

Submission

On the

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

On behalf of

Hugh McGreevy & Sons and Tierra Ltd.

To

*Eastern & Midland Regional Assembly
3rd Floor North, Ballymun Civic Centre
Main Street
Ballymun
Dublin 9
D09 C8P5*

23rd January 2019



John Spain Associates

Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

**39 Fitzwilliam Place
Dublin 2 D02 ND61
www.jsaplanning.ie**

1.0 INTRODUCTION

- 1.1 On behalf of our client, **Hugh McGreevy & Sons and Tierra Ltd, 181 Howth Road, Killester, Dublin 3**, we wish to make a submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Authority. Our client is the owner of lands within and in the vicinity of the Adamstown Strategic Development Zone, which are considered an appropriate location for the delivery of significant residential development going forward.
- 1.2 Our client owns a significant landholding within the Adamstown SDZ and on lands immediately adjoining the SDZ boundary. Our client has recently secured permission under Reg. Ref.: SDZ17A/0006 on lands within the SDZ for a development comprising *inter alia* 169 residential units across a range of types, new road infrastructure (including a portion of Adamstown Drive road), along with public open space, and pedestrian and cycle facilities.
- 1.3 As will be set out hereafter within the grounds of this submission, two parcels of land which are contiguous with the boundary of the SDZ and which are within the ownership of our client exemplify the opportunities which exist to provide for further compact and sustainable growth in the vicinity of the SDZ, on lands which benefit from strong infrastructure provision and which would eventually tie in with the ongoing development of the SDZ lands. The location of our client's lands is set out within Appendix 1 of this submission.
- 1.4 The Celbridge link road has been permitted and will serve our client's landholding. The road was permitted partially under a planning application (Reg. Ref. SDZ17A/0009) within the SDZ area, and partially via a Part 8 application made by South Dublin County Council under Reg. Ref: SD178/0009.
- 1.5 On this basis, and having regard to the examples provided herein of lands within our client's ownership, it is considered appropriate that the final RSES document should make specific reference to the potential for additional development at Adamstown and on the Kildare Rail corridor.
- 1.6 The recognition of such potential within the final RSES document would help inform future development plan reviews in order to ensure the delivery of compact, sustainable growth at appropriate locations which are already targeted for growth in general terms by the Draft RSES document.

2.0 POINTS OF RELEVANCE WITHIN THE DRAFT EMRA RSES

- 2.1 Bearing the above points in mind, it is noted that the Draft RSES document does, in general terms, support the delivery of significant development at locations such as Adamstown. The Draft RSES prioritises the delivery of a significant quantum of development within the existing built up area of Dublin City and within its suburbs, along with compact, sustainable growth on lands contiguous to the existing built up area.

2.2 At page 44, the Draft document notes that the NPF sets out ambitious targets to achieve compact growth, with a significant percentage of new development to be targeted to areas within the built-up area or Dublin or contiguous with it. The RSES identifies strategic locations for this compact growth, including the western suburbs and Adamstown.

2.3 On page 69 of the draft document, within the Metropolitan Area Strategic Plan (MASP) for Dublin, Adamstown is identified on a key transport corridor (the South-West Corridor). The MASP targets the consolidation of Dublin’s western suburbs along this key corridor, supported by the Kildare Rail line, the Luas red line, strong bus provision, and capacity upgrades to existing transport services.

2.4 Page 70 of the Draft RSES states the following:

“The consolidation and western expansion of the city can be achieved through the development of strategically located sites at Clonburris, Kilcarbery and Adamstown SDZ, linked to increased capacity and electrified services on the Kildare rail corridor, to be delivered by 2027, with employment lands at Grangecastle supported by additional bus connections.”

2.5 At page 73 of the draft document, road improvements at Adamstown are identified as a key infrastructural priority in the MASP area, to facilitate integrated development, aligned with transport and infrastructure investment.



Figure 1: Extract from the Draft MASP for Dublin, page 69 of the Draft RSES

- 2.6 Table 5.1 of the Draft RSES identifies that the south western corridor has a total population capacity of c. 66,000 persons, with capacity for 45,000 in the short term and a further 21,000 in the medium term. The continued development of Adamstown SDZ is identified as a key factor in the provision of this population growth. Continued growth in the short to medium term will be facilitated by the extension of DART services to Celbridge-Hazelhatch which will serve the Adamstown area.
- 2.7 Adamstown is identified as a Level 3 Town / District Centre (key service centre) within the retail hierarchy set out within the RSES.
- 2.8 Having regard to the foregoing, it is considered that the Draft RSES does provide adequate support for development and sustainable growth at Adamstown SDZ, however as is set out in this submission, it is respectfully submitted that the final RSES document should note the importance of lands at Adamstown in general (including lands adjacent to the SDZ) as a location for sustainable growth.

3.0 GROUNDS OF SUBMISSION

- 3.1 As set out above, our client welcomes the provisions in the draft RSES which underline the importance of Adamstown as a location for significant development, in order to provide for the ambitious targets for the consolidation of Dublin City set out within the NPF.
- 3.2 Notwithstanding the references set out above from the Draft RSES, which primarily relate to the Adamstown SDZ area, it is considered that it would be appropriate for the final RSES document to make specific reference to the potential for lands at Adamstown, proximate to the SDZ and the Kildare rail line, to provide for additional compact, sustainable growth.
- 3.3 The two parcels of land noted within this submission are considered to exemplify the potential for further development in the Adamstown area, having access to all necessary services to accommodate development at sustainable densities. The development of the SDZ lands to the east will incorporate significant physical and social infrastructure and amenities, including high quality open spaces, retail / district and local centre facilities, along several schools – all located on a high-quality public transport corridor. Elements of the infrastructure and amenities to be provided within the SDZ area are in place at present (for example schools which are operational in the southeast of the SDZ area).
- 3.4 The development of the SDZ lands is progressing, with several developers on site, and a number of recent planning permissions granted under the Planning Scheme.
- 3.5 The lands in the ownership of our client are on the route of the permitted Celbridge Link road, which has been permitted on foot of a planning application made for the portion of the lands within the SDZ boundary, and a Part 8 application made by SDCC for the remainder of the route.

- 3.6 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.
- 3.7 It is noted that in the short term to 2020, the Housing Agency has identified a need for at least 25,000 new homes every year up to 2020, which does not include for additional pent-up demand arising from undersupply of new housing in recent years. As noted above, strategically located and serviced lands at Adamstown (including those in our client's ownership) can play a small part in delivering much needed housing in the short to medium term in order to meet burgeoning demand and significant housing need.
- 3.8 It is submitted that lands at Adamstown and on the Kildare rail corridor hold potential for compact development at locations which are serviced / serviceable and which are within or spatially sequential to the footprint of settlement in this area. It is therefore considered appropriate for the final Regional Spatial and Economic Strategy to reference the potential of such lands at Adamstown, in addition to the references made in the draft document to the Adamstown SDZ and development at Adamstown in general terms, which are welcomed by our client.
- 3.9 As noted above, the inclusion of such a reference within the final RSES for the EMRA would be appropriate in encouraging the consideration of strategically located and serviced lands at Adamstown for zoning as part of the Development Plan review / variation processes which will be initiated upon the final publication of the RSES.
- 3.10 To this end, the following amendment is respectfully suggested to page 70 of the Draft RSES document, within the Draft Dublin MASP section of the overall document. For ease of reference, the relevant paragraph from page 70 of the document is set out below, with suggested additional text provided in **green** and text to be removed marked in **red** and struck through.
- “South western Corridor (Kildare line and DART expansion programme, N81 and Luas redline)***
- The consolidation and western expansion of the city can be achieved through the development of strategically located sites at Clonburris, Kilcarbery ~~and~~, Adamstown SDZ, **and lands in the vicinity of Adamstown SDZ**, linked to increased capacity and electrified services on the Kildare rail corridor, to be delivered by 2027, with employment lands at Grangecastle supported by additional bus connections. There is further capacity for regeneration of major brownfield lands at Naas Road, Tallaght and to create new residential communities at Fortunestown near to the emerging town of Saggart/Citywest, served by the LUAS redline”*
- 3.11 As noted above, it is respectfully submitted that the above amendment to the text of the Draft RSES could prove instrumental in the plan-led delivery of sustainable and compact development in lands at Adamstown, in order to provide for the delivery of much needed housing at an appropriate location contiguous with the footprint of existing / permitted development in accordance with the objectives of the National Planning Framework.

4.0 CONCLUSION

- 4.1 This submission has been prepared by John Spain Associates on behalf of our client, **Hugh McGreevy & Sons and Tierra Ltd, 181 Howth Road, Killester, Dublin 3**. The submission seeks to highlight the importance of hitherto underutilised lands adjacent to the Adamstown SDZ, and suggests minor amendment to the wording of the Draft RSES document in order to reference the potential of these lands to provide for sustainable compact growth.
- 4.2 As a key strategic planning document for Dublin, the RSES provides an opportunity to identify these lands as a location for future growth, on an existing public transport corridor and served by existing and permitted infrastructure, including the permitted Celbridge link road.
- 4.3 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

APPENDIX 1 – LOCATION OF LANDS AT ADAMSTOWN

Our client is the owner of a significant landholding at Adamstown, including land within the boundary of the Strategic Development zone, and further lands which adjoin the SDZ, which are used as an example within the current submission on the Draft RSES.

The lands are primarily greenfield in nature, and a portion of the lands within the blue line on the figure below are subject to an existing permission for residential development under the SDZ, pursuant to Reg. Ref.: SDZ17A/0006.

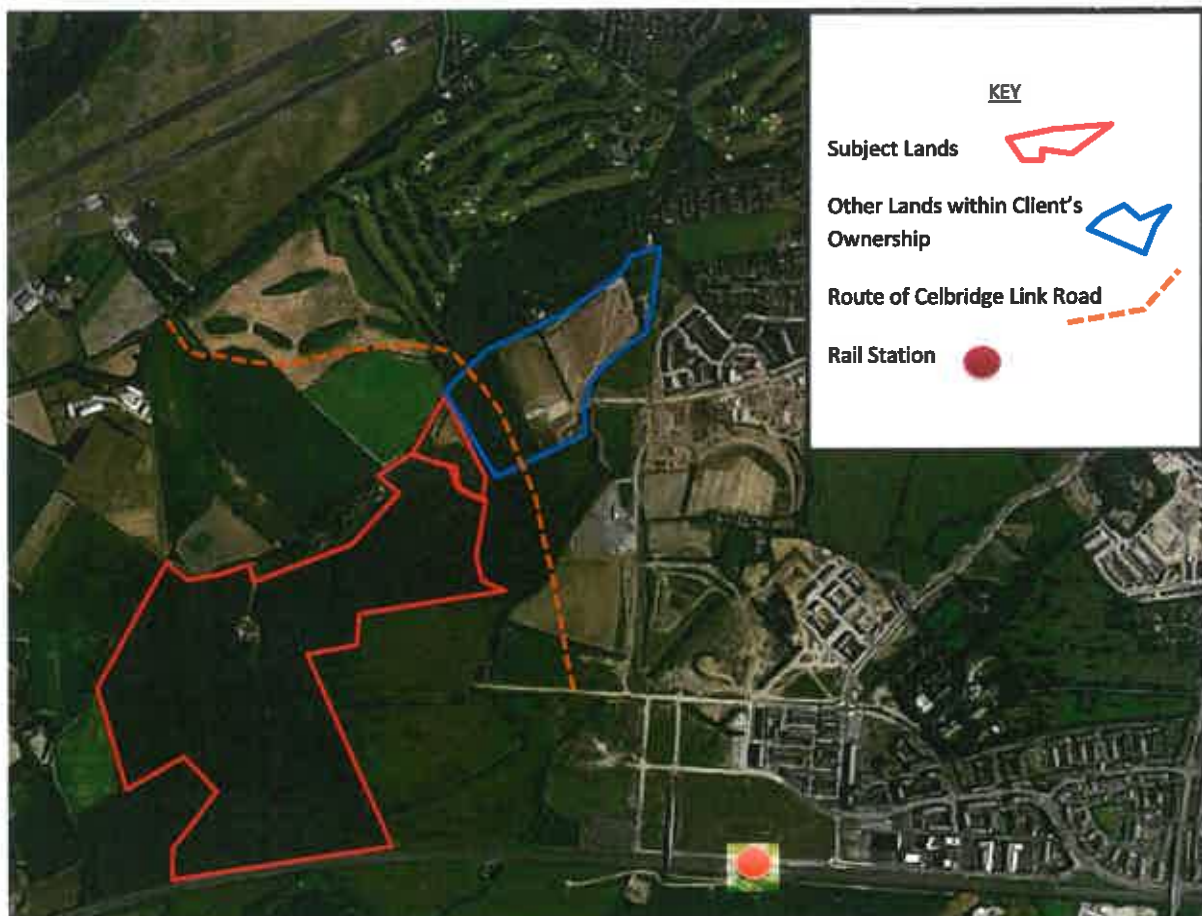


Figure A1: Location of our client's landholding at Adamstown subject to this submission



Figure A2: Extract from Adamstown SDZ Planning Scheme map, with our client's adjacent lands outlined in red

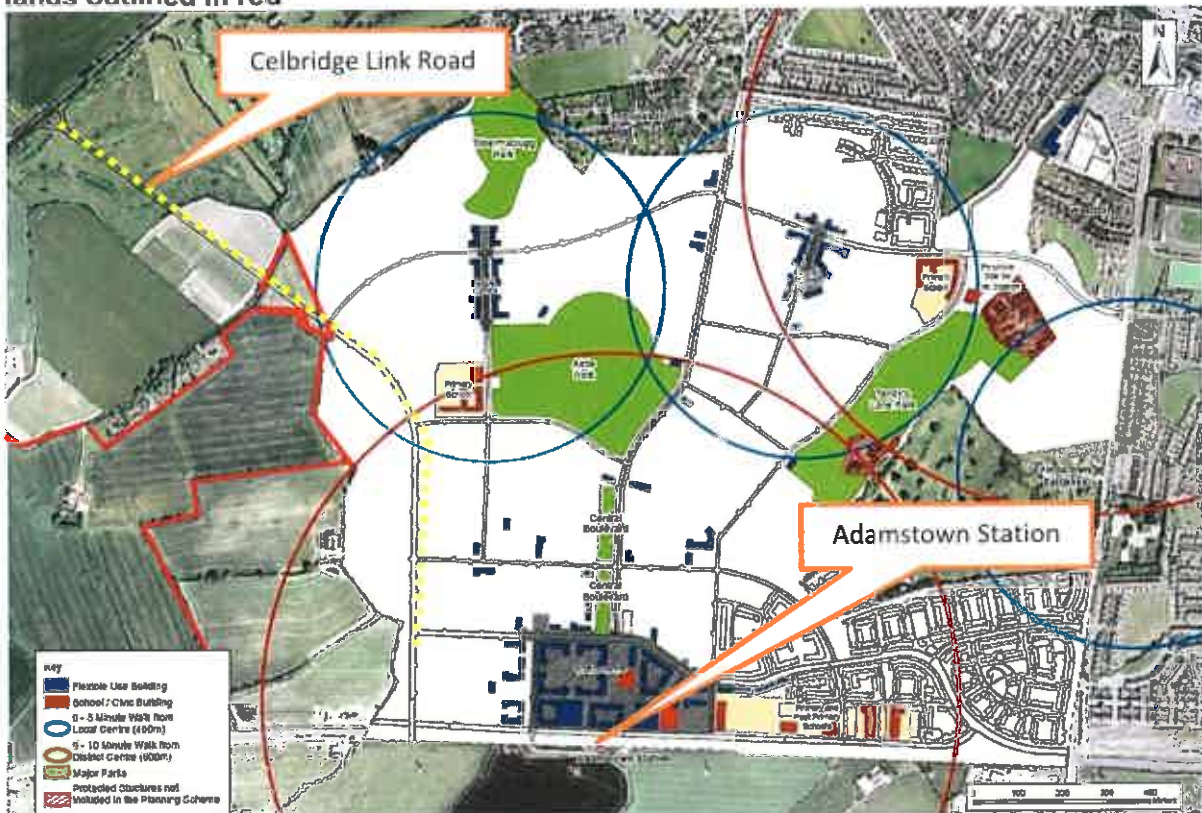


Figure A3: Extract from SDZ Hierarchy of Centres Map, with our client's adjacent lands outlined in red

As noted above, the development permitted under Reg. Ref.: SDZ17A/0006 consists of *inter alia* 169 residential units across a range of types, new road infrastructure (including a portion of Adamstown Drive road), along with public open space, and pedestrian and cycle facilities. An extract from the site layout plan for the permitted development is provided below for information purposes.



Figure A3: Extract from site layout plan for the development permitted under Reg. Ref.: SDZ17A/0006