Glenamuck (which are zoned Objective B – Rural Amenity and Agriculture and Objective G – High Amenity Areas) within DLR which are 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 (see Appendix 1 for the approximate location of lands adjacent to the Kiltiernan / Glenamuck LAP in Park Developments ownership).
- 2.7 The subject lands at Kiltiernan / Glenamuck are part of the Dublin Metropolitan Area Strategic Plan (MASP) LAP area and are in close proximity to the Green Luas line and the M50. Additional physical infrastructure in the form of the Glenamuck District Road Scheme, public park and school site are also planned for the area. It is therefore respectfully submitted that the lands are suitable for identification as Tier 1 or 2 residential zoning, given their location adjacent to existing settlements and services and are well served by existing public transport infrastructure.
- 2.8 The subject lands are partly located within the catchment of Section 49 Supplementary Development Contribution Scheme for the Glenamuck Road project and it is therefore considered appropriate to provide for additional residential zoned lands to sufficiently utilise this public investment in physical infrastructure.
- 2.9 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, having regard 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.

- 2.10 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.
- 2.11 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'.

- 2.12 It is also respectfully suggested that these lands are included within the Strategic Development Corridor (Metrolink Corridor (Metrolink/ LUAS Greenline extension) identified in the MASP which currently references 'New residential communities in Ballyogan and environs and Kiltiernan-Glenamuck'.

2. A review of surplus open space zoned lands in the Dublin Metropolitan Area

- 2.13 This request relates to the significant proportion of underutilised land within the Greater Dublin Area, particularly zoned for open space, which is not actively used for such purposes and which is not required to meet open space standards for existing communities, which could be identified for residential development and help towards addressing the current housing crisis (see Appendix 2 and 3 for the approximate location of lands adjacent to Stepside Village in Park Developments ownership for an example of such lands).
- 2.14 In this regard, we respectfully suggest the following insertion under Section 3.2 of the Draft RSES document (on page 28 of the draft document) which could be inserted as a further growth enabler for the Dublin metropolitan area:

- *'Investigate the use of surplus open space zoned land and 'leftover' space to achieve the densification of existing suburban areas via infill development'.*

- 2.15 In order to set in motion a process whereby Local Authorities will evaluate and take stock of surplus open space zoned lands within their operational areas (with a review to their re-zoning and redevelopment as appropriate) it is further submitted that an additional Regional Policy Objective should be added under Section 5.7 (page 79 of the draft Strategy) to initiate an audit of surplus open space zoned lands by Planning Authorities. The following wording is respectfully suggested, to be inserted as RPO 5.6 of the RSES:

'RPO 5.6: Planning Authorities within the Dublin city and suburbs area will undertake an appraisal of surplus open space zoned lands within their operational areas, with a view to rezoning surplus / inactive open space zoned lands by way of variation or as part of the Development Plan review process as appropriate to facilitate the densification of existing urban and suburban areas'.

- 2.16 As previously stated in a submission on the pre-draft RSES on behalf of our client, there is a strong planning rationale for the re-use of these leftover / surplus open space zoned lands as a means to provide increased density within existing suburbs, while ensuring that ample open space remains for existing and future residents.
- 2.17 Directing a significant proportion of infill residential development toward surplus open space zoned lands within the Dublin City and Suburbs area will provide significant advantages as set out within the previous submission on the pre-draft stage of the RSES including inter alia:
- Better spatial alignment of population growth, residential development and employment;
 - Contribution to the renewal and regeneration of declining areas of Dublin, making more effective use of existing physical and social infrastructure in the city;
 - Delivery of housing where it is needed most, with positive effects on homelessness; and
 - Less strain on critical road infrastructure.
- 2.18 It should be noted that good quality infill developments will be required to deliver high quality amenity spaces and community facilities as part of redevelopment proposals which would more than compensate for the surplus open space zoned lands they replace, which in effect are surplus to the requirements of existing residential communities, i.e. open space provision is in excess of the relevant development plan standards (c. 10% to 15% per development or relevant to the population depending on the relevant development plan).
- 2.19 The zoning of surplus / leftover open space zoned lands would accord with national planning policy which supports a sequential approach to the zoning of land to provide for the compact growth of Dublin.

3. Support the provision of greater building heights in the Metropolitan Area, particularly along public transport corridors and town, district and neighbourhood centres

- 2.20 The NPF states that '*general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc*'.
- 2.21 *The Urban Development and Building Height Guidelines, adopted in December 2018, encourage greater height in accessible urban locations to provide compact urban form and the delivery of additional housing and employment development. SPPR 1 of the Building Height Guidelines states "In accordance with Government policy to **support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and***

Economic Strategies and shall not provide for blanket numerical limitations on building height."

2.22 Greater building heights is also supported by the Apartment Guidelines 2018 which identifies locations suitable for higher density apartment development at central and/or accessible locations which are:

- *within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or centrally located employment locations, that may include hospitals and third-level institutions, having regard to proximity and accessibility to employment centres and public transport facilities*
- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas);*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided.*

2.23 We note the RSES states the following under RPO 5.4: *'Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'1, 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines2, and Draft 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

2.24 We would respectfully suggest that the RPO 5.4 objective could be strengthened with the following additions:

*'Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities, **greater building heights** and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'1, 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines2, and the 'Urban Development and Building Heights Guidelines for Planning Authorities, **particularly in central and / or accessible locations**'.*

3.0 CONCLUSIONS

3.1 This submission has outlined some suggested amendments to the Draft RSES which would further support the objectives of the NPF to deliver compact and sustainable growth in Dublin City

3.2 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.

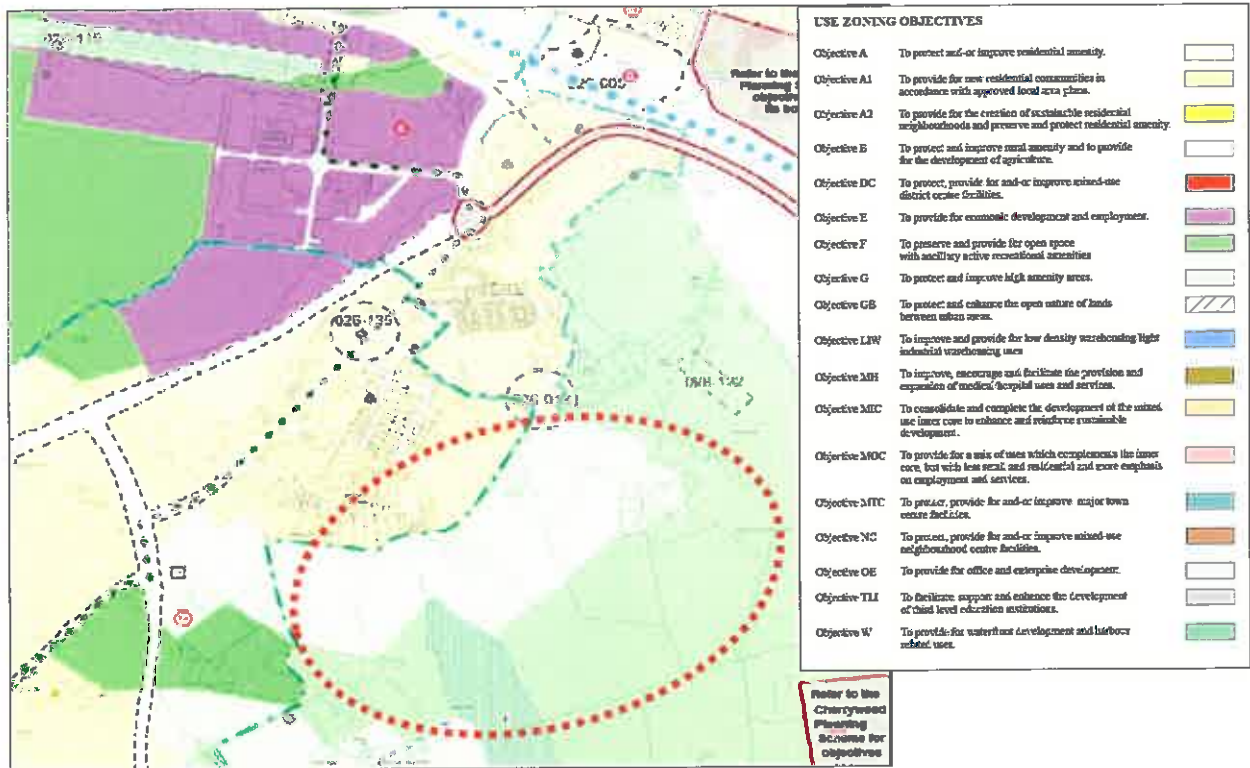
Yours faithfully,



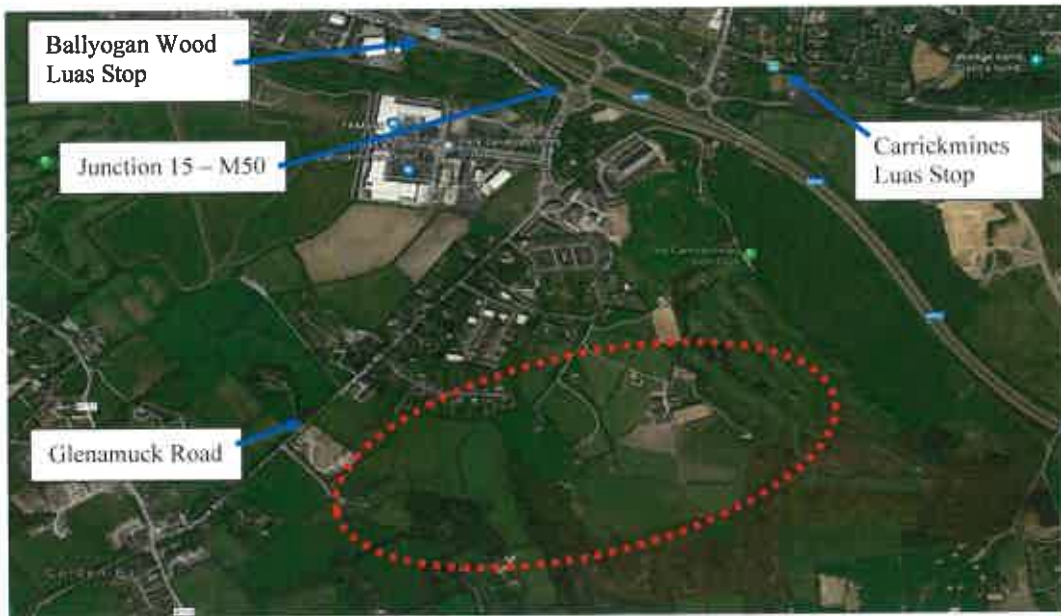
John Spain Associates

APPENDIX 1 - LANDS ADJACENT TO KILTIERNAN / GLENAMUCK LAP (DLRCC)

Lands south of Glenamuck Road suitable for Residential Development (Dun Laoghaire Rathdown County Council) (zoned Objective B – Rural Amenity and Agriculture and Objective G – High Amenity Areas).



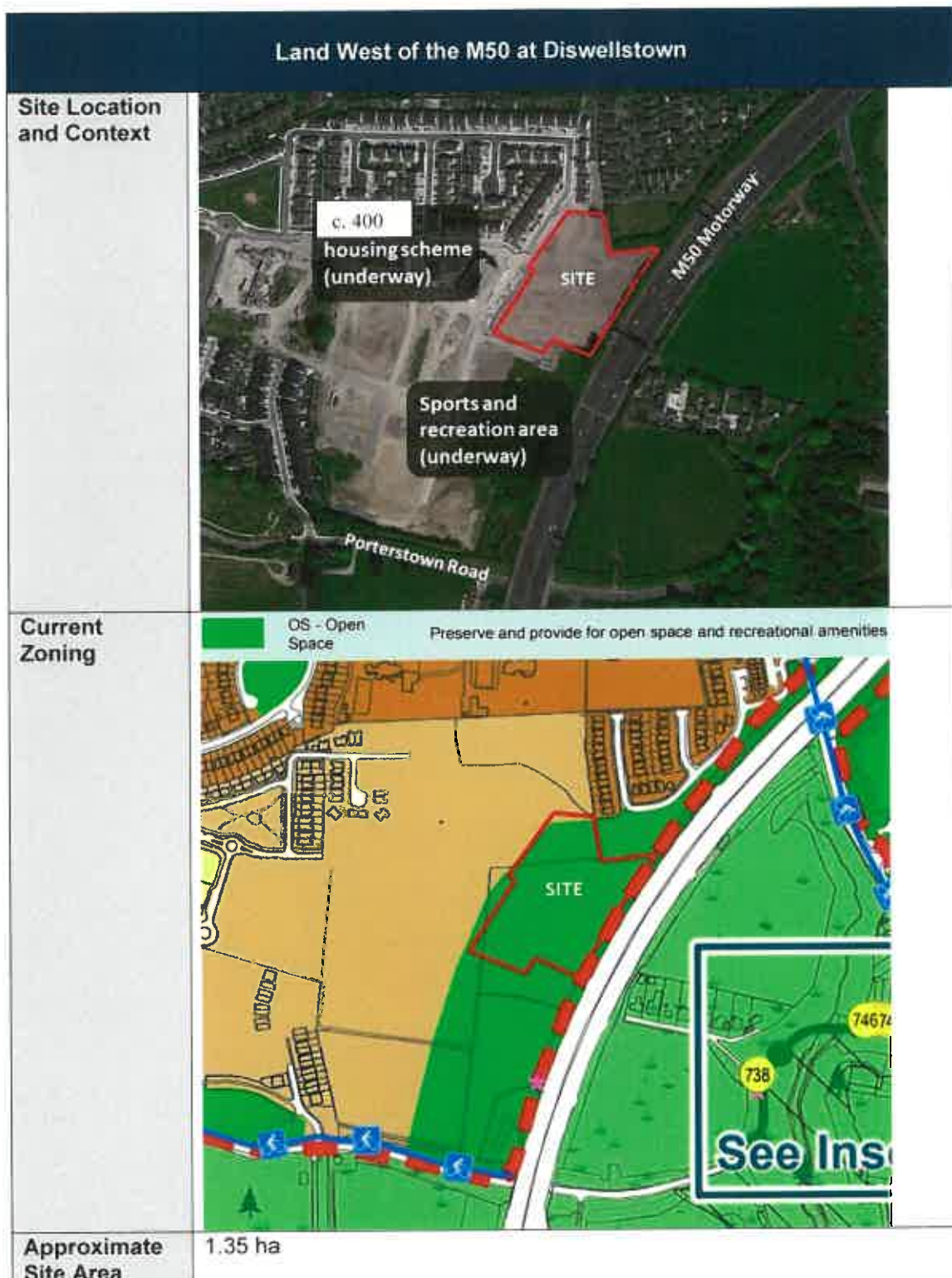
Source: Dun Laoghaire Rathdown County Development Plan Zoning Map 9



APPENDIX 2 – LAND AT STEPASIDE VILLAGE (DLRCC)



APPENDIX 3 – DISWELLSTOWN, CASTLEKNOCK, DUBLIN 15 (FINGAL)



Estimated Capacity	43 dwellings (Based on an assumed suburban residential density of 40 dwellings per hectare and an 80% gross-to-net (site usage) ratio).
Current Use	The land is currently scrub / disused. It has been established in recent
Accessibility	The site has road access via the 225-unit housing scheme to the west. The site is approximately 7 mins walk from the No. 37 (Blanchardstown Centre to Baggot Street) bus route.
Environmental Constraints	None identified. Development would require acoustic barriers along the M50 motorway to the east.
Services and Facilities	The site is approximately 4 mins walk from St. Patrick's National School and Diswellstown Community Centre. The site is immediately adjacent to the new sports and recreation area being delivered as part of the adjacent 225-unit housing scheme.