

REZONING OF C. 8.1 HA OF LANDS FOR 'NEW RESIDENTIAL' AND 'OPEN SPACE' (HOUSING AND PLAYING PITCHES)

SUBMISSION TO THE:

**DRAFT SOUTH DUBLIN DEVELOPMENT PLAN 2022-2028
(MAP SHEET 10)**

DATE: WEDNESDAY, 15 SEPTEMBER 2021

Prepared for:

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EXECUTIVE SUMMARY: MAP 10

Purpose of Submission

The purpose of this Submission is to outline the rationale for the rezoning of lands east of Ballycullen Road, Dublin 16 from 'natural amenity' (Objective HA) to 'new residential' (Objective RES-N) and 'open space' (Objective OS), respectively.

Why the Lands should be rezoned to 'new residential' and 'open space'

1. Rezoning the Site will allow for the provision of much needed housing.

The northern c. 5.04 hectares portion of the Site has the potential to provide c. 200 No. homes at 40 No. units per hectare.

2. Rezoning the Site will allow for the provision of playing pitches for the local area and County.
3. Development on this site will 'complete' Ballycullen Road.

At present, development abruptly halts c. 200 m up the c. 450 m long Ballycullen Road.

We contend that a more logical development strategy would be to continue development along Ballycullen Road to provide a smoother transition from the urban to the rural.

4. Will facilitate public access to two protected structures and to a proposed 'Sites and Monuments Record Zone'.

The rezoning of the Site continues the logical expansion of housing adjacent to Abbotts Grove and along Ballycullen Road. Playing pitches at the southern end of the Site will help blend the boundary between the urban and the rural environment along with the retention of hedgerows and trees above the 120 m contour line.

(The Figures below are taken from the main body of the submission and illustrate what the current zoning is in the current *Development Plan* vs. what the **proposed zoning** is in the *Draft Development Plan* vs. what we **seek** in the *Amended Draft Development Plan*.)

We look forward to further engagement on this issue as part of the public consultation process for the *Draft Development Plan*.

ABOUT JONES INVESTMENTS LIMITED

'Inspiring environments built to the highest standards.'

Jones Investments is a niche player that identifies projects which are different and unusual, and stand out both for the company and the occupier.

Jones Investments strives to set new standards in every project endeavour. Throughout adverse times, Jones Investments has maintained a strong and steady investment portfolio and will build upon this established success to reach new heights in investment and development.

Jones Investments has a proven track record identifying projects that are unique and deliver environments that perform now and into the future. Feature projects include: The One Building in Dublin's CBD; The Dockmill purchased by Google Dublin in 2014; and Hanover Reach, former headquarters to Facebook's EMEA operations.

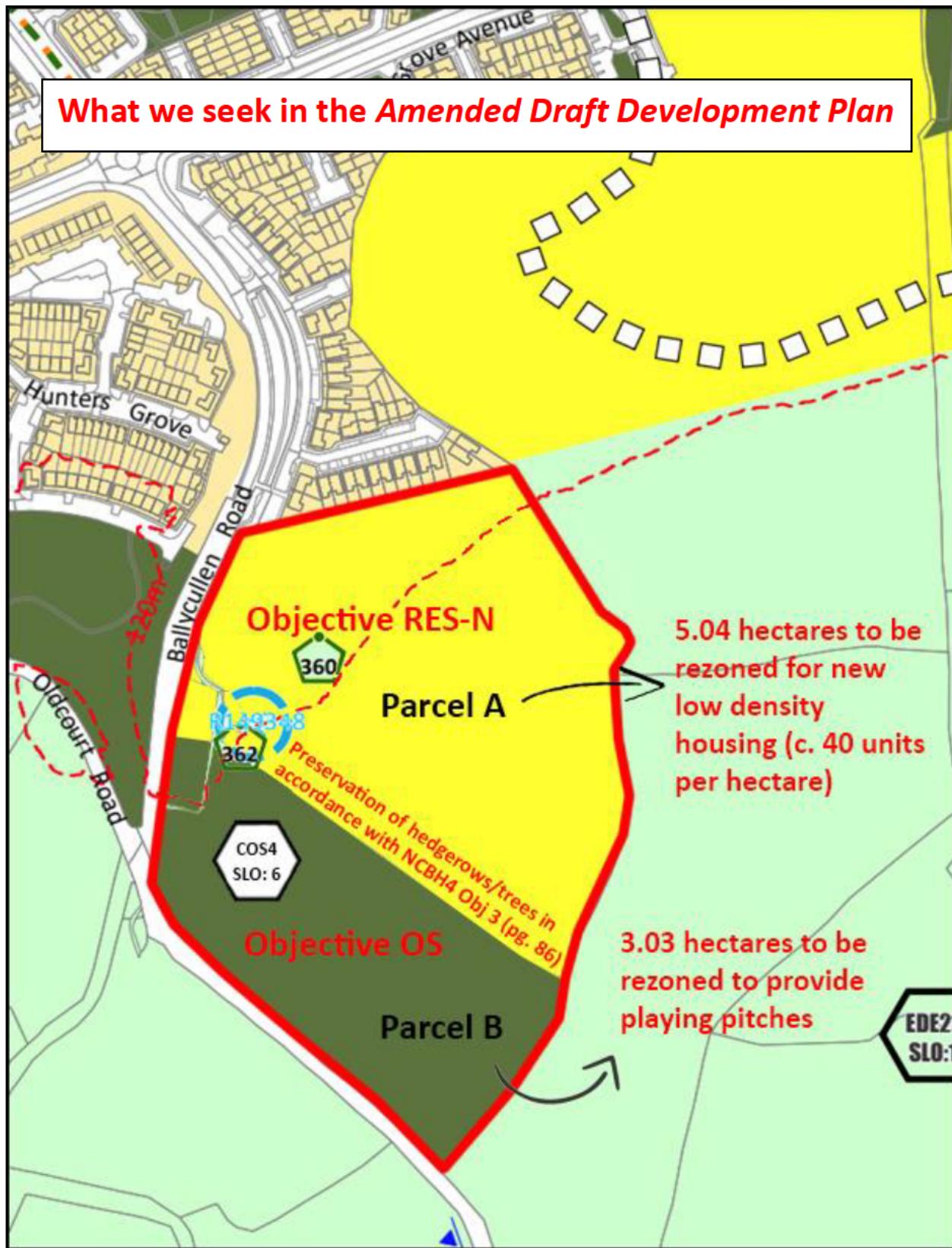
Jones Investments (formerly Ellier Developments Limited) has extensive experience in the Knocklyon area, being responsible for the delivery of a number of significant residential developments, including: Hunterswood (650 No. units); Woodstown Village (600 No. units); Dalriada (154 No. units); and Woodstown Shopping Centre.



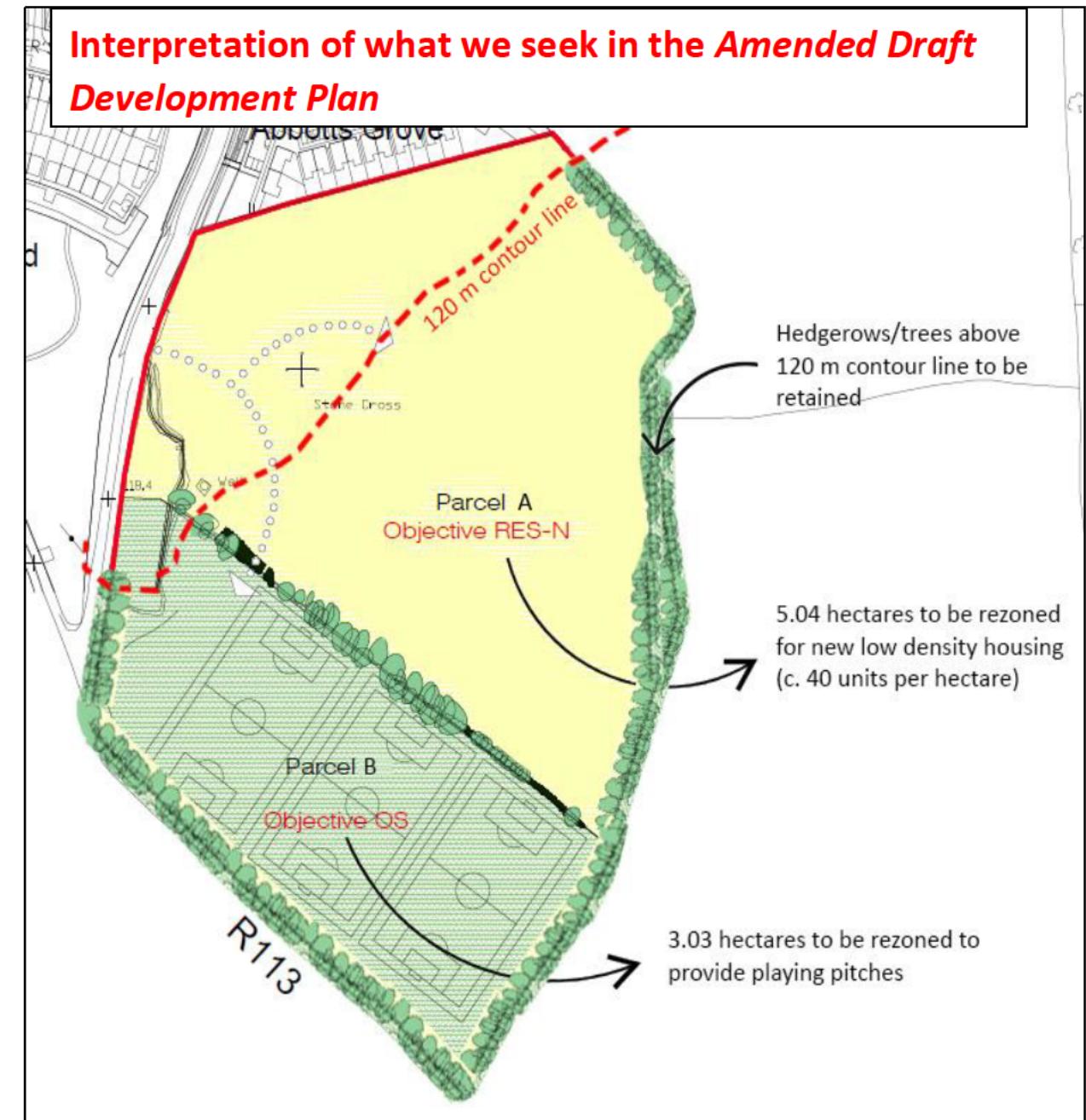
Current zoning for the Site. (Source: extract from Map 10 of the *South Dublin County Council Development Plan 2016-2022-Index Map*; annotated by TPA.)



Draft zoning for the Site. (Source: extract from Map 10 of the *Draft South Dublin County Council Development Plan 2022-2028-Index Map*; annotated by TPA.)
(The blue circle denotes a proposed 'Sites and Monuments Record Zone'.)



What zoning we seek for the Site. (Source: extract from Map 10 of the *Draft South Dublin County Council Development Plan 2022-2028-Index Map*; annotated by TPA.)



What we seek in the Amended Draft Development Plan. (Source: Duignan Dooley Architects Dwg. No. 16-021-PL-1.001; edited and annotated by TPA.)



Senior Executive Officer
Planning Department
South Dublin County Council
County Hall,
Tallaght,
Dublin24,
D24 A3XC.

Wednesday, 15 September 2021

Lands At Ballycullen Road, Dublin 16

[By Online Submission]

Dear Sir/Madam

RE: SUBMISSION REGARDING THE REZONING OF LANDS AT BALLYCULLEN ROAD

1.0 INTRODUCTION

1.1 Introduction

Jones Investments Limited¹ has retained Tom Phillips + Associates, Town Planning Consultants² and Duignan Dooley Architects³ to make a submission in respect of the *South Dublin County Council (SDCC) Draft County Development Plan 2022-2028*. (Figures 1.1 and 1.2.)

Our submission relates to a c. 8.1 ha site located east of Ballycullen Road, Dublin 16.

We seek that the Site be rezoned from 'natural amenity' ('Objective HA') to 'new residential' ('Objective RES-N') and 'open space and recreation' ('Objective OS'), respectively.

It is considered that this is a positive scenario for both the landowners and the local area/Council as it provides additional land for much needed residential housing and also provides playing pitches for the local area.

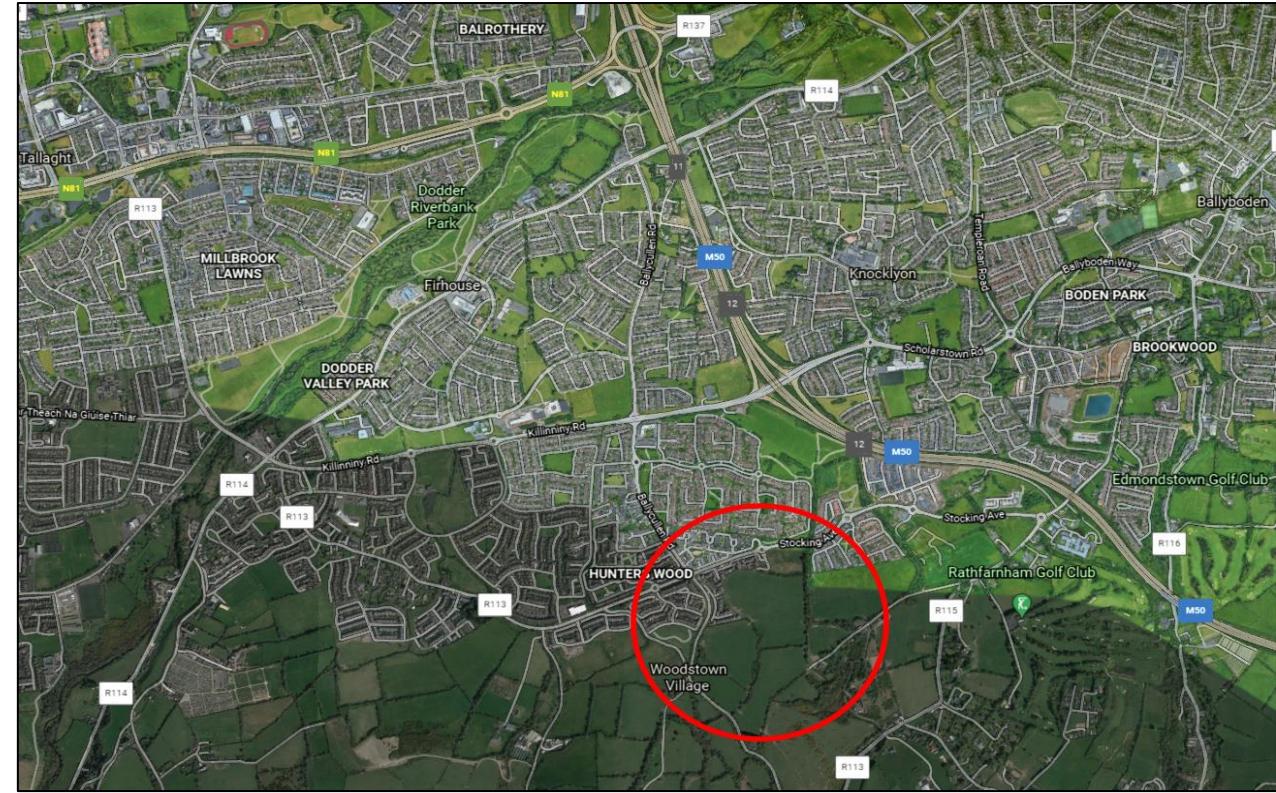


Figure 1.1: Location of the Subject Lands. (Source: Google Earth; annotated by TPA.)

This Submission firstly sets out the respective zoning objectives that:

1. Currently **exist** in the *South Dublin County Development Plan 2016-2022*.
2. Are **proposed** in the *Draft County Development Plan 2022-2028*.
3. We now **seek** in the *Amended Draft County Development Plan 2022-2028*.

This document then sets out the reasons for why we contend lands at Ballycullen Road should be rezoned 'new residential' and 'open space':

1. Rezoning the Site will allow for the provision of much needed housing.
The northern c. 5.04 hectares portion of the Site has the potential to provide c. 200 No. homes at 40 No. units per hectare.
2. Rezoning the Site will allow for the provision of playing pitches for the local area and County.
3. Development on this site will 'complete' Ballycullen Road.

¹ 33 Mespil Road, Ballsbridge, Dublin 4, D04 X027.

² 80 Harcourt Street, Dublin 2, D02 F449.

³ 62 Brighton Square, Rathgar, Dublin 6, D06 TV29.

At present, development abruptly halts c. 200 m up the c. 450 m long Ballycullen Road.

We contend that a more logical development strategy would be to continue development along Ballycullen Road to provide a smoother transition from the urban to the rural.

4. Will facilitate public access to two protected structures and to a proposed 'Sites and Monuments Record Zone'.

The rezoning of the Site continues the logical expansion of housing adjacent to Abbotts Grove and along Ballycullen Road. Playing pitches at the southern end of the Site will help blend the boundary between the urban and the rural environment.

1.2 Location and context of the Subject Lands

The Subject Site (c. 8.1 ha) is located east of Ballycullen Road, Dublin 16.

We divide the Site into two: Parcel A; and Parcel B.

Both parcels are greenfield.

Some 79% of the site resides above the 120 m contour line as outlined in the *Draft Development Plan*.

The entire site is currently zoned 'Objective HA' in the *South Dublin County Development Plan 2016-2022* and the *Draft South Dublin County Development Plan 2022-2028* – "To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains areas".

The Site lies adjacent to Hunterswood and Abbotts Grove Housing Estate.

Regarding heritage, the Site has a 19th Century Cross (RPS Ref. No. 360) and St Columbcille's Well (RPS Ref. No. 362) – both Protected Structures – located on the Site.

Additionally, the Well is a proposed 'Sites and Monuments Record Zone' (Map Ref. R149348) (Recorded Monument and Places Ref. DU022-028).

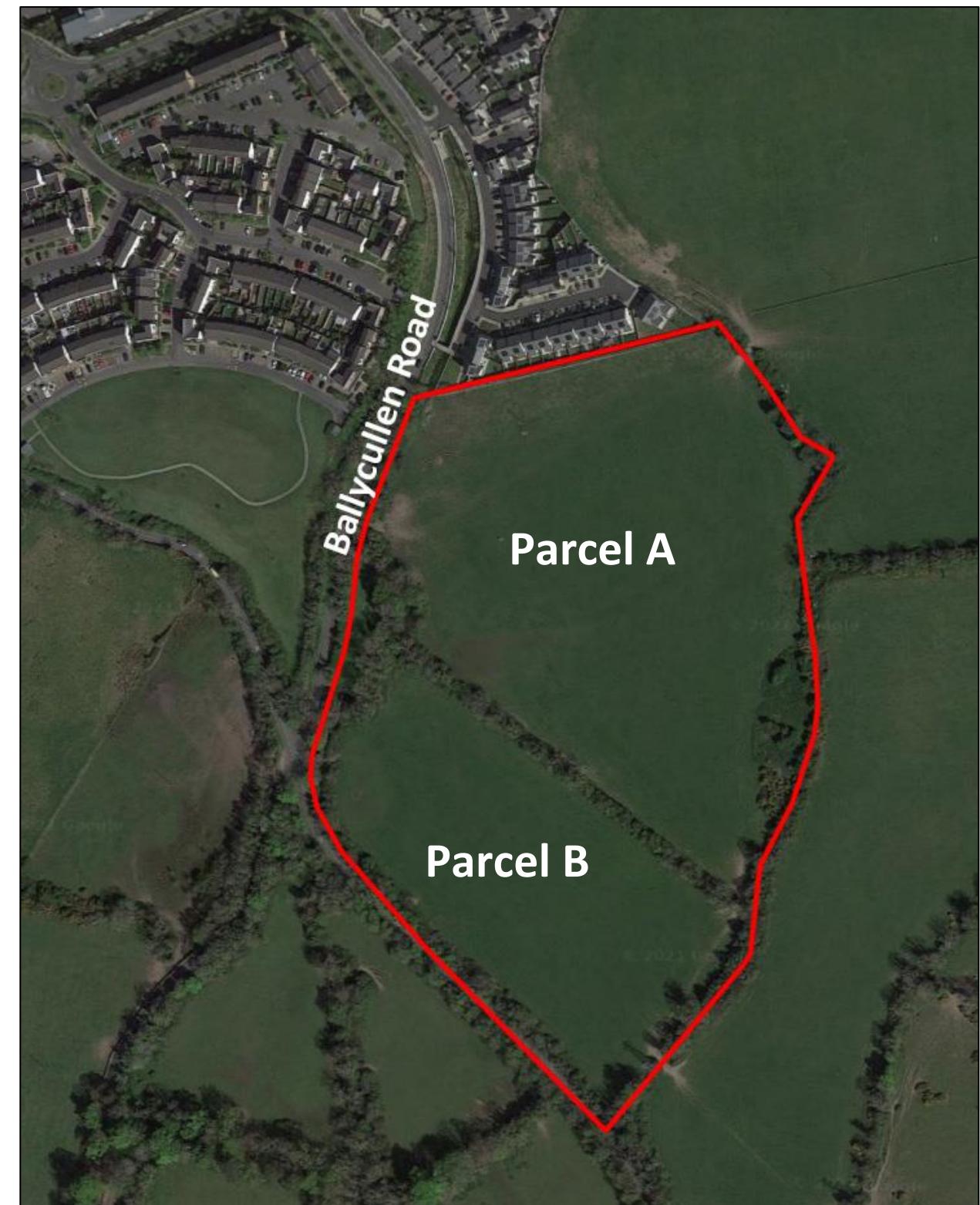


Figure 1.2: Location of Parcel A and B. (Source: Google Earth; annotated by TPA.)

1.3 Purpose of this Submission – to seek the zoning of ‘new residential’ and ‘open space’ land and the provision playing pitches

The purpose of this Submission is to seek the rezoning of lands from ‘natural amenity’ (‘Objective HA’) to ‘new residential’ (‘Objective RES-N’) and ‘open space’ (‘Objective OS’).

We seek lower density housing on this site as the *Draft Development Plan* states that:

“Proposals should ascend the contours of the site with unique design solutions such as lower density split level housing and sloping gardens with planted boundary treatments. Where changes in ground level between buildings are unavoidable, planted banks may be utilised.” (pg. 528.)

The *Draft Development Plan* quantifies ‘lower density residential development’ as “40 dwellings per hectare or below”. (Pg. 583.)

Thus, it is considered that this site (Parcel A) can provide c. 200 No. units at 40 No. units per hectare (lower density housing).

Playing pitches on the southern portion of the site will help blend the boundary between the urban and the rural.

We note that there is an objective in the *Draft Development Plan* that states that intact hedgerows/trees will be maintained above the 120 m contour line.

NCBH4 Objective 3 states that:

“To ensure that intact hedgerows/trees will be maintained above the 120m contour line within the County ensuring that the strong rural character will not be diluted and that important heritage features & potential wildlife corridors are protected.” (Pg. 86.)

It is considered that the proposed rezoning would facilitate this objective; the existing hedgerows and trees provide an excellent natural boundary for housing on Parcel A and playing pitches on Parcel B.

(Figures 1.3-1.5 that follow illustrate what the current zoning is in the current *Development Plan* vs. what the proposed zoning is in the *Draft Development Plan* vs. what we seek in the Amended *Draft Development Plan*.)

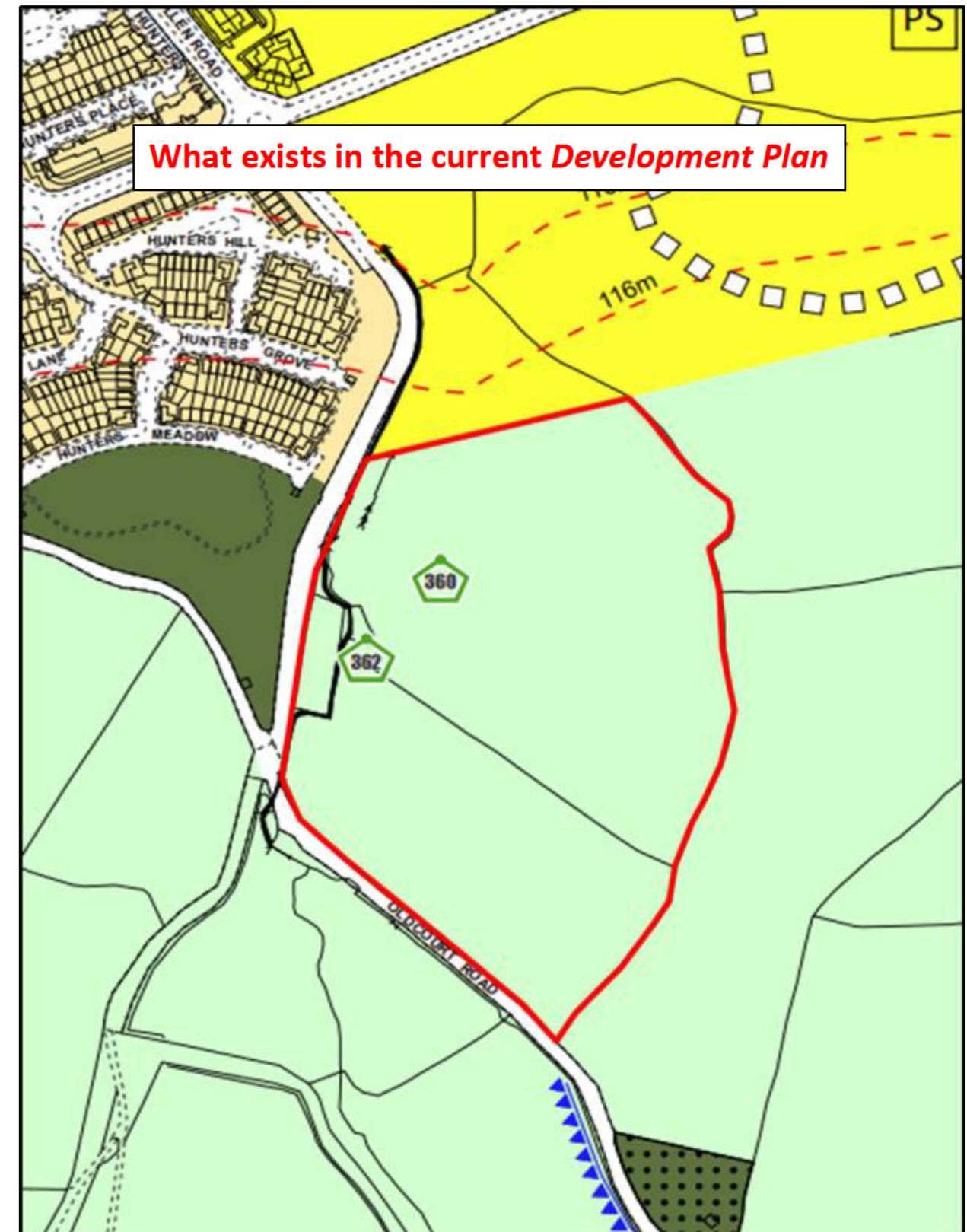


Figure 1.3: Current zoning for the Site. (Source: extract from Map 10 of the South Dublin County Council Development Plan 2016-2022-Index Map; annotated by TPA.)

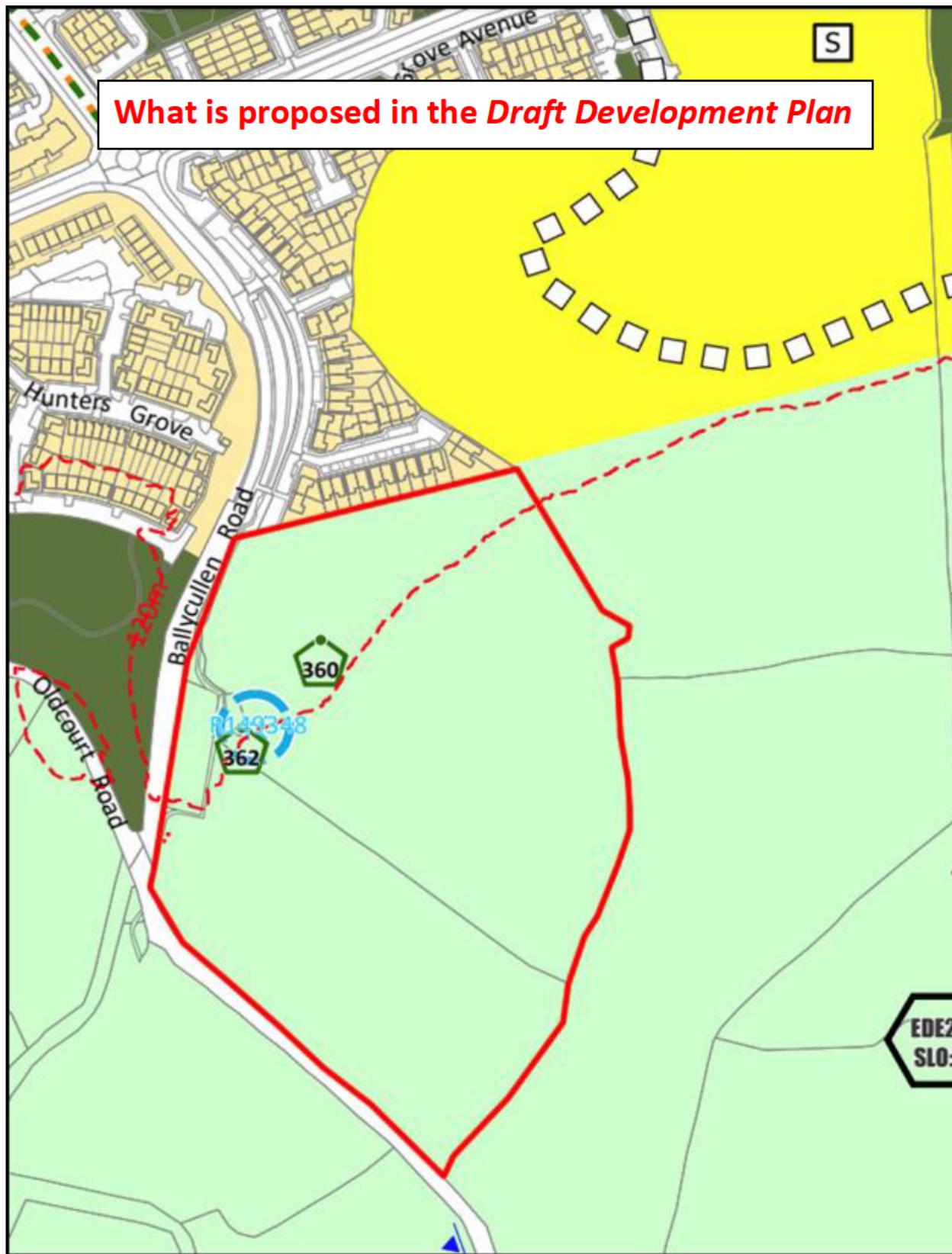


Figure 1.4: Draft zoning for the Site. (Source: extract from Map 10 of the *Draft South Dublin County Council Development Plan 2022-2028-Index Map*; annotated by TPA.)

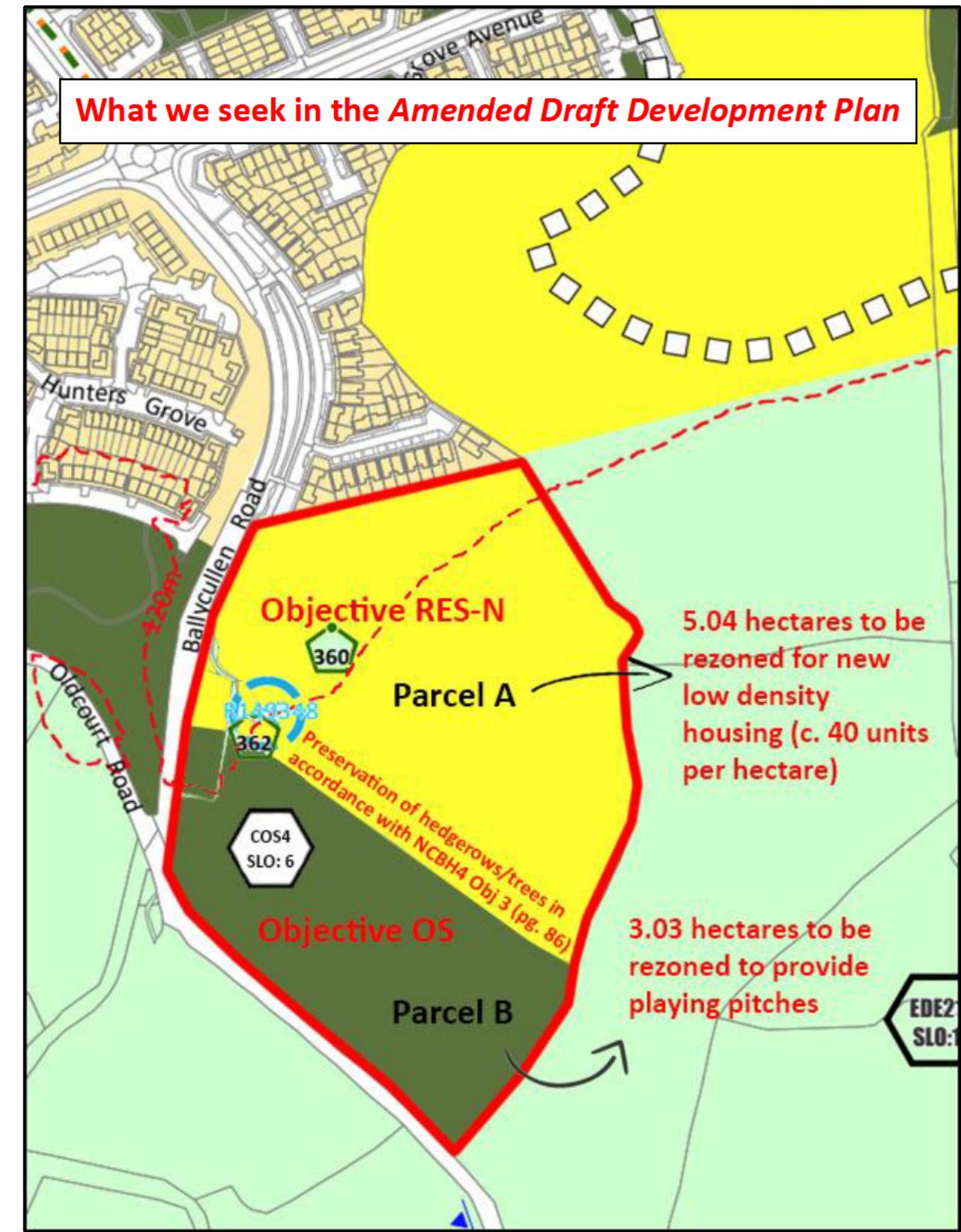


Figure 1.5: What zoning we seek for the Site. (Source: extract from Map 10 of the *Draft South Dublin County Council Development Plan 2022-2028-Index Map*; annotated by TPA.)

2.0 WHY THE SUBJECT SITE LANDS SHOULD BE REZONED

Sustainable development is described as meeting the needs of the present without comprising the needs of future generations. As such, to meet both the present population's housing needs, and the future population's housing needs, more homes must be built.

Sustainable development is a key objective of National and Local Planning Policy. The forthcoming *South Dublin County Development Plan 2022-2028* should aim to support sustainable development and provide much needed housing.

The Core Strategy of the *Draft South Dublin County Development Plan* should ensure that sufficient and correct quantum of lands are zoned at suitable locations within the County.

2.1 The urgent need for housing – 44% translation rate (potential for c. 200 No. homes on site)

Ireland is amid a housing crisis meaning that homes are needed urgently.

Parcel A on the Site can provide c. 200 No. homes while also allowing for the rural character of the site to be retained through the retention and maintenance of existing hedgerows and trees.

Ireland requires a housing supply of 33,000 No. new homes every year – as set out in the *Housing for All* (2021) initiative.

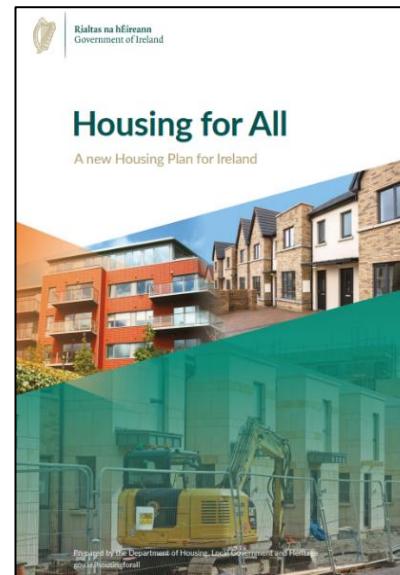
The Central Bank's 2021 Q1 Bulletin states that:

"housing output is down on pre-Covid expectations, completions are on course to reach approximately 18,500 new units in 2020."

Targets for 2020 were approximately 28,000 No. new homes. This inability to meet targets is expected to continue this year with construction having delays in the first several months of the year.

Through internal research, TPA has calculated that 42% of planning permissions nationally are eventually developed.

Specifically for South Dublin County Council, we have calculated that the administrative area has a permission-to-construction translation rate of 44%.



The *Draft Development Plan* also provides a similar statistic of 49%:

"Figure 7 below illustrates the number of sites with extant planning permission and of these, the quantum which are under construction per quarter since 2016 in South Dublin. The average trend indicates that half of sites (51%) with planning have not commenced. This could reflect a range of factors including market forces, permission sought to increase land value for re-sale, issues with sourcing the appropriate level of funding to commence construction, capacity of construction industry, etc. While COVID-19 has influenced this gap in terms of commencements, the trend of planning permissions relative to active sites (see linear lines in Fig. 7) was continuing to diverge by the end of 2020." (Pg. 42.)

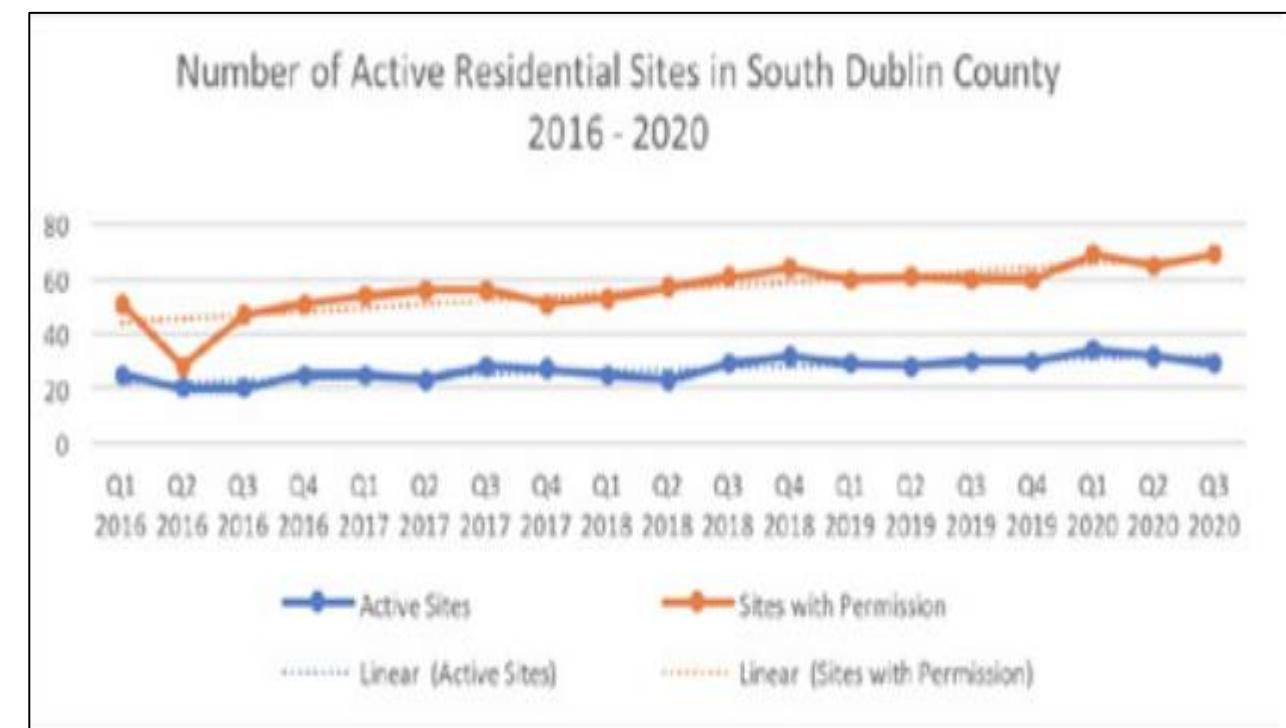


Figure 2.1: Figure 7 from the *Draft Development Plan*: Construction Activity of Residential Sites in South Dublin County. (Source: HTF Series 2016 – 2020.)

(See Figure 2.2, which illustrates the permission-to-construction translation rate for Dublin Councils and the wider Dublin region.)

Thus, we argue that an increased quantum of land must be zoned in order to meet the high quantum of homes (33,000) per year that are required as identified in the *Housing for All* initiative.

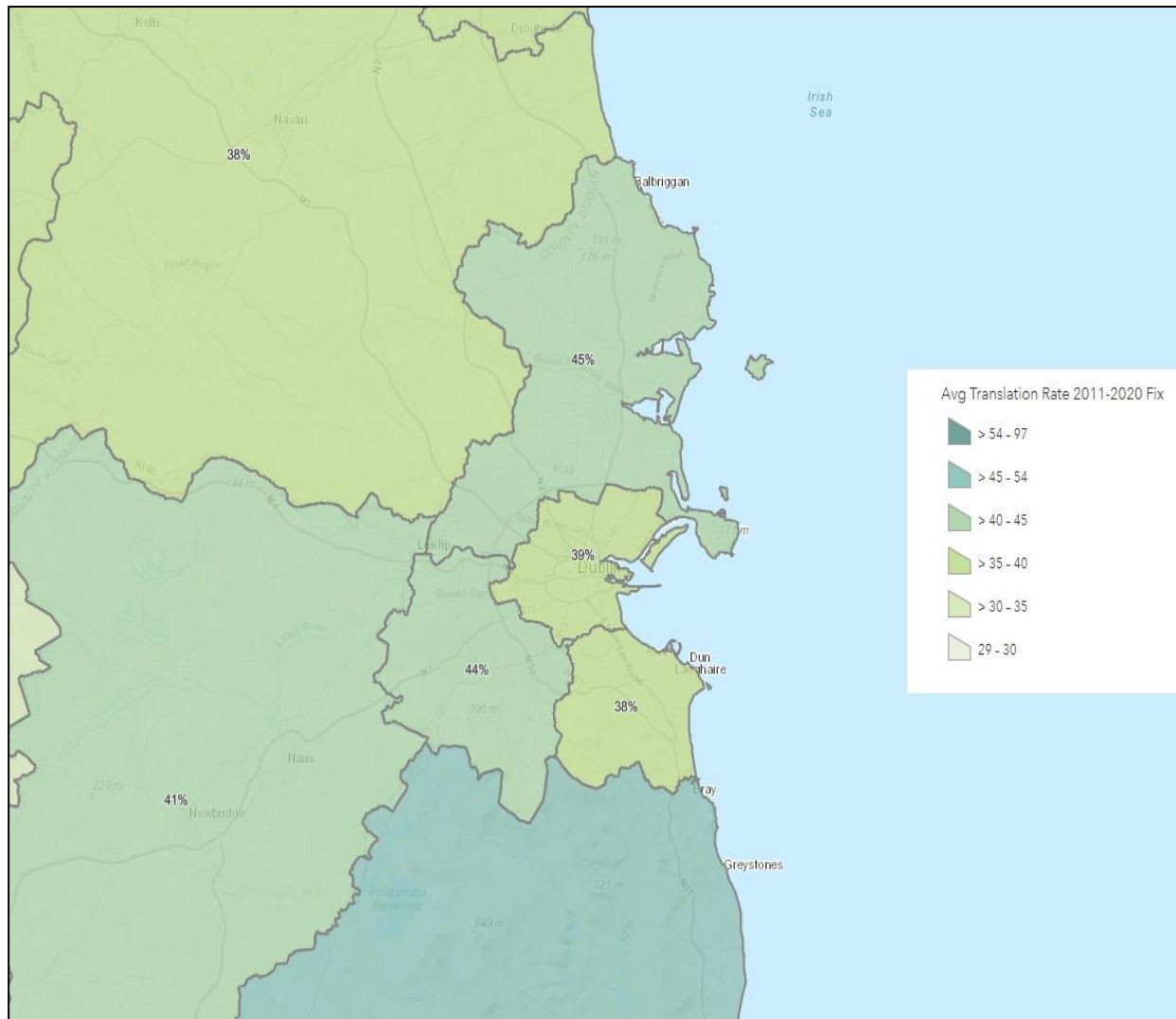


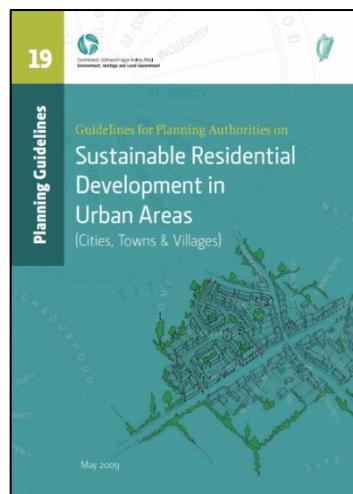
Figure 2.2: GIS map showing the permission-to-construction translation rate for Dublin Councils and the wider Dublin region. (Source: TPA internal research.)

Furthermore, this Site is suitable for the sustainable provision of housing due to its proximity to public transport.

Alongside the M50 motorway located within 1 km of the site, there are two Dublin Bus stops located approximately 500 m from the Site. These bus stops service the 15b Dublin Bus route that runs from Dalriada to Ringsend.

Regarding this, the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009), state that:

“Walking distances from public transport nodes (e.g. stations / halts / bus stops) should be used in defining such



corridors. It is recommended that **increased [housing] densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station**".

[Our emphasis.]

These bus stops provide direct sustainable transport into and out of Dublin City Centre for prospective residents.

We also note the future objective to support and encourage high-capacity public transport solutions for the area.

SM3 Objective 7 and 12 in the *Draft Development Plan* states the following, respectively:

***“To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.”* (Pg. 259.)**

[and]

***“To work with the NTA to secure the expansion of the bus network to serve new development and regeneration areas within the South Dublin County area including Tallaght, Naas Road, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle.”* (Pg. 261.)**

[Our emphasis.]

2.2 The demand for pitches is outlined in the *Draft County Development Plan* and *South Dublin County Council Sports Pitch Strategy Document 2020*

The *Draft Development Plan* states that:

“The Council recognises the importance of sports facilities for health and wellbeing and is committed to ensuring that all communities have access to a range of such facilities to meet a diversity of needs.” (Pg. 294.)

Furthermore, the *Draft Development Plan* states that COS4 Objective 1 is:

*“To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the *South Dublin County**

Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.” (Pg. 294.)

It is considered that Parcel B could accommodate 3 No. All Weather/Artificial Grass Pitches (AGP).

The *South Dublin County Council Sports Pitch Strategy Document 2020* states that:

“Latent training need not being met; increased usage places demand on grass pitches; consider move to All Weather Pitches for training needs as current demands not being met throughout the local authority.” (Pg. 15.)

These three pitches would serve the County and local community.

The *South Dublin County Council Sports Pitch Strategy Document 2020* further states that:

“Artificial Grass Pitches (AGPs). AGP’s can provide a vital asset to the local community in terms of training facility to local clubs and teams. The benefits of AGP pitches are outlined below:

- *Providing all weather, year-round facilities.*
- *Providing pitch capacity to meet increased population growth in higher density/urban locations.*
- *Meeting demand for increased match play.*
- *Meeting demand for training provision which is not currently being met.*
- *Removing training pressure from grass pitches with resultant higher standard of grass pitch.*

AGP’s have the ability to support far more matches and training sessions compared to regular grass pitches and can be strategically located in new development areas or high population areas.

AGP’s should be viewed as a community asset as they can support many segments of the population and offer a multi-sport approach through different sports. Each AGP has a travel time of 20 minutes where the optimum number of the population will travel to use the site. When new developments are being built AGP’s should be associated with these areas as typically this is where the younger population will increase.” (pg. 16.)

We emphasise the following from the above quote:

“AGP’s have the ability to support far more matches and training sessions compared to regular grass pitches and can be strategically located in new development areas or high population areas.”

[Our emphasis.]

Thus, we contend that this site serves as a strategic location for the development of Artificial Grass Playing Pitches due to its proximity to ‘new development areas’.

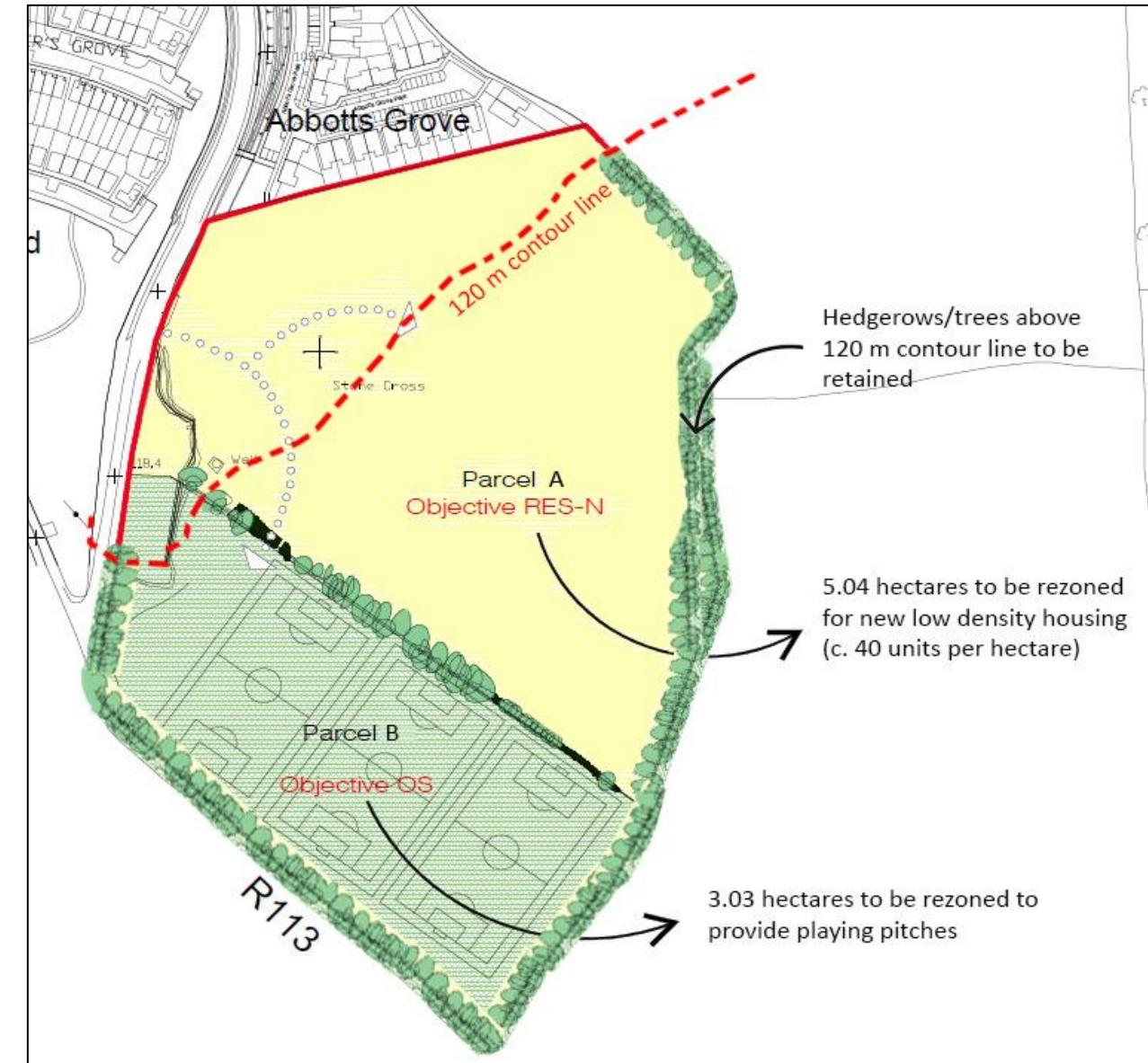


Figure 2.3: What zoning we seek for the Site, including Parcel B which could include 3 No. Artificial Grass Playing Pitches. (Source: Duignan Dooley Architects dwg. No. 16-021-PL-1.001; edited and annotated by TPA.)

2.3 'Completing' Ballycullen Road and transitioning from the urban to the rural

We contend that these lands should be zoned 'new residential' and 'open space' so that development can be 'complete' along Ballycullen Road.

Currently, the urban development/residential zoning suddenly and unreasonably ends after 'Abbots Grove'; however, we contend that this is not a justifiable location to terminate the zoning as it has caused an abrupt transition from the urban to the rural.



Figure 2.4: Street view image showing the abrupt transition from Abbots Grove (urban) to the natural amenity area (rural). (Source: Google Earth.)

The *Draft Development Plan* states that an "abrupt" transition should be avoided:

"(iv) Transitional Areas

Abrupt transitions in scale and use should be avoided adjacent to the boundary of land use zones. Development proposals in transition areas should seek to avoid development that would be detrimental to the amenities of the contiguous zone. For example, regard should

be had to the use, scale and density of development proposals in zones abutting residential or rural areas in order to protect residential or rural amenity, as appropriate." (Pg. 503.)

Although not directly located within the Dodder Valley – albeit within c. 1 kilometre of it – we note that NCBH8 Objective 5 is:

*"To protect the upper Dodder Valley from Old Bawn Bridge to Fort Bridge as an ecological network free from intrusive lighting, facilitating the protection of light-sensitive species availing of the river corridor, and **providing an appropriate urban/rural transition experience for all.**" (Pg. 94.)*

[Our emphasis.]

We contend that playing pitches – along with the retention of existing hedgerows and trees – at the junction of Ballycullen Road and R113 is a more logical land use and location to better transition from the urban to the rural environment.

(See Figures 2.5 and 2.6, which illustrate the existing 'bad' transition from urban to rural and our proposed 'good' transition from urban to rural.)



Figure 2.5: Aerial view of the current 'bad' transition at Abbotts Grove to the natural amenity area of the Subject Site. (Source: Google Earth; annotated by TPA.)

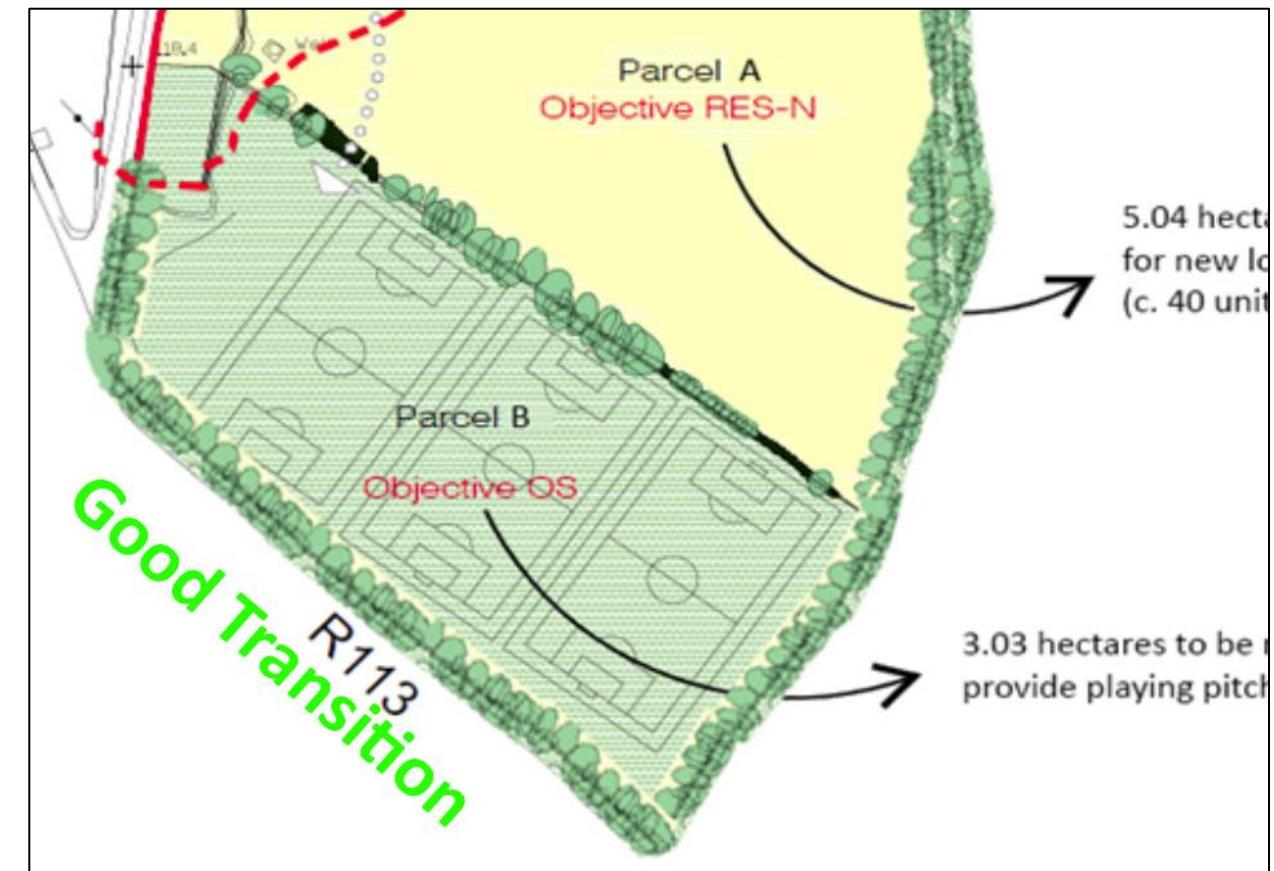


Figure 2.6: Plan view of what we seek illustrating our proposed 'good' transition from playing pitches to the natural amenity area. (Source: Duignan Dooley Architects dwg. No. 16-021-PL-1.001; edited and annotated by TPA.)

2.4 Will facilitate public access to two protected structures and to a proposed 'Sites and Monuments Record Zone'

The zoning that we seek will facilitate public access to two protected structures and to a proposed 'Sites and Monuments Record Zone'.

There are 2 No. protected structures on the Site, namely:

1. The Site has a 19th Century Cross (RPS Ref. No. 360); and
2. St Columbcille's Well (RPS Ref. No. 362).

Additionally, the Well is a proposed 'Sites and Monuments Record Zone' (Map Ref. R149348) (Recorded Monument and Places Ref. DU022-028).

At present, these two protected structures have no public access.

It is considered that cultural heritage should be encouraged in communities and that public access should be facilitated – albeit in a manner that safeguards the heritage.

The *Draft Development Plan* states that:

"The Regional Spatial and Economic Strategy (RSES) views cultural heritage as the fabric of our lives and societies, surrounding us in the buildings of our towns and cities, our landscapes, natural sites, monuments and archaeological sites, as something that brings communities together and builds shared understandings of the places in which we live."
(Pg. 101.)

[and]

"National Policy Objective (NPO) 17 of the NPF requires planning authorities to 'Enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations'."
(Pg. 102.)

[Our emphasis.]

If the land is rezoned to 'new residential', these heritage structures will form a central part of the community.

Figures 2.7 and 2.8 show the two protected structures.



Figure 2.7: St. Columbcille's Well. (Source: megalithicireland.com.)



Figure 2.8: 19th Century Cross. (Source: Ballycullen/Oldcourt LAP 2014 (extended).)

3.0 CONCLUSION

Failure to meet housing targets is a key issue for the forthcoming *South Dublin County Development Plan 2022 – 2028*. Sustained economic and social development is a particular concern regarding the challenges raised by the ongoing Covid-19 pandemic.

There is a need to ensure that a sufficient quantum of zoned Lands is available to meet housing targets set by the Government.

The reasons for why we contend the subject lands should be rezoned are, namely:

1. Rezoning the Site will allow for the provision of much needed housing.

The northern c. 5.04 hectares portion of the Site has the potential to provide c. 200 No. at 40 No. homes per hectare.

2. Rezoning the Site will allow for the provision of playing pitches for the local area and County.

3. Development on this site will 'complete' Ballycullen Road.

At present, development suddenly halts c. 200 m up the c. 450 m long Ballycullen Road.

We contend that a more logical development strategy would be to continue development along Ballycullen Road to provide a smoother transition from the urban to the rural.

4. Will facilitate public access to two protected structures and to a proposed 'Sites and Monuments Record Zone'.

I would be grateful to receive a formal acknowledgement of this submission in due course. If any queries arise in relation to this matter, please do not hesitate to contact the undersigned directly at this office.

Yours faithfully



Tom Phillips
Managing Director
Tom Phillips + Associates

Encl.
Appendices

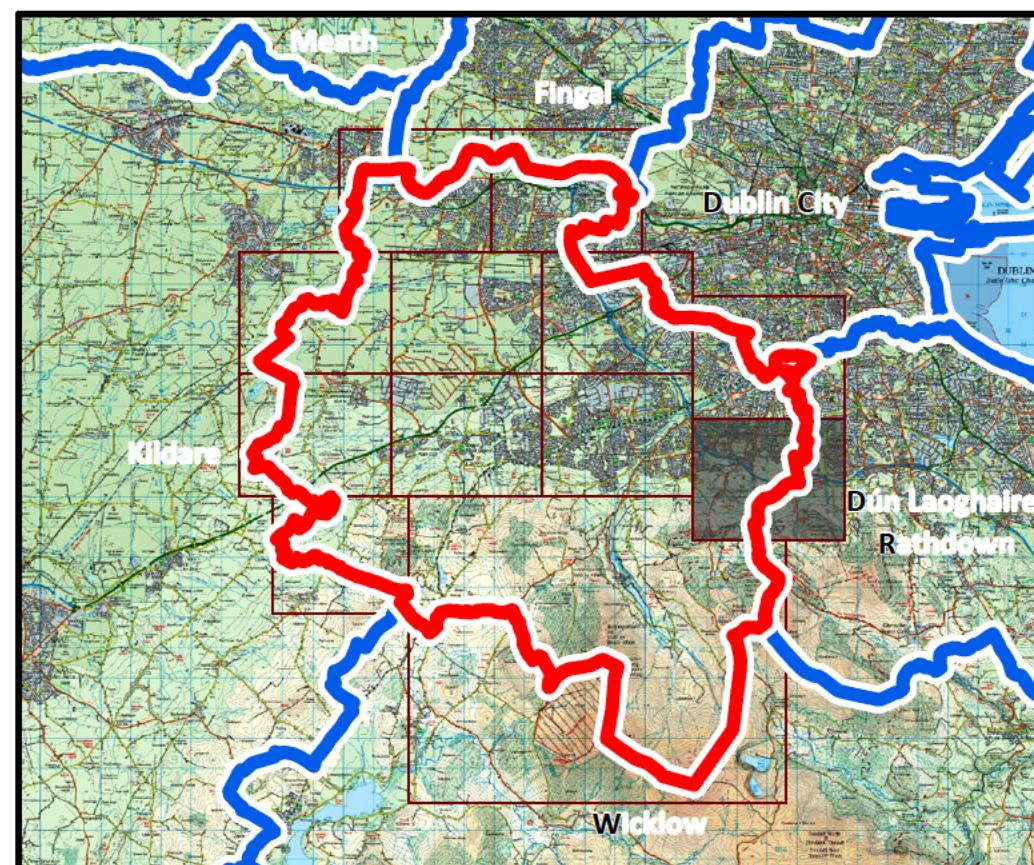
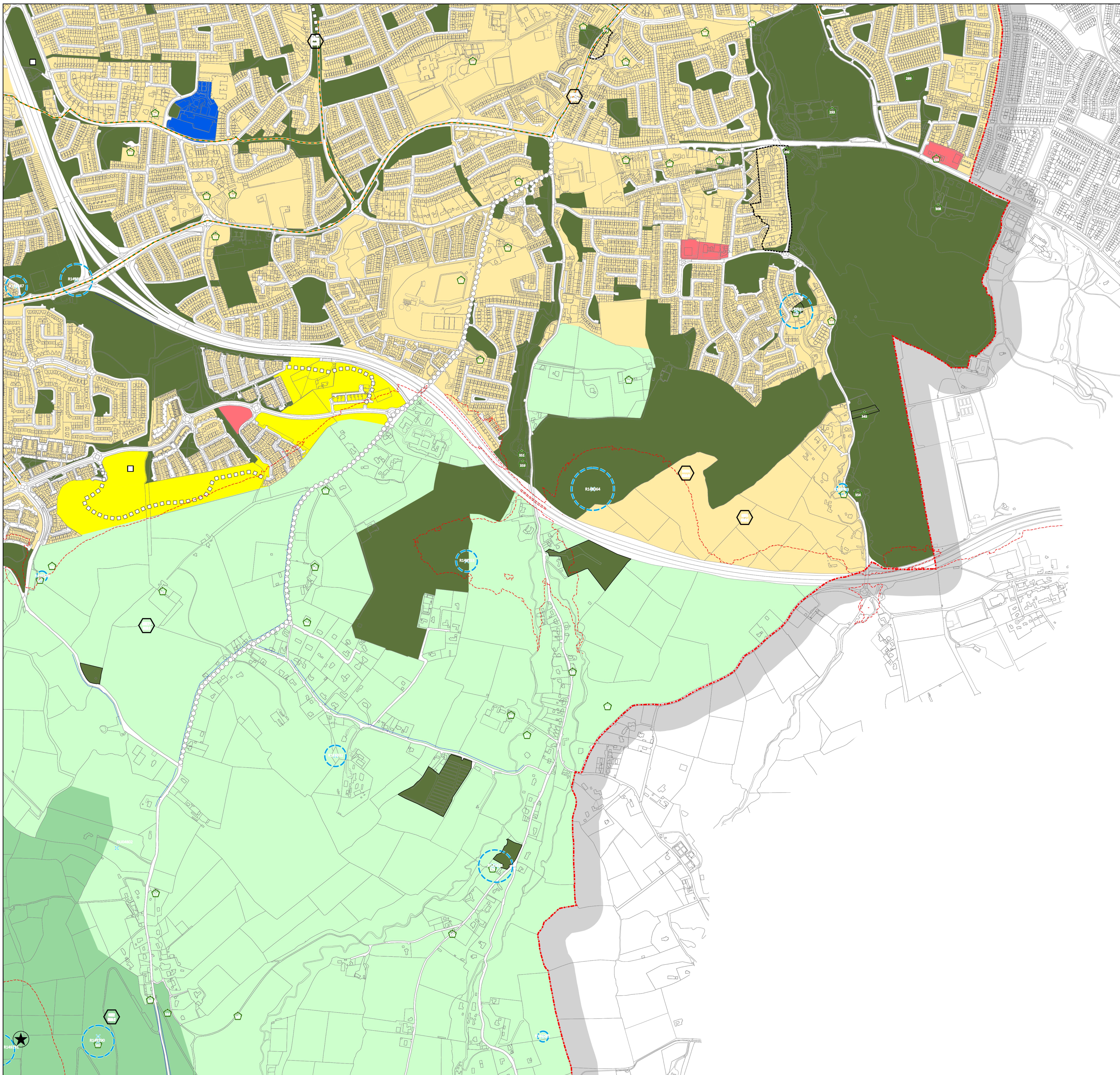
APPENDICES

(Following pages)

**APPENDIX A: WHAT WE SEEK (SOURCE: DUIGNAN DOOLEY ARCHITECTS DWG. NO. 16-021-PL-1.001;
EDITED AND ANNOTATED BY TPA)**



Appendix B: Map Sheet 10 DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028



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