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John Spain Associates

39 Fitzwilliam Place

Dublin 2

Submission on the Draft Regional Spatial and
Economic Strategy
for the
Eastern and Midlands Regional Assembly

John Spain Associates

On Behalf of

Kimpton Vale Limited

1.0 **INTRODUCTION**

- 1.1 On behalf of our client, Kimpton Vale Limited, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, we wish to make a submission on the Draft Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).
- 1.2 The key aims of the emerging EMRA RSES will be to provide the Eastern and Midland Region with a sustainable growth and settlement strategy and an appropriate supply of affordable housing whilst protecting the countryside and reducing greenhouse gas emissions. The RSES must be consistent with the objectives of the National Planning Framework (NPF).
- 1.3 The NPF sets out a policy framework to direct population growth of between 235,000 to 290,000 into the Dublin City and Suburbs area¹ 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 that 50% of new homes will be delivered within the existing built up area or contiguous with it. 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.
- 1.4 In view of the NPF and Draft EMRA RSES, we wish to respectfully submit policy recommendations with respect to the re-use of areas of surplus, underutilised or 'leftover' open space zoned lands within Dublin city and suburbs. As set out within this submission, it is considered that such lands could contribute a significant (and hitherto overlooked) landbank, affording an opportunity to densify the existing pattern of development within the city and suburbs, while concurrently maintaining adequate levels of quality open space for both existing and future development.
- 1.5 It is respectfully submitted that lands such as these constitute one of the few opportunities or means to retrofit increased density into existing residential areas, by inserting development at sustainable density onto lands which are currently partly or wholly unused, in areas where ample useable public open space exists. This opportunity is particularly unique and important in areas of existing suburban development, where broader redevelopment to introduce greater density would not be an option. It is respectfully submitted that a policy direction is required at Regional level for the four Dublin Planning Authorities to undertake an audit and review of such lands and to bring forward rezoning in suitable instances (such a review process could be of a similar nature to that currently being undertaken by DCC in respect of underutilised Z6 zoned lands).

2.0 **RECOMMENDATIONS WITH RESPECT TO INFILL RESIDENTIAL DEVELOPMENT WITHIN THE DUBLIN CITY AND SUBURBS AREA**

- 2.1 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). It is respectfully submitted that the following point 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.*
- 2.2 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, should the Assembly be minded:

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 such 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.

- 2.3 As has been previously summarised 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.
- 2.4 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;
 - Reduction in the counter-urban trend that scatters development at unsustainable locations that cannot support good quality services and facilities, including public transport; which will have positive effects in turn on health, quality of life, labour productivity and greenhouse gas emissions;
 - 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.
- 2.5 It should be noted that good quality infill developments can deliver high quality amenity spaces and community facilities 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).

Examples of Underutilised Open Space Zoned Lands

- 2.6 Our client, Kimpton Vale Limited is the owner of several land parcels which exemplify the opportunities inherent in existing underutilised / surplus areas of open space zoned land. This principle also equally applies to lower density 1960's – 80's housing developments which include large tracts of open space, which are often poorly integrated with the overall development.
- 2.7 The first example in the ownership of our client is located to the east of the M50 motorway at Collegefort / Collegewood, Castleknock. The second site which is also provided as an example overleaf is located to the south of the Windmill development, at Porterstown, Clonsilla.
- 2.8 Both of these areas of land typify the sort of 'leftover' land which can result due to the overprovision / excess zoning of open space zoned lands adjacent to other lands which are brought forward for development. These surplus areas of open space zoned land do not provide any feature or amenity in addition to the public and communal open spaces provided in existing adjacent developments. Such underutilised areas of open space zoned land, in fact can attract and become focal points for unwanted antisocial behaviour and dumping, due to lack of adequate footfall or passive surveillance from adjacent development. The underutilisation of such surplus areas of open space

¹ The CSO defines Dublin city and suburbs as the built-up area of Dublin, which extends beyond the M50 ring road to encompass the large urban areas of Blanchardstown, Tallaght, Lucan and Clondalkin and across Dublin Bay from the coastal villages of Howth to Shankill.

is also considered to be directly contrary to policies for the sustainable use of scarce urban lands which benefit from strong services and amenities.

2.9 In scenarios such as these, the repurposing and redevelopment of such lands could provide for infill development which would improve the structure and liveability of existing built up areas, while increasing the density of the area and the city as a whole, providing additional housing adjacent to existing services, and making use of lands which have heretofore not been used to their potential. The development of surplus lands such as these would also engender a considerable improvement to existing areas in urban design terms, providing opportunities for enhanced placemaking and improved quality of live for existing residents.

2.10 The development of such lands pursuant to rezoning would also necessarily provide for an appropriate percentage of high quality, landscaped, and useable open space in accordance with the relevant section 28 guidance and Development Plan standards, thereby ensuring that adequate levels of open space are maintained for the use of existing residents of the area and future residents of the developments on the existing surplus open space zoned lands.

Lands at Collegewood / Collegefort

2.11 The first example of existing underutilised open space zoned lands in the ownership of our client, which, it is submitted, could appropriately be used for additional residential development at a sustainable density are located to the east of the M50 motorway at Collegewood / Collegefort in Castleknock. The area of open space zoned land which is currently unused / surplus to requirements is circa 6 hectares. The lands are accessible via public transport and within easy walking distance of Castleknock village centre. The lands also benefit from having all necessary services in place to facilitate development, including roads, wastewater and potable water infrastructure. The NPF espouses the prioritisation of development within existing urban areas, and in particular on lands which have access to services and are ‘shovel ready’.

2.12 Existing development to the south and east of the underutilised lands (permitted under Reg. Ref.: F00A/0854/E1) includes areas of high-quality public and communal open space, in addition to a full sized GAA pitch. The ‘leftover’ green space adjacent to the development is currently covered by scrub and is unused.

2.13 Assuming a conservative / lower estimated density of development on these open space zoned lands, there would be potential for a residential development of c. 210 residential units a net density of c. 35 units per hectare, contributing a significant quantum of housing at a suitable location in close proximity to amenities and accessible by public transport (while providing for quality useable open space for both public and communal use). Such a development on these lands would also see the overall density of the existing built up area increase, while concurrently ensuring that an adequate level of green space remains in the form of useable landscaped public and communal open space as part of any future development.

Lands at Porterstown

2.14 The surplus open space zoned lands at Porterstown are located to the south of existing completed development forming part of the Windmill residential area in Clonsilla. These lands which are currently unused are also accessible via public transport (including Coolmine rail station) and within easy reach of amenities and facilities, including Blanchardstown Centre to the north. Services are in place to facilitate the development of these lands in the short-term.

2.15 These lands have the potential to provide for residential development, along with required public and communal open space as part of the wider development of the surrounding area, which will be undertaken as a continuation of the implemented development to the north of the underutilised lands (this implemented residential development represents the partial implementation of a wider

parent permission for our client’s landholding). A more recent permission also exists for the completion of the overall development under Reg. Ref.: FW15A/0145.

2.16 The Development Plan requirement for open space within Fingal is 2.5 hectares per 1000 population, which equates to 25 sq.m per person. The public open space provision is calculated at a rate of 75% Class 1 and 25% Class 2 with at least 10% of the overall site area dedicated to public open space. Objective PM47 states that it is council policy to:

“Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposed of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms”.

2.17 The open space zoned lands subject of this submission form part of the lands subject to planning permission Reg. Ref.: F02A/0358, and other amendments, for residential development in this location.

2.18 The overall residential scheme, as indicated in the FI response for FW15A/0145, provides for 33,130 sq.m. of public open space, which is in excess of the Development Plan requirement of 24,675 sq.m public open space based on existing and permitted residential numbers at Windmill, as indicated in Table 1 below. Thus, the existing and permitted development on our client’s landholding provides for a surplus of 8,455 sq.m. of open space. This available surplus could provide for an additional 97 no. 3+ bedroom residential dwellings in accordance with the Development Plan open space requirements and allowing for a sustainable density of development on the lands. If the alternative approach of providing 15% open space within residential developments was taken a significantly greater portion of open space zoned lands could be made available for residential use, which could be considered appropriate in this instance given proximity to Coolmine Rail Station on the Maynooth line.

Table 1: Public Open Space Requirement and Provision at Windmill, Porterstown

Public Open Space	Class 1 Requirement	Class 1 Provision	Class 2 Requirement	Class 2 Provision	Total Requirement	Total Provision
Public Open Space (25 sq.m.) for 337 no. residential units	17,766 sq.m.		6,909 sq.m.		24,675 sq.m.	
Total Provided		28,210 sq.m.		4,920 sq.m.		33,130 sq.m.

2.19 It is further noted that there are significant areas of useable open space and recreational space in the immediate vicinity and the surrounding area of the subject surplus area of open space. It is considered that the availability of adequate open space in the vicinity would be a relevant consideration in the undertaking of a review of surplus open space zoned lands by planning authorities.

2.20 The two examples provided herein are indicative of the opportunity which exists to provide for additional housing and development within the existing built up area of the city on lands which are not currently serving and significant use or purpose, while also ensuring that existing and future areas maintain adequate access to good quality open space and recreational areas.



2.21 While just two examples within our client’s ownership are provided as part of this submission, even a cursory examination of many areas of the city and suburbs (particularly those developed from the mid-20th century onwards at lower densities) reveal numerous opportunities for the provision of residential development within the city’s built footprint on lands which are currently substantially or wholly unused.



Figure 1: Map indicating location of subject lands indicating areas of high quality useable open space in the vicinity of the subject lands at Porterstown (open spaces indicated in green)

- 2.22 On that basis it is considered that the inclusion of a Regional Policy Objective as suggested above is appropriate, to instigate an appraisal by planning authorities responsible for Dublin City and Suburbs in order to identify unused open space zoned land (in both public and private ownership) which would be suitable for residential development (including elements of useable open space). As previously noted, such a review could be undertaken in a similar manner to that currently being progressed by DCC in respect of underutilised Z6 lands within the built footprint of the city.
- 2.23 It is respectfully suggested that such a ‘taking stock’ of lands of this sort would reveal numerous and significant opportunities to retrofit areas of suburban development towards a more sustainable urban density and form, in accordance with the stated objectives of the National Planning Framework and the intent of the Draft RSES for the EMRA.
- 2.24 It should be noted that such an exercise or appraisal, when undertaken by planning authorities, could clearly distinguish between open space lands which are currently in use by the public as an existing amenity or open space zoned lands in areas with low levels of open space provision, and lands of the sort which have been exemplified in this submission, which are surplus to requirements for open space in an existing area, are unused and underutilised, and which could be re-zoned for development in accordance with the proper planning and sustainable development of a given area.

Collegewood / Collegefort, Land East of the M50 at Castleknock	
Site Location and Context	
Current Zoning	<p> OS - Open Space Preserve and provide for open space and recreational amenities</p>
Approximate Site Areas	Existing development = 6.56 hectares Potential re-zoning, i.e. underutilised open space zoned land = 5.7 hectares GAA pitch = 1.48 hectares Open space area at entrance = 0.44 hectares
Estimated Capacity	200 residential units (Based on an assumed suburban residential net density of c. 35 dwellings per hectare).
Current Use	The land is currently scrub / disused.
Accessibility	The site has road access via Collegewood and is approximately 12 mins walk from the No. 37 (Blanchardstown Centre to Baggot Street) and No. 38 (Damastown to Ballsbridge) bus routes.
Environmental Constraints	None identified. Development would require acoustic barriers along the M50 motorway to the west.
Services and Facilities	The site is approximately 12 mins walk from the services and facilities in Castleknock village centre.

Land at Porterstown, South of Windmill Court, Clonsilla	
Site Location and Context	
Current Zoning	<div style="display: flex; align-items: center;"> <div style="width: 20px; height: 10px; background-color: #00b050; margin-right: 5px;"></div> <div>OS - Open Space</div> <div style="margin-left: 20px;">Preserve and provide for open space and recreational amenities</div> </div> 
Site Area	0.51 ha
Estimated Capacity	1 no. block of approximately 40 no. apartments and associated open space and car parking.
Current Use	The land currently forms part of a recreation and games area being developed as part of the adjacent scheme of 146 no. apartments. The layout of the recreation and games area could be easily changed to accommodate the additional apartment building with no loss of facilities.
Accessibility	The site has road access via Windmill Court. The site is approximately 7 mins walk from the No. 37 (Blanchardstown Centre to Baggot Street) bus route. The site is located within 500 metres walking distance of Coolmine Rail Station, which is on the Maynooth Commuter line and which will be upgraded to a DART commuter service under the National Development Plan.
Environmental Constraints	None identified.
Services and Facilities	The site is approximately 12 mins walk from the services and facilities in the Coolmine Industrial Estate and is immediately adjacent to the new sports and recreation area being delivered as part of the adjacent scheme of 146 no. apartments

3.0 CONCLUSIONS

- 3.1 This submission has outlined the considerable potential benefits accruable to the EMRA from directing a proportion of infill residential development in the Dublin City and Suburbs area toward surplus open space zoned lands. It is considered that the heretofore untapped development potential of these lands could contribute significantly towards the realisation of the goals of the NPF and the Draft RSES for compact sustainable development, while also allowing for the delivery of much needed housing and useable open space at locations within the existing built up area of Dublin.
- 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



39 Fitzwilliam Place

Dublin 2

(01) 662 5803

www.jsaplanning.ie

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