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**Submission to Strategic Issues Consultation Booklet**

**South Dublin County Development Plan 2022 – 2028**

**For lands**

**At**

**Edmondstown  
Whitechurch Road,  
Rathfarnham,  
Dublin 16**

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## **1.0 Introduction**

The following document has been jointly prepared by Simon Clear and Associates, Doyle Kent Planning; JFOC Architects, NRB Consulting Engineers, traffic and transportation, on behalf of BCKD Ltd managed by Tony Deane of Deane Homes Ltd, Michael Whelan of Maplewood Homes and Heatherbrook Homes, landowners, for lands located at Edmondstown/Kilmashogue, Co Dublin. Services infrastructure inputs have been provided to assess baseline conditions by CS, consulting engineers, who have received feasibility for connection to the drainage system and for water supply in the area from Irish Water.

At this stage of the Development Plan preparation process it is necessary to concentrate on the medium to long term big-picture and to identify strategic development opportunities that will feed in to an improved living and environmental context for the expanding metropolitan population in the South Dublin administrative area and beyond, integrating the facilities of the metropolitan area.

This report identifies the potential of the Edmondstown area as a potential integrated neighbourhood that should be promoted in the development plan as a new neighbourhood for the south eastern suburbs alongside the western boundary of DLRCC. This neighbourhood is located 8km south-west of Dublin City Centre, forming the eastern part of South Dublin County, part of Dublin City suburbs and the wider Metropolitan Area.

In line with National targets an additional 80,000 people and 32,000 new homes will be required within South County Dublin by 2040. One of the challenges of the new SDCDP is to identify and guide the construction of new homes in existing and new neighbourhoods within the suburban areas along with the development of associated public transport, multi-modal access routes to employment, community facilities, shops, schools and parks.

Identification of Greenfield potential lands and concentrating new construction within the M50 will help to prevent urban sprawl and facilitate the ability to work, live and play in a sustainable context, reducing the need to commute, suppressing carbon emissions and promoting walking and cycling.

National and Regional planning policy emphasises; compact growth in the Dublin Metropolitan Area, particularly within the M50 (in the case of this neighbourhood all lands to the east). The National Planning Framework emphasises the importance of placemaking through the development of attractive places supported by existing and planned transport infrastructure now and into the future. The challenge for the SDCDP in facilitating increased population and housing in this area will be to identify appropriate opportunities which protect existing amenities, underpin existing physical and community infrastructure and expand this where necessary. Community Services Sustainable neighbourhoods are supported by a range of community facilities that are fit for purpose, accessible and adaptable now and into the future.

The Edmondstown area is one such area that is within the M50. The potential of the Edmondstown neighbourhood, adjoining the amenities and infrastructure already developed in the DLRCC boundary area, is significant in its ability to accommodate a high quality, well designed and serviced, integrated community.

Edmondstown today is similar to where the Ballycullen/Oldcourt area was 20 years ago. That new development area is accessed by Stocking Lane, has been developed into a main distributor and bus corridor. Whitechurch Road is already superior to what Stocking Lane was then and has the same capacity for improvement; and with the provision of an east-west link street extending from the existing College Road in DLRCC to Edmondstown Road, a future road network that can accommodate extended public transport with segregated cycling and walking, is easily envisioned.

As these areas develop, it is vital that they do so with the necessary supporting facilities and services to facilitate the growth of sustainable communities. This south eastern neighbourhood area is already home to excellent public amenities, from local shopping to schools, public parks and cultural attractions. Against the backdrop of the Dublin Mountains, the Pearse Museum, St. Enda's Park and Rathfarnham Castle are fantastic local cultural attractions. The Whitechurch stream link to the Dodder Valley Linear Park with the adjacent Marlay Park and Bushy Park are all family-friendly public parks that are full of life and activity, along with newly developed mountain access routes and recreation facilities including Ticknock.

Built Environment & Place Making are key to providing great places in which to live, striking a balance between the delivery of a compact pattern of growth involving increased density and greater levels of infill development with the need for high-quality design, a strong emphasis on placemaking alongside a high-quality public realm including green spaces. The successful delivery of such measures within this neighbourhood will require a mix of uses, connections to sustainable transport and infrastructure, a joined-up approach to community planning and a strategic vision which includes a greater emphasis on placemaking.

### **Edmondstown Neighbourhood**

The Edmondstown lands are suitable for significant contribution to suburban residential capacity and can do so without the need for significant upgrades to road, water supply, drainage or public transport infrastructure taking into account: -

- The Edmondstown lands are located within the M50 perimeter;
- They are zoned A1 – Residential, subject to H3 SLO1;
- They have capacity to accommodate a neighbourhood of 2,750 – 3,300 additional persons;
- Development to this capacity would be compliant with the NPF and EMRA RSES strategies;
- Development would be consistent with Ministerial Guidelines;
- The lands are services and are accessible with minimal infrastructure development costs, by extending and connecting existing services including bus public transport – with no net cost to local or national authorities, including SDCC, NTA; or IW;
- Watermains and foul sewer capacity has been confirmed by IW and landholder agreement to extend existing infrastructure is in place;
- Developer funded infrastructure upgrades to the public cycling network, bus services network and connecting into existing and enhanced urban services and amenities have been costed and can be sustained;
- Upgraded services will benefit existing schools and houses in a number of ways, including connection to sewers, enhanced access and connectivity to services, amenities and cycle networks;
- Facilitating a greenway along the Glin River;
- Capability of developing an integrated neighbourhood structure.

## Site Location and Description

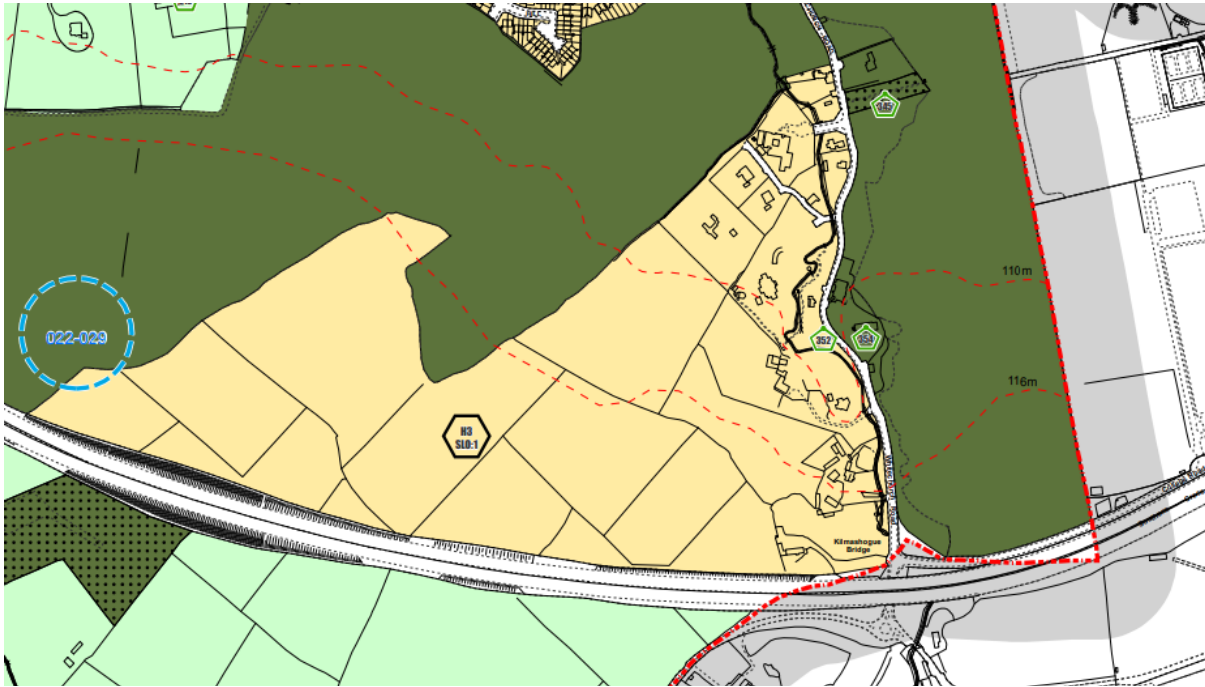
The lands are located within the Edmondstown sector of the south suburbs, bounded by the M50 on the south side and by Edmondstown golf club to the north. Marlay Park is located to the east side of Whitechurch Road, which marks the eastern boundary. There is a pattern of suburban development extending to the M50 perimeter established to the east and west within the South Dublin and Dun Laoghaire Rathdown administrative areas.



**General Context. Source: Google Maps**

The lands are currently in pastoral fields and the field pattern has been bisected by the M50.

The Edmondstown Lands shaded pale Yellow are already zoned for residential development in the South Dublin County Development Plan 2016 – 2022, subject to the provisions of SLO 1.



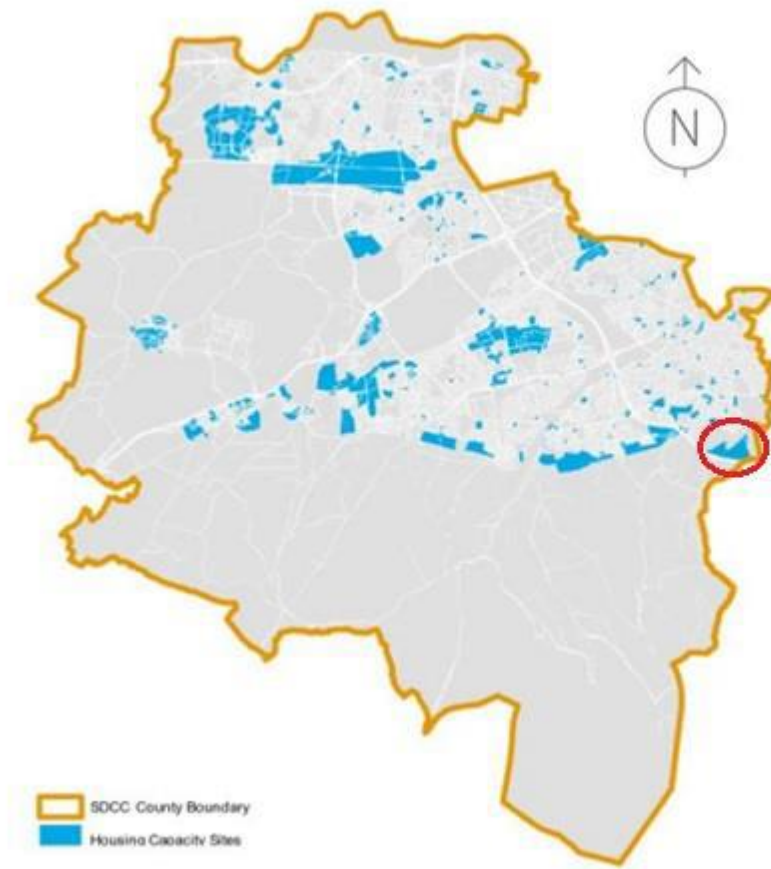
**SDCDP Zoning Map 2016-2022**

#### **SDCDP Variation 4 – Incorporating RSES**

In accordance with SDCP 2016 – 2022 Variation 4, the lands at Edmondstown are identified as housing potential lands within the M50, as indicated below.

*Map 1.3 below illustrates lands within the County capable of accommodating residential development. Such lands comprise of infill or new residential sites, lands designated as a ‘Strategic Development Zone’ or identified ‘Regeneration Lands’. The designated SDZ lands comprise of Adamstown and Clonburr located to the north west of the County. The SDZs present a shared outlook for the future residential, social, economic and environmental development of these areas in order to create a sustainable community. Lands identified ‘REGEN’ for regeneration purposes comprise of brownfield lands at Cookstown/Broomhill and along the Naas road which are capable of supporting and facilitating the regeneration of underutilise lands proximate to town centres and/or public transport nodes for more intensive enterprise and residential led development.*

Map 1.3 Capacity Sites



Map 1.3 Identifies Edmondstown lands (circled in Red) as Housing capacity lands

The Edmondstown lands are indicated as included in housing capacity sites for the purposes of population consolidation within the M50 in the SDCDP Variation 4 (south-east segment of Blue lands above).

### Core Strategy

The Core Strategy of the Development Plan identifies Rathfarnham as a Consolidation Area within the Gateway. Map 1.3 of the Core Strategy identifies the subject site as a 'Housing Capacity Site'.

Section 1.7.1 of the Development Plan describes consolidation areas as *suburban areas with established identities and communities with distinct heritage and character. These areas have a range of urban services such as transport, retail, medical and community facilities. Recent Census data identifies an aging population and stagnant or falling*

*populations, which presents a serious risk for the viability of services and facilities into the future.*

A key element of the overall Settlement Strategy is to promote the consolidation and sustainable intensification of the existing urban/suburban built form to the east of the M50 and south of the River Dodder, thereby maximising efficiencies from established physical and social infrastructure.

### **Grounds of Submission**

The constraint on the lands imposed by the current residential zoning for low-density development as set out in Specific Local Objective (SLO) H3 SLO1 should be removed and the land capacity within the M50 perimeter should be optimised.

The National Planning Framework, Project Ireland 2040, requires that infrastructural bottlenecks be addressed in Dublin. The landowners consortium represented in this submission considers that the infrastructural upgrades proposed in this detailed submission are readily deliverable without significant infrastructural investment by the Council or by other agencies.

Inclusion in the schedule of lands capable of delivering the residential quota in the south suburbs extending from Rathfarnham to the M50 will enable the developers of this significant landbank to put in place strategic transportation improvements on sections of the road adjacent to their lands, in both SDCC and DLRCC.

The strategic transportation improvements proposed in this submission will be consistent with DMURS and will result in the incremental improvement in safety along College Road, which will also facilitate direct access to cycle routes in the Dun Laoghaire Rathdown's administrative area and whose functional area immediately bounds Whitechurch Road. The lands at Edmondstown, which are strategically important and well located within the M50 perimeter, have the capacity to deliver between 1,000 - 1,200 housing units.

The NTA in their submission on the planning application SD19A/0105, as a prescribed body, indicated that the application site represents *‘the first proposal for development in this location (the ‘Edmondstown lands’), which comprises a large residentially zoned block which has the potential to cater for a significant number of housing units. While NTA is not opposed to development at this location in principle, there is concern that a piecemeal approach to development here could have serious implications for sustainable transport, in the following ways:*

(i) Public Transport Provision

In order for the proposed development – and the development of the full Edmondstown lands – to proceed in a sustainable manner, an approach to the expansion of the bus network to this location needs to be set out. At present, as part of the BusConnects programme provided for in the National Development Plan, there are no plans to extend public transport services or infrastructure to these lands. In the absence of full information as to the extent of development envisaged here, it is not possible for the NTA to make a determination as to the level of public transport services required at this location, and to identify the most appropriate manner in which the existing network serving Whitechurch could be extended and reconfigured to provide such a service.

(ii) Permeability

It is the view of the NTA that development on the Edmondstown lands should provide for full permeability for walking and cycling. While the material submitted with the proposed development references connectivity to the future development of adjoining lands, the location, nature and viability of such a connection has not been detailed. In the event of the proposed development proceeding at this point, it is likely that future retro-fitting of linkages would be challenging.

(iii) Cycling and Walking

The location of the proposed development, being inside the M50, is amenable for cycling and walking to local services, neighbourhood and district scale retail, and to work in Dublin City Centre and other major metropolitan employment centres. The location also makes it feasible that many residents of the proposed development would walk to local schools.

The nature of the local road network, however, is not amenable to the use of these modes for any trips, in particular by children. Given the scale of the zoning of the full Edmondstown lands, the NTA is of the view that a programme of measures to facilitate and promote walking and cycling from these lands to link in with existing walking and cycling infrastructure at Taylor’s Lane should be prepared.

The NTA recommended that, in advance of the commencement of development, an assessment of the cumulative impacts of the development of the full Edmondstown lands is undertaken, and that a programme of investment in transport infrastructure and services, and other local services, which would facilitate their development in a sustainable manner

is prepared, so that development could proceed in a manner which would be considered consistent with the Transport Strategy.

### **Traffic and Transportation**

NRB Transport Planners were commissioned to prepare a multi-modal sustainable transportation plan for the comprehensive, sustainable development of the Edmondstown lands. Their report examines how these lands can be integrated into the consolidated suburbs located within the M50 ring.

NRB are specialists in the area of Traffic/Transportation and in providing strategic advice on sustainable transport planning. NRB have studied the accessibility of all of the zoned lands in this sector in terms of Cyclists, Pedestrians, Public Transport and Cars through the examination of Local, National and Regional Plans and through the preparation of Preliminary Design Drawings. Please refer to the context map in Appendix 1 for details.

Empirical work included comprehensive Traffic Turning Movement Surveys and Traffic Speed Surveys undertaken in September 2019 during normal school term time. Whitechurch Road has been surveyed, on a chainage basis, in 2020.

As part of this Transport Strategy NRB designed a c.400m dedicated 2-way Cycle Link along College Road to connect with the Slang River Greenway and onwards into the NTA's Greater Dublin Area (GDA) Cycle Network, facilitating easy access to Dundrum Town Centre, to Luas and onwards to the Sandyford Employment area by safe cycle links.

In addition, a new main Link Road is envisaged running through the Edmondstown lands parallel to and inside the M50, ultimately connecting Whitechurch Road with Edmondstown Road. This is designed as a DMURS compliant carriageway with dedicated 2-way, off-road cycle lanes provided for subject to final design. These additional facilities will add c.1.8km of new cycle network to the NTA GDA Cycle Network facilities.

NRB have demonstrated that the development of these lands for high-density residential use will create a significant new commercial demand for Bus Use in this area with the lands developed and occupied. The new local Transportation Facilities and Road Network

has therefore, been designed to accommodate and facilitate an extension of existing Bus Services through the creation of a new Bus Terminus Point and turning area. This is a viable and sensible solution to allow the extension of Dublin Bus Whitechurch Services that currently terminate at Whitechurch Green.

The proposal could of course alternatively serve as a sensible extension of services from the east along College Road, such as the high frequency number 16 service, or it could indeed also facilitate the routing of Edmondstown Road services into the site. In these terms, the introduction of the new Local Relief Road with the increased potential for Bus Permeability by way of new services or via existing Service Extension/Enhancement, provides for very obvious flexibility in terms of Bus Penetration in the Local Area.

The Whitechurch Road average running carriageway width, measured between Church Road and the Roundabout to the North, is 5.95m – the general perception is that it may appear narrower due to the enclosed road nature and also due to the boundary trees and foliage. These combined act as a traffic calming feature and feed into the lower traffic speeds. The road width is within the range of widths for Link Streets (DMURS recommends lane widths between 2.75m to 3.5m as per Section 4.4.1 of the Design Manual for Urban Roads & Streets). The road is historically safe, with no Road Safety Authority Record of Accidents.

Given that the road is within the recommended widths of DMURS for Link Streets, we believe that with the improvements to the cycle & pedestrian network, the extension of the bus services, and with the beneficial addition of a neighbourhood centre, Whitechurch Road can support the traffic associated with the development of the lands in the absence of the full E-W road link between Whitechurch Rd and Edmondstown Rd.

### **Water & Wastewater Services**

Cronin Sutton (CS), consulting engineers have completed an assessment upon the full range of engineering services and flood risk assessment in respect of the Masterplan lands.

## **Water Supply**

There is an existing 4 inch main in Whitechurch road presently. Pre-Connection Enquires (PCE) have been submitted to Irish Water made under two separate land holders within the subject lands. Irish Water have confirmed that connections are viable subject to a valid connection application.

A new watermain will be laid from College Road to Edmonstown Road that will enhance the water services network and customer experience.

There is an agreement with the relevant land owners on Whitechurch Road to construct and install a c.1km length of new sewer infrastructure.

## **Foul Water Drainage**

A preliminary drainage solution has also been identified for the subject lands by CS Consulting Engineers, which has been subject to route assessment/detailed design. It is proposed to develop a gravity outfall which will connect to the public sewer in the Grangebrook Avenue residential scheme to the north of the lands. This alignment proposes the construction of a new gravity 225 diameter foul drain laid within Whitechurch Road discharging to Grangebrook Avenue residential scheme to the north of the lands. A recent planning application to SDCC Ref. SD19A/0105 utilized this outfall alignment.

## **Storm Water Management**

Any development on the Study Area will require Sustainable Urban Drainage Systems (SUDS) to manage surface water runoff. The type of SUDS measures will depend on local ground conditions and topography.

SUDS measures should be implemented in a management train, in that, where possible, surface water should be managed locally in small sub catchments rather than being conveyed to and managed in large systems further down the catchment. The final outfall location will be to the Whitechurch Stream to the east of the site.

## **Flood Risk**

A review of the OPW Database does not indicate previous incidents of Site Flooding. The SDCDP indicates the site is in Flood Zone 'C' and the Office of Public Works CFRAM Mapping Indicates the site is in Flood Zone 'C'.

## **Request**

With all of the above considered, we respectfully request that the proposed new SDCDP should:-

- Recognise the potential of the Edmondstown lands to provide a new high-quality integrated neighbourhood south of Rathfarnham;
- Remove the existing SLO placed on the zoned Edmondstown lands;
- Include a new Roads objective to provide a link street extending from the College Road/Whitechurch Road junction west to Edmondstown Road.

The above will allow for planning the delivery of a sustainable residential community in a neighbourhood of c.3,300 residents within the M50 south of Rathfarnham district centre.

**Simon Clear**

**24<sup>th</sup> September 2020.**



# RATHFARNHAM

# MILLTOWN

# DUNDRUM

# SANDYFORD

# MARLAY PARK

## CITY CENTRE

33 MINUTES TO ST STEPHEN'S GREEN

27 MINUTES TO ST STEPHEN'S GREEN

19 MINUTES TO LUAS P & R

**SLANG RIVER GREENWAY**  
LINKING TO DUNDRUM & BALLALY LUAS P & R

24 MINUTES TO SANDYFORD

ROUTE TO SANDYFORD AND STILLORGAN LUAS P & R

**THE SOUTHERN CROSS ROUTE**

TO SANDYFORD DÚN LAOGHAIRE & STEPASIDE

Edmondstown, Rathfarnham.

**EXTENSION OF SLANG RIVER GREENWAY**