



15th September 2021.

Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3EX.

Re:

**Submission in relation to the Draft
South Dublin County Development Plan 2022-2028
on behalf of Maplewood Residential
in relation to lands at
Finnstown, Lucan, Co. Dublin.**

Dear Sirs,

We act on behalf of Maplewood Residential, of Moritz House, Old Court Centre, Firhouse, Dublin 24, who are the owners of land in Finnstown, Lucan. We wish to propose that these lands be zoned for residential land use upon the adoption of the new South Dublin County Development Plan 2022-2028. This proposal is being put forward in response to the Draft Development Plan that is currently on public display. Our proposal is outlined in detail over.

1.0 Location

1.1 Maplewood Residential is the owner of approx. 10 hectares / 25 acres of land at Finnstown in Lucan. Bounding the subject site to the immediate south-west is the Finnstown House Hotel and grounds. To the immediate north is the low density development of Finnstown Fairways, while to the north and west is the Adamstown Strategic Development Zone (SDZ). The lands have direct access onto the R120 Newcastle / Lock Road.

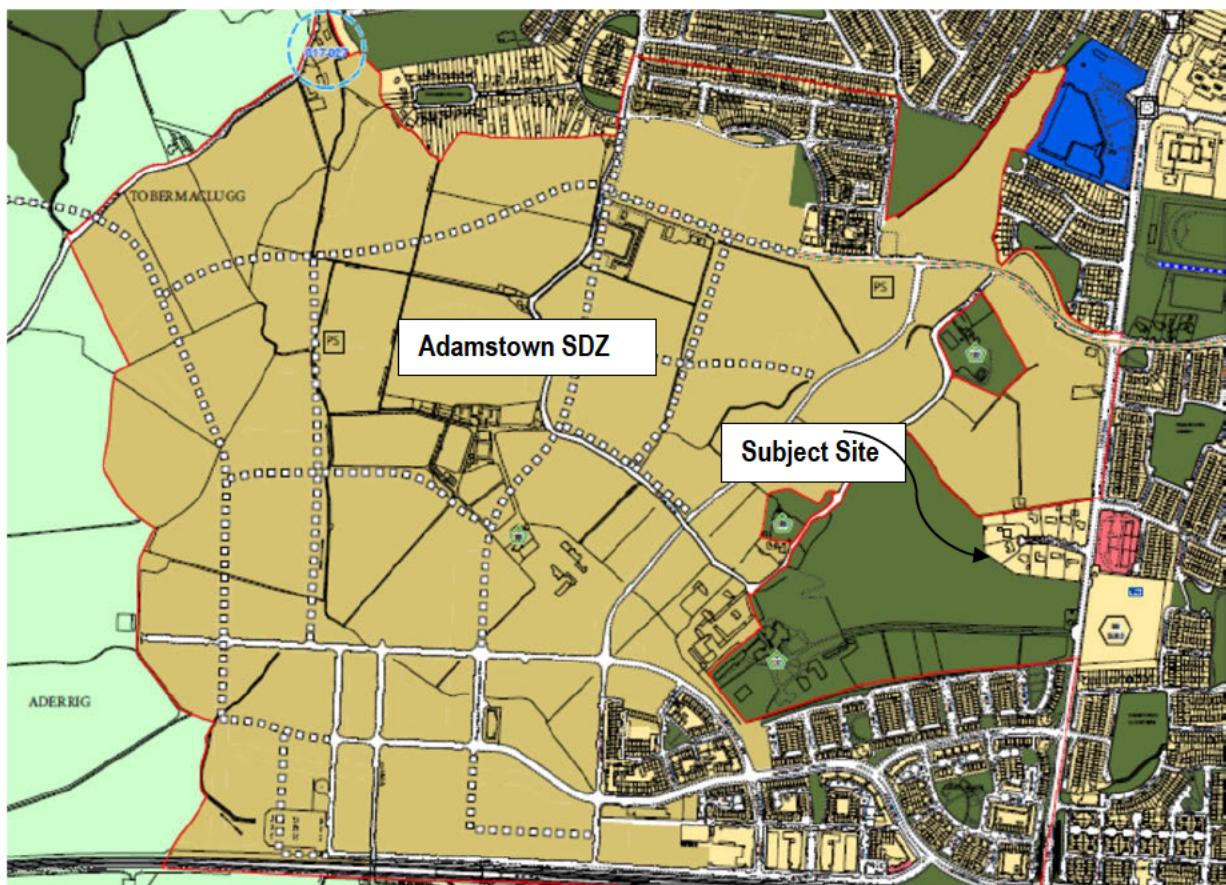


Fig. 1: Site Location Map
(Source: Extract from Map 1 South Dublin County Development Plan 2016-2022)

2.0 Planning & Locational Context

2.1 The lands are currently zoned Objective OS: "To preserve and provide for Open Space and Recreational Amenities" in the current South Dublin County Development Plan 2016-2022. The current Draft Plan 2022-2028 seeks to retain the OS land use zoning on the site. However, these lands are in private ownership and are currently in agricultural use, being grazed by cattle. The site is not accessible to or used by the public as recreational open space and is therefore of no benefit to residents in the area, nor does the current use of the site comply with the spirit of the current open space zoning objective attached to it. There are no long term plans to make this land available for use as open space, and there is no planning history attached to the subject site associating it with open space use.

2.2 The lands are surrounded by land either developed or identified/zoned for residential development, save for Finnstown House to the south-west, and are fully serviced with access available onto (i) the R120 Newcastle / Lock Road and (ii) Tandy's Lane. It is considered that these vacant lands are underutilised in their current format, being located within a built up urban area and unless zoned for a more appropriate and sustainable use, they will remain vacant and unused.

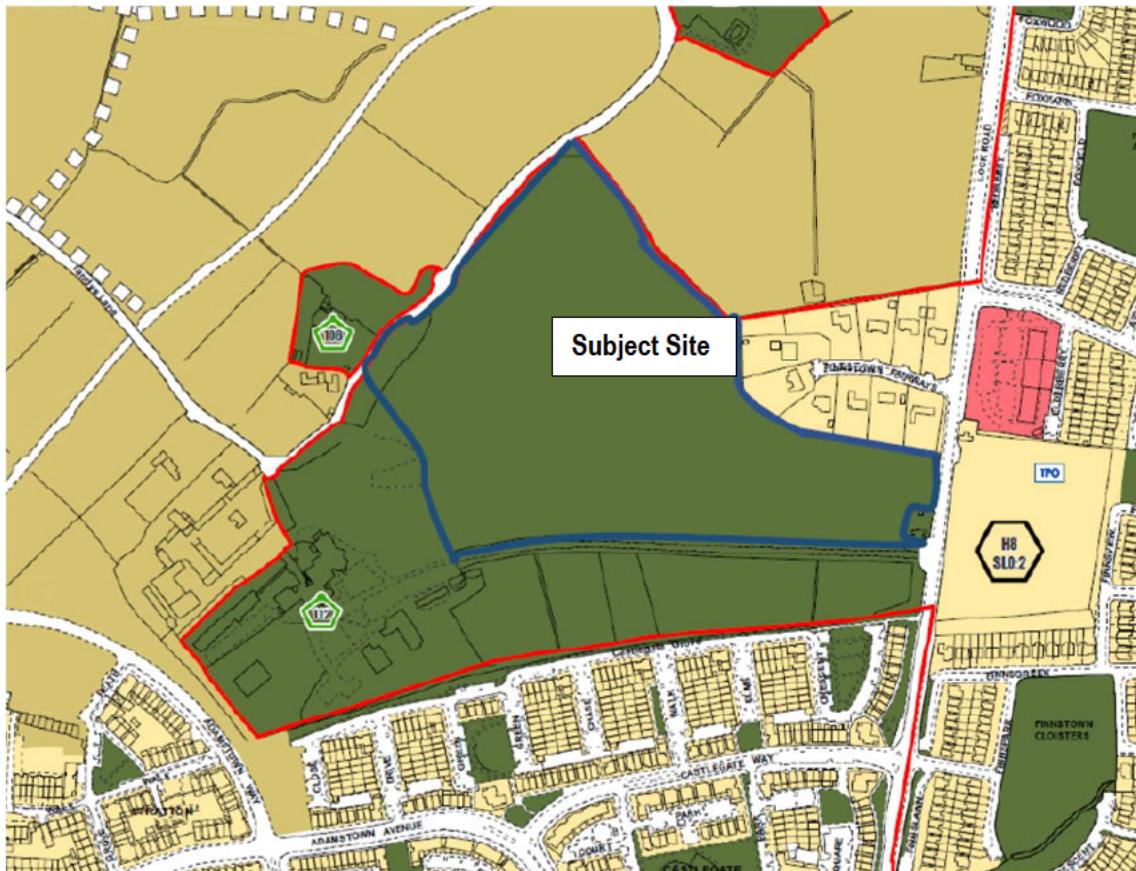


Fig. 1: Subject Site outlined in blue

2.3 The surrounding area of Lucan, south of the N4, has been primarily developed for residential purposes, mainly in the form of semi-detached housing. In more recent years, the development of Adamstown SDZ has evolved providing much needed housing in a variety of housing typologies.

2.4 Having examined the environs of the subject site, we consider that there are two parts to Lucan: **(i)** the original village, north of the N4 and **(ii)** the new expanded Lucan, south of the N4. Aside from Adamstown, the southern part of Lucan has been predominantly developed for housing, mainly in the form of 3 and 4 bed small semi-detached dwellings. To the east of Newcastle Road, land has been developed for housing, extending from Griffeen Park to Liffey Valley Business Park. This general area is now almost entirely built out with little to no vacant land available for the delivery of new housing.

2.5 In light of the foregoing, and upon an examination of the Draft Plan, it is put forward that the subject site at Finnstown is best placed to cater for new housing in this area. The Draft Plan states, in Chapter 2 “Core Strategy and Settlement Strategy”, that the Council has assessed all appropriately zoned lands with the potential for residential development and has applied a residential density for each site in line with Ministerial Guidelines, and that aside from the Long Term Strategic Lands (which includes the Adamstown SDZ), the land capacity reduces to 477ha with the potential to accommodate 23,731 units within the lifetime of the Development Plan period.

2.6 Figure 9 of the Draft Plan identifies the land capacity sites i.e. the extent of the total housing capacity sites on available already zoned lands. North of the M7, the major landbanks identified are Adamstown SDZ (considerably developed to date), Clonburris SDZ and Kilcarbery (committed in terms of an extant SHD permission). We note smaller pockets of land north and south of the N4 and it is put forward that some of these sites are already committed in terms of extant permissions and/or uses and therefore can not realistically be included as lands available for residential development in the new Development Plan and its Core Strategy.

2.7 On the north side of the N4, east of Ardeevin Avenue, there is an extant permission for 25 dwellings on lands proposed to be zoned “RES”. Immediately abutting same to the east/north-east are lands occupied by a number of buildings including the Lucan Centre and a Protected Structure on Primrose Lane. These lands are also proposed to zoned RES and accommodate approx. 5Ha. The lands subject to the extant permission Ref. SD18A/0310 ought be discounted from lands that are available for development.

2.8 To the east of the subject site, on lands located south of Castle Road and north and west of Balgaddy Road, these lands are occupied by educational uses including the Stewarts School and Lucan Community National School, that occupy c. 5Ha, all of which is proposed to be zoned “RES” in the Draft Plan.

2.9 To the north-east of the subject site, at Palmerstown, lands are proposed to be zoned “VC: To protect, improve and provide for the future development of Village Centres”. These lands are identified in Fig. 9 of the Draft Plan as having a housing capacity site, despite part of this landbank being occupied by a number of existing facilities such as Aldi and also lands that have an extant SHD permission (Ref. ABP-307092-20) for 250 no. build to rent apartments that are currently under construction. The VC lands occupy approx. 3.5Ha.

2.10 It is put forward that the above lands are not likely to be either developed for housing over the forthcoming Development Plan period and/or should not be included as available land to accommodate future housing by way of existing uses and extant permissions.

2.11 If we discount these areas i.e. approx. 9.5Ha, it is put forward that the transfer of these lands from the Core Strategy figures for new housing to be accommodated within the lifetime of the new Development Plan can be transferred to our client's lands which occupy an equitable land holding.

2.12 The subject lands are identified in the Draft Plan (Figure 10) as being within Dublin City & Suburbs, although they directly abut a MASP Residential Growth Area which is the Adamstown SDZ. The proposed zoning of the subject lands would tie in with this and with National Policy Objectives as set out in the 2018 National Planning Framework which is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. A key element of the NPF's strategy is compact growth with one of the key features being "Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas". The NPF sets out a number of objectives that promote coordinated spatial planning and sustainable use of resources and protection of the environment which include *inter alia*:

- **National Policy Objective 3a** - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;
- **National Policy Objective 4** - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being;
- **National Policy Objective 32** - To target the delivery of 550,000 additional households to 2040;
- **National Policy Objective 33** - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

2.13 It is put forward that the zoning of the subject lands objective RES-N would result in the delivery of an appropriate density of development of modern and adaptable new homes, within an existing urban area in close proximity to existing local service provision and public transport infrastructure, and would consolidate housing development in the environs.

2.14 The proposed zoning of the subject lands also accords with Rebuilding Ireland – Action Plan for Housing and Homelessness, 2016, which is the Government's Action Plan for Housing and Homelessness. The overarching aim of the Action Plan is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs. The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the Action Plan which states that: "locating housing in the right place provides the opportunity for wider family and social networks to thrive,

maximises access to employment opportunities and to services such as education, public transport, health and amenities, while delivering on sustainability objectives related to efficiency in service delivery and investment provision". The zoning of the subject lands in close proximity to existing residential areas and employment opportunities which is in line with the provisions of the Action Plan.

2.15 The Action Plan contains five key pillars of which Pillar 3 is most relevant in this instance. Upon the zoning of the subject lands objective RES-N, future residential development of same would be consistent with Pillar 3 to 'Build More Homes', as the lands could comfortably cater for housing on a greenfield site that enjoys close proximity to a wide range of facilities and services i.e. "Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices".

2.16 In light of the aforementioned committed sites and those identified as Long Term Strategic Lands, the subject lands present a perfect opportunity to zone lands in the Lucan area objective RES-N. The proposed zoning of our clients lands at Finnstown complies with the proper planning and sustainable development of the area given the locational context of same, and complies with national objectives to deliver housing in built up urban areas.

2.17 It is put forward that the current situation is that the only area of land not designated for development in the vicinity is the subject site which is comprised of privately owned lands that are currently zoned as open space yet not used for any recreational purpose, in fact the only use attached to these lands is agricultural. The lands have direct access onto the R120 Newcastle / Lock Road. Finnstown House Hotel and Grounds lie to the immediate south/south-west of these lands, with a cul de sac of detached houses at Finnstown Fairways bordering the lands to the north-east. The site also has access onto Tandy's Lane to the west/north-west which is to be integrated into an overall revised road network for the Adamstown SDZ which will regulate and control traffic, thus avoiding congestion when completed. The subject lands have been zoned for open space and recreational uses but have not been used for this use and therefore no longer serve any useful purpose and lie vacant and undeveloped. These undeveloped lands are ideally located for the provision of medium to high density housing (c. 35 – 50 units per hectare in line with national guidance) which will satisfy a current demand and will complement the overall character and pattern of development in the area, including the Adamstown SDZ.



3.0 Existing & Planned Services & Facilities

3.1 The proximity of the lands to a wide range of public transport including quality bus corridors and the train station at Adamstown will enable sustainable commuting for future residents to the city centre while new residential development in the area will support such investment in public transport infrastructure.

3.2 Directly opposite our client's lands is a Local Centre on the Newcastle Road, while to the north is the large Super Valu shopping centre on the District Centre zoned lands, both of which are within a 400m / 5 minute walking band, thereby providing proximate necessary local services. There are a number of educational facilities in the area, including new schools delivered at Adamstown. It is envisaged that our client's lands will cater for medium to high density (35-50 units per ha). In addition, investment in the community and social infrastructure planned for Adamstown will in time also provide for a wider range of facilities. The development of these lands as put forward in this submission fully accords with the proper planning and sustainable development of the area and the current zoning objective attached to the lands is an anomaly in the context of existing and planned development in the immediate environs. Development of these lands for housing will impose no traffic difficulties as the future road network planned for Adamstown provides for new north-south and east-west distributor roads to replace Tandy's Lane and Dodsboro Road thereby reducing the existing network to local access roads only. The development of these lands for housing will have no impact on overall traffic in an area that is planned to cater for circa 8,000 – 10,000 dwellings and associated services and facilities.

4.0 Conclusion

4.1 The proposal to zone our client's lands to cater for housing is in keeping with the character of this suburban area and will complement existing and planned residential development in the environs. Given the adjoining high density development of Adamstown, we consider that this infill pocket of land within this overall outer suburban area can be realistically developed for housing that is an efficient and sustainable use of existing services and facilities that are in the locality.

4.2 The development of these lands for residential land use is a sustainable option for this overgrown, unused, infill pocket of land, particularly in light of all of the necessary existing services and facilities within walking distance of this site. Judicious consideration needs to be paid to the fact that (a) while these lands are zoned for open space use they are in private ownership with no need or demand for these lands for open space / recreational use and (b) should the lands remain zoned for open space use they will remain unused and of no benefit to the wider



community, particularly in light of the fact that they are currently being grazed by cattle. The zoning of these lands will also consolidate development on the western side of the R120 within the existing development boundary of the county. There is also the option to deliver a portion of the lands for some form of community / recreational use that will tie in with the planned park for Adamstown but will also result in a tangible community gain for the area. By zoning the subject site for residential land use accords with the vision set out in the Draft Plan and its Core Strategy as there are a number of strategic housing sites located in the area that are not considered to realistically accommodate the future housing numbers identified in the Draft Plan. By transferring this quantum to our client's land, we consider that the zoning of the subject site for residential land use remains compliant with the Core Strategy and will enable housing to be realistically delivered in an urban area within the lifetime of the forthcoming Plan.

4.3 We request that all of the above be given judicious consideration at this opportune time of making a new County Development Plan and that upon the adoption of same, our client's site is zoned for residential land use i.e. Objective RES-N "To provide for new residential communities *in accordance with approved area plans*" as part of the South Dublin Development Plan 2022-2028.

Yours sincerely,



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Armstrong Fenton Associates.

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