



THORNTON O'CONNOR
TOWN PLANNING

Development Plan Submission

**Submission In Respect of the *Draft South Dublin
County Development Plan 2022-2028***

Relating to Lands at Newland Farm, Dublin 22

Submitted on Behalf of Hibernia REIT

September 2021

Senior Executive Officer
Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24
D24 YNN5

Wednesday, 15th September 2021

Dear Sir/ Madam,

RE: SUBMISSION IN RESPECT OF THE DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028 RELATING TO LANDS AT NEWLANDS FARM, DUBLIN 22.

1.0 INTRODUCTION

1.1 Purpose of this Submission – Demonstrate the Cogent Case that Exists to Rezone Lands at Newlands Farm to part Objective 'RESN' and part Objective 'REGEN'

Thornton O'Connor Town Planning¹ in association with Hendrik Van der Kemp² KPMG Future Analytics³ and OCSC Consulting Engineers⁴ have been retained by Hibernia REIT⁵ to prepare this Submission to South Dublin County Council in respect of the *Draft South Dublin County Development Plan 2022-2028*. The Submission relates to lands at Newlands Farm, Dublin and are shown in Figure 1.1 below.

The final day for submissions on this phase of public consultation is Wednesday, 15th September 2021.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14 D14 EA89

² No. 1 Woodstown Court, Knocklyon, Dublin 16

³ No. 1 Stokes Place, St. Stephen's Green

⁴ No. 9 Prussia St, Stoneybatter, Dublin, D07 KT57

⁵ 1WML, 1 Windmill Ln, Dublin Docklands, Dublin, D02 F206

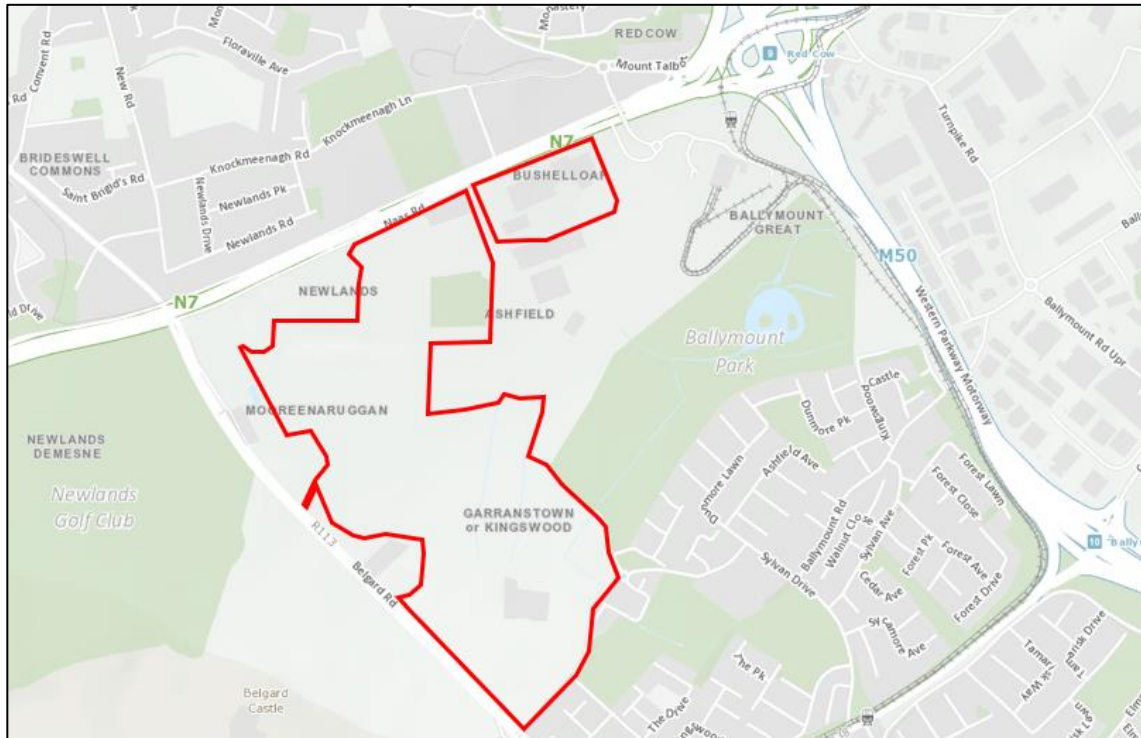


Figure 1.1: Map Showing the Location of the Lands Subject to this Submission (Outlined in Red)

Source: Myplan.ie, OSI Map, annotated by Thornton O'Connor Town Planning, 2021

Key Point: The key purpose of this Submission is to propose the rezoning of the subject lands currently part zoned Objective 'RU' (Rural Amenity) and part zoned Objective 'EE' (Enterprise and Employment). The lands are currently primarily functioning as fragmented farmlands, surrounded by urban development and in our opinion the rural land use zoning pertaining to the majority of the lands requires reconsideration having regard to the principles of sequential development and the changing urban morphology of the area with the subject lands now representing a relatively small and disjointed farm on highly accessible lands in a built-up area. The subject lands contain two Protected Structures that are in disrepair that are envisioned to be key features of any redevelopment of the lands ensuring their accessibility to the public and longevity into the future. The intensive agricultural use has had negative impacts on its biodiversity value and key tenet of any redevelopment proposal for the lands will be ensuring a net gain in its biodiversity value.

This submission thus presents the cogent case that exists to rezone the 53 Ha of Objective 'RU' lands at Newlands Farm to Objective 'RES-N' – *'To provide for new residential communities in accordance with approved area plans'* and to rezone the 5.7 Ha of Objective 'EE' lands at Newlands Farm to Objective 'REGEN' – *'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery,'* to allow for the delivery of a plan-led, mixed-use, sustainable development quarter that incorporates housing, offices, community and recreational uses on lands that are located adjacent to infrastructure and services and easily accessible to major public transport nodes.

As detailed throughout this Submission, the current Masterplan vision for the lands includes extensive open spaces to provide a community connected by green links including a substantive

east/west aligned green corridor which is intended to provide a physical buffer and a major amenity to existing communities in Kingswood. The subject scheme is also envisioned to provide services and community facilities to cater for both the new living and working communities envisioned and existing residential areas within the catchment of the subject lands.

We respectfully submit that the potential of the subject lands requires rigorous consideration due to their capability to be transformative in providing connected and sustainable communities adjacent to major public transport links.

The potential of the location of the lands for wayfinding and urban legibility also needs to be fully understood – the lands are positioned at the intersection of the M50 and the N7 – a key junction known as the 'Red Cow' due to a namesake hotel positioned on the opposite side of the M50. The subject lands which are envisaged to be designed to provide a high-end architectural solution have the potential to 'announce' the 'Red Cow' junction on its western side, also announcing a key entrance point to Dublin City and assisting in spatial identity.

The vision for the subject lands will be further described throughout this Submission and is graphically represented in the image below. A key gain to be noted is the proposal to extend Ballymount Park in a westerly direction providing a major green corridor through the southern portion of the site with the Protected Structure of Katherine Tynan house, to be restored and given a new community use identity in the heart of the open space.



Figure 1.1: Concept Drawing Demonstrating the Vision for the Subject Lands

Source: Urban Agency

1.2 Format of Submission

The following is the format of this submission:

Section 1 provides the **Introduction to the Submission**;

Section 2 provides an **Executive Summary of the Submission**;

Section 3 provides an **Overview of the Subject Lands – Location, Description and Accessibility, Biodiversity and Ecological Value**;

Section 4 sets out the **Unchanged Planning Status of Lands in the Current Development Plan and the Draft Development Plan**

Section 5 sets out the **Elected Members Consideration of Motions Pertaining to The Subject Lands**;

Section 6 Demonstrates the **Cogent Case to Rezone the Subject Lands to Provide a Plan-Led Sustainable Mixed-Use Development Quarter** that Incorporates Housing, Offices, Community and Recreational Uses;

Section 7 Interprets the **Core Strategy and Housing Need Assessment** and Addresses the **Challenge Presented by Zoned Lands Not Equating To Delivery**;

Section 8 outlines the Potential of the Subject Lands to **Present a Clear Solution to Act Now to try and Prevent the Further Exacerbation of the Housing Crisis in South Dublin**.

Section 9 provides the **Conclusion**.

2.0 EXECUTIVE SUMMARY

The subject lands at Newlands Farm are strategically positioned to avail of the benefits of high-capacity public transport infrastructure and existing services and facilities. However, the lands largely comprise fragmented farming fields that are inaccessible to the public. In our opinion their use is paradoxical to their location as the lands are strategically positioned with ease of access to high capacity public transport (2 No. Luas stops) in addition to multiple bus services. The lands are also located at the Gateway to Dublin from the N7 and have the potential to physically denote a key junction, aiding in urban legibility and providing architectural interest on a key arterial route to and from the city. From a sequential analysis perspective, the lands are located contiguous to lands developed for residential and industrial development yet have been leapfrogged by zoning in the Draft Plan.

Our Client and their retained design team are struggling to understand the rationale for this zoning decision. We respectfully question why the retention of fragmented zoned agricultural lands is considered appropriate at a location that virtually straddles two Luas stops? Agricultural industry does not benefit whatsoever from proximity to public transport and thus the agricultural use of the lands seems to be a completely ineffective and unsustainable use of such strategically positioned core urban land. We suggest that retaining farming use at the subject lands can only contravene all national policy discourse to focus urban growth on Transport Orientated Development (TOD). It should further be noted that farming on the urban edge has proved unproductive due to regular disturbance and disruption caused by anti-social behaviour due to a lack of passive surveillance at the lands.

We note that two Councillors submitted motions seeking an unchanged zoning status at the subject lands. We have reviewed the motions and comment that the concerns about changing zoning at the lands are linked to opinion on their biodiversity value and their 'greenbelt' nature. Whilst we fully appreciate the Councillors concerns and their imperative to protect biodiversity, we note that in making such comments the Councillors do not have the benefit of specialist assessments and have not had the opportunity to walk the subject lands to understand its use or ecological value and thus comments made in the writing of the motions do not accurately reflect the ecological status of the subject lands. The subject lands do not provide a greenbelt but in fact largely provide agricultural lands that are farmed and inaccessible to the public. JBA Consulting Ecologists surveyed the site on two occasions and confirmed that *'No sightings of protected species were recorded'*. The subject lands are currently in intensive agricultural use which does not allow for the regeneration of flora and fauna. The envisioned redevelopment of the subject lands will create public open space and suitable lands for biodiversity regeneration which is not currently possible under the current land use (intensive agriculture), in tandem with providing urgently needed homes in a highly sustainable location.

A key benefit of the development vision for the subject lands is a significantly increased green corridor envisaged by the extension of Ballymount Park in a westerly direction across the subject lands. This green link will entail more than 16 hectares of a singular tract of the subject lands functioning as open space infrastructure and will be a key gain for the local community. The green link will also have dual purpose as it is also envisioned to act as a buffer zone, physically separating any new development at the subject lands from the existing community at Kingswood. Importantly, the 16 hectare parkland extension will be fully accessible to existing communities.

Newlands Farm is envisaged to provide an exemplar scheme of living sustainably in a compact designed environment with ease of access to multiple modes of public transport and walking distance to shops and services. Newlands Farm can act as a 'catalyst' for more sustainable development- showing how South Dublin County Council and Hibernia REIT embraced the need for change and demonstrated how to provide a highly sustainable 'best in class' development quarter at a time when the country's population continues to rise and future generations continue to be at risk of being locked into car dependence and long commutes with associated negative impacts on climate change.

This Submission includes a Land and Housing Capacity Report conducted by Hendrik Van der Kamp, which identifies that much of the Objective 'Res-N' zoned lands in South Dublin has been zoned 'Res-N' since 2004 and has continuously failed to deliver housing over the 18 year period from 2004-2022. Should such lands continue to be zoned when it is eminently clear that they are highly unlikely to deliver much needed housing over the Plan period? This Report also raises concerns about the extent of headroom allowed for and the implications of insufficient headroom in exacerbating the imbalance between demand for and supply of housing. Additional caution is expressed in respect of population projections up to 2031 – it is considered that they are too low and underestimate the reality of growth of development in the EMRA region.

The Land Housing and Capacity Report further considers the risks of using a household size that is not reflective of the changing population demographics and demonstrates that if a more realistic household size figure of 2.4 is assumed, the amount of zoned land that is needed would be twice the amount that is provided for in the Draft Plan. Similarly, research prepared by KPMG Future Analytics entitled '*An Assessment of Housing Need Calculation in the Draft South Dublin County Development Plan 2022-2028*' has been enclosed as an Appendix to this Submission. This research assesses a single, but extremely important variable used in the South Dublin Housing Need Demand Assessment (HNDA) related to the application of Average Household Size (AHS). The research provides the justification for a more evidenced 2.5 pph target, over 2.74 pph considering the range of demographic, housing market and policy factors that better illustrate the lack of unit development obstructing smaller household sizes forming, and perpetuating the larger AHS that exists.

We respectfully comment that these issues need to fully interrogated– the Plan is for a six year period and if mistakes are made the consequences of these errors will be long-lasting. Serious pent-up demand for housing will exist that could affect multiple generations. We urge South Dublin County Council to fully consider the role that Newlands Farm could have in the creation of sustainable and transport orientated homes in South Dublin.

3.0 OVERVIEW OF THE SUBJECT LANDS – LOCATION, DESCRIPTION, ACCESSIBILITY, BIODIVERSITY AND ECOLOGICAL VALUE

3.1 Site Location - Overview

The subject lands are bounded to the north by the N7, to the west by Belgard Road, to the south by Ballymount Road and to the east by Ballymount Park and the Red Cow Luas Park and Ride facility further beyond. The subject site is ideally located in close proximity to the Luas Park and Ride facility at the Red Cow as the easterly boundary of the subject lands are situated just 350m (c. 4 No. minute walk), as the crow flies, from the facility. The southern portion of the lands also benefit from the proximity of the Belgard Luas station which is 600m (c. 7 minute walk) to the south.

The wider surrounding area includes a broad range of services and amenities. Tesco Clondalkin is located within a 17 No. minute walk (c. 1.3km) to the north west of the subject lands. There is a Neighbourhood Centre located within a 13 No. minute walk (c. 1km) to the south of the subject lands at the junction of Sylvan Drive and Ballymount Road. The Neighbourhood Centre is comprised of approximately 10 No. commercial units including, but not limited to, a local shop with a delicatessen and post office, a café, a pharmacy and a takeaway. Furthermore, Kingswood Community College and St. Kilian's National School are situated within a 11 No. minute walk (c. 850 metres) to the south of the subject lands. The below image sets out the surrounding context of the subject lands:

Key Point: The subject lands are strategically positioned to avail of the benefits of high-capacity public transport infrastructure and existing services and facilities. The subject lands, which are currently in private use and thus not available to the general public, have the potential to play a major role in increasing permeability and connectivity in the local area through the provision of the cyclist and pedestrian infrastructure that will link the various neighbourhoods surrounding the subject lands.

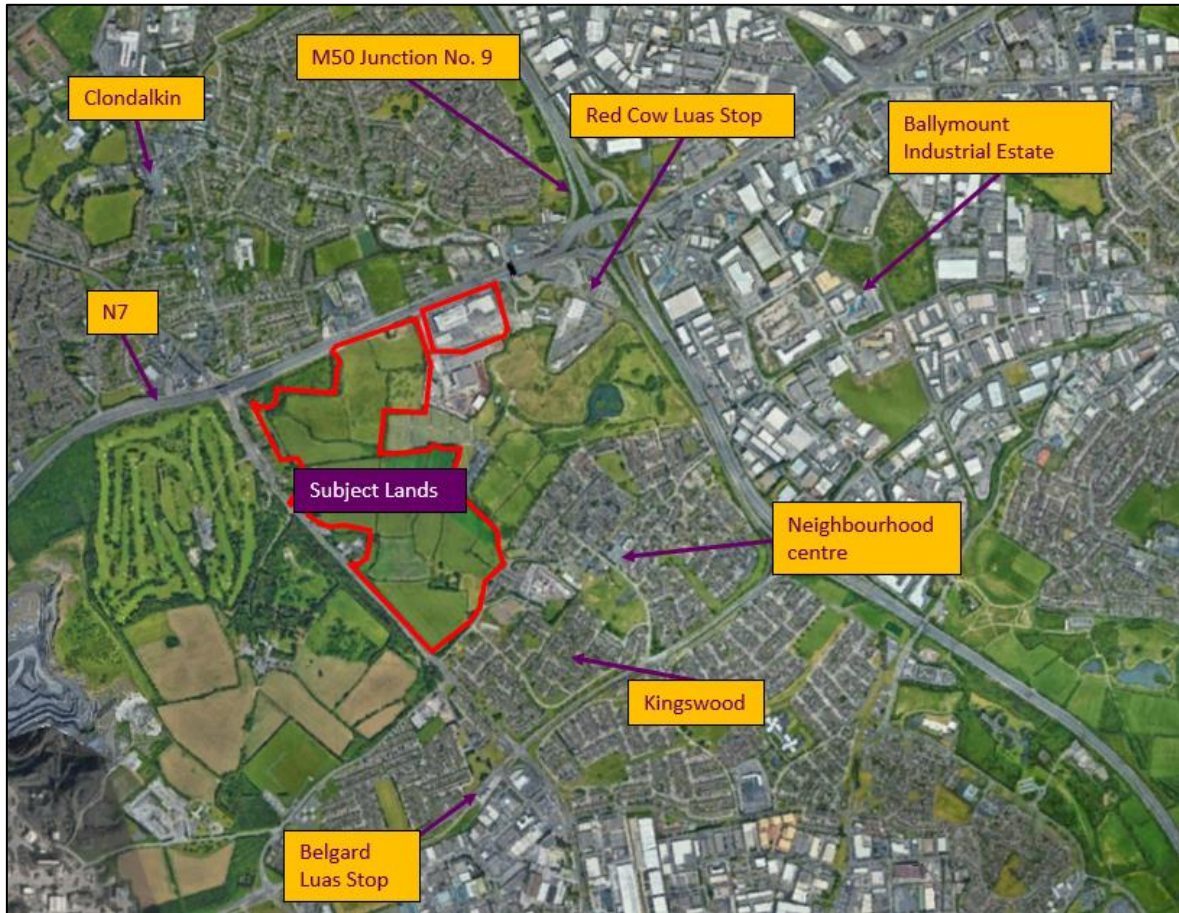


Figure 3.1: Aerial View of the Subject Lands (Outlined in Red) and Surrounding Context

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021

3.2 Site Description and Current Uses

The subject lands, which measure 58.7 Ha, are irregular in shape. The currently zoned Objective 'EE' lands in the north eastern corner are industrial in nature and the currently zoned Objective 'RU' lands to the west are currently greenfield and currently being farmed. More specifically, the Objective 'RU' lands are currently farmed for cereals and grazed by livestock and represent remnant green space at a key entrance point to Dublin City.

A number of photographs of the subject lands showing their view from the N7 have been included below for reference:



Figure 3.2: Image of Currently Zoned Objective 'RU' Lands as Viewed from Naas Road to the North

Source: Google Streetview Imagery



Figure 3.3: Image of Currently Zoned Objective 'EE' Lands as Viewed from Naas Road to the North

Source: Google Streetview Imagery

Key Point: We submit that the current use of the majority of the lands for agriculture is completely discordant with its location. Why are fragmented agricultural lands required on lands that virtually straddle two Luas stops? Agricultural industry does not benefit whatsoever from proximity to public transport and thus the agricultural use of the lands seems to be a futile use of such strategically positioned urban land.

Another consideration in addition to use and sustainability is urban form. The N7 is a key arterial route into Dublin from many regional nodes and currently presents a weak frontage as demonstrated by Figures 3.2 and 3.3 above. We wish to highlight that this frontage could be transformed if the subject lands were rezoned – providing high end higher density buildings that provide a strong outlook of the subject lands and ‘announce’ one’s arrival at the city edge.

3.3 Site Accessibility

The subject lands are well served by sustainable modes of transport which will be detailed throughout this section of the submission:

3.3.1 Luas – Subject Lands are Easily Accessible to Two Stops

Located 350m (c. 4 No. minute walk) from the easterly boundary of the subject lands and 600m (c. 7 minute walk) from the southern boundary, the Luas Red Line, which begins in Saggart/ Tallaght and terminates at The Point in Dublin City Centre, has an average frequency of 4 No. minutes Monday-Friday, 10am to 4pm. The Luas Green Line is also reachable in 28 No. minutes from the Red Cow Luas Stop providing further accessibility across Dublin as shown in the Figure below:

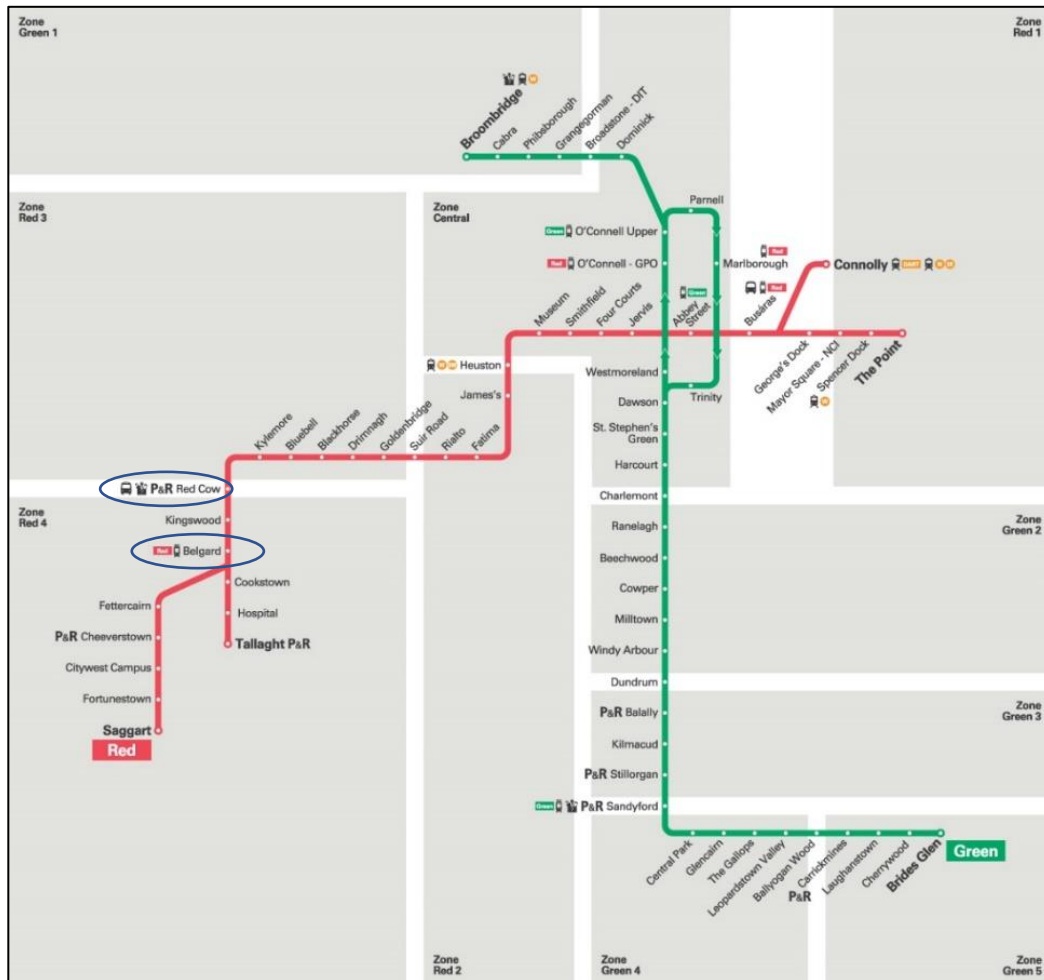


Figure 3.4: Luas Network Map, 2019 with the Red Cow Stop Circled in Blue

Source: Luas.ie

3.3.2 Existing Bus Services- Multiple Bus Services Serve the Subject Lands

The subject lands are currently served by a range of bus services operated by Dublin Bus and Go Ahead Ireland. The following bus routes of note serve the subject site:

Along the northern boundary:

- **Dublin Bus Route No. 68:** Hawkins Street to Newcastle. 1 No. hour frequency, 7.30am-5.30pm, Monday-Friday.

Along the western boundary

- **Go Ahead Ireland Route No. 76:** Tallaght to Chapelizod. 20 No. minute frequency, 7.55am – 11.50pm, Monday-Friday.
- **Go Ahead Ireland Route No. 76A:** Tallaght to Blanchardstown. 7 No services daily, Monday- Friday.

Along the southern boundary

- **Dublin Bus Route No. 56A:** Ringsend Road to Tallaght. 75 No. minute frequency, 7.20am-11.30pm, Monday-Friday.

From Red Cow Park & Ride Facility: Dublin Coach

- **726:** Dublin to Portlaoise. 24hr 60 No. minute frequency, Monday-Sunday.
- **300:** Dublin to Tralee. 120 No. minute frequency, 8.30am-5.30pm, Monday-Sunday.
- **600:** Dublin to Cork. 120 No. minute frequency 5.05am-9.05pm, Monday-Sunday.

From Red Cow Park & Ride Facility: Other Operators

- Bus Éireann and JJ Kavanagh & Sons also service the Red Cow Luas Park and Ride with daily services to destinations including Waterford, Wexford, Tipperary, Kilkenny and Dublin Airport.

3.3.3 Proposed Bus Connects

Bus Connects is a national program for investment in the bus network of the Greater Dublin Area. The emerging plan for this significant upgrade involves two parts:

- Core Bus Network Redesign (New Routes/ Improved Frequency/ More Buses); and
- Core Transport Corridor Upgrades (240km of upgrades over 16 No. Quality Bus Corridors, including cycle lanes and bus priority).
- Integrated ticketing and fares with Luas, DART and Commuter Rail.

Proposed Network Redesign

Following the initial proposed network redesign in 2018, a revised bus network redesign was published in October 2019 and includes 8 No. Route Spines (with additional spurs/branches), increased local/ feeder route coverage, orbital routes, and peak-time only express services.

With regard to the subject site, the following is the emerging preferred route network that will potentially open the site up for greater access to parts of the city it is currently more removed from, increasing employment opportunity and access to services and amenities.

As can be seen in the Table below, the following proposed bus routes are of relevance to the subject site:

Preferred Bus Routes		
Bus Route:	Destinations:	Weekday Frequency:
Route Spines		
Route No. G1:	Red Cow - City Centre - Spencer Dock	15 No. Minutes (6am – 10pm)
Orbital Routes		
Route No. W2:	Liffey Valley - Clondalkin - Tallaght	15 No. Minutes (6am – 10pm)
Other City Bound Routes		
Route No. 60:	Red Cow - Cherry Orchard - Decies Rd. - Spencer Dock	1 No. Hour (6am- 11pm)

Route No. 71:	Tallaght - Ballymount - Warrenmount - East Wall	30 No. Minutes (6am -10 pm)
Local Routes		
Route No. L54:	River Forest - Lucan - Clondalkin - Red Cow	30 No. Minutes (6am -10 pm)
Route No. L56:	Newcastle - Clondalkin - Red Cow	1 No. Hour (6am- 11pm)
Peak-Only/ Express Routes		
Route No. X55:	Clondalkin - City Centre - Ringsend	3 No. expected services in the morning and 2 No. expected services in the evening.

The following network diagram depicts the proposed revised network servicing the subject lands:

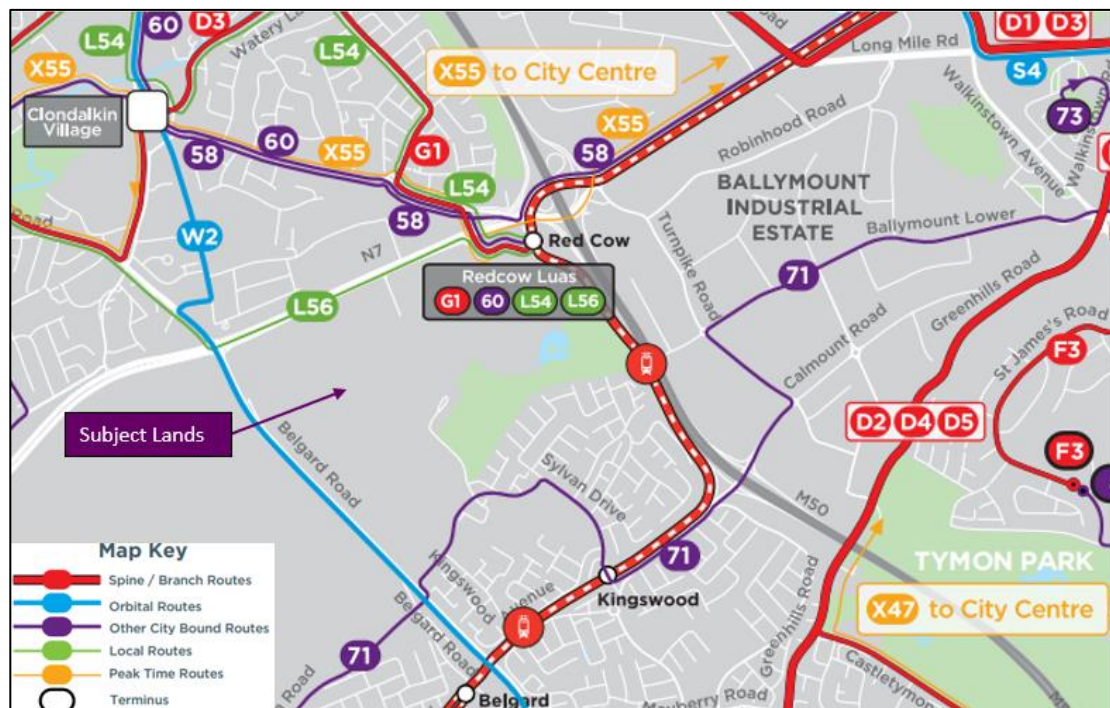


Figure 3.5: Proposed Bus Routes in the Vicinity of the Subject Site (Routes Listed Above Highlighted)

Source: Busconnects.ie, Revised Network September 2020, annotated by Thornton O'Connor Town Planning, 2021

3.3.4 Bicycle Infrastructure

There is existing bicycle infrastructure in the form of bicycle lanes provided along the Naas Road and Belgard Road surrounding the subject site however, improvements to the network are expected as part of the National Transport Authority's 'Greater Dublin Area Cycle Network Plan (2013)'. The NTA Greater Dublin Area Cycle Network Plan (2013) has been further supported by the National Development Plan 2018-2027, Ireland 2040: National Planning Framework (2018), the Regional Spatial and Economic Strategy for the East and Midlands

Regional Authority 2019-2031 and the *Climate Action Plan 2019*. Local and National Government support for this network plan has continued into statutory documents.

There is a wide network of cycling infrastructure envisaged for the Metropolitan area and the following Figure 3.6 details the layout of this network in the vicinity of the subject site:



Figure 3.6: Bicycle Network in the Vicinity

Source: *NTA Greater Dublin Area Cycling Network (2013)*, annotated by Thornton O'Connor Town Planning, 2021.

Primary route No. S05 passes along Belgard Road and will see added segregation for cyclists along this stretch. Similarly, a feeder route along the Naas Road has already been completed, connecting Secondary route No. 7E to Primary route No. S05.

These bicycle infrastructure proposals bode well for any future development of the subject lands as residents and/or workers will benefit from a combination of light rail and active travel mobility options, presenting an opportunity to implement bicycle-train intramodality in Ireland; an approach which has proven very successful in countries such as the Netherlands.

Key Point: Whilst the clear accessibility benefit to the site is its very close proximity to two Luas stops and a Park and Ride facility, the site also benefits from regular and various bus links (which will be upgraded by Bus Connects) and an envisioned strong network of cycling infrastructure. This major investment in public transport that embraces the subject lands does not benefit farming in anyway.

Retaining farming use at the subject lands will also contravene efforts to development Transport Orientated Development (TOD). TOD is defined by the National Economic & Social Council (NESC)⁶ as:

*'A form of urban development that seeks to **maximise the provision of housing, employment, public services and leisure space within close proximity to transport nodes** (e.g. rail and/or bus) that are serviced by frequent, high quality services. It is also a form of urban development that is **well aligned with Ireland's international and national policy positions**, and with recent institutional developments in relation to active land management by the State.'* [Our Emphasis].

Transport Orientated Development maximises the potential of investment in public transport and contributes to the provision of more affordable housing, the transition to a more sustainable transport system and the delivery of compact and higher quality urban development.

The National Economic and Social Council further elaborate that Ireland has an ongoing commitment to the *United Nation's 2030 Agenda for Sustainable Development* and to implementing the Sustainable Development Goals (SDGs). One of these goals – sustainable cities and communities – recognises increased urbanisation around the world, and is based on a recognition that *'sustainable development cannot be achieved without **significantly transforming the way we build and manage our urban spaces**'*. [Our Emphasis].

At a more micro level scale, we are strongly of the opinion that South Dublin County Council need to embrace the concept of Transport Orientated Development and the planned future populations should be positioned having due regard to this concept which underpins a move to a more sustainable future.

We cannot fathom how the continued use of the strategically positioned subject lands as farmland can be considered sustainable and we urge South Dublin County Council to fully recognise the accessibility benefits of the subject lands and the potential the lands could play in providing an exemplar model Transport Orientated Development for South Dublin.

3.3.5 Road Network

The subject lands benefit from excellent access to the wider road network surrounding Dublin including the N7 and the M50 Motorway (Junction No. 9) which is reachable in 2 No. minutes from the subject lands. Access to the M50 Motorway also enables relatively short journey times to a number of Motorway and National Primary Routes that radiate from Dublin as they begin at their junctions with the M50.

⁶ [Transport Orientated Development | The National Economic and Social Council - Ireland \(nesc.ie\)](https://www.nesc.ie/en/publications/transport-orientated-development)

3.4 Heritage and Conservation Importance

There are currently 2 No. Protected Structures located on the subject lands (RPS Refs. 172 & 197). RPS Ref. 172 is a Farm Building (brick built), located at Newlands Farm and RPS Ref. 197 relates to a House at Whitehall, Ballymount Road, (Katherine Tynan House).

These Protected Structures provide instant character value to the lands. Unfortunately, given the current use of the subject lands as agriculture, the Protected Structures are not in use and have been the subject of regular anti-social activity owing to the lack of passive surveillance surrounding the structures. Our Client has incurred considerable expense continually resecuring the structure.

Key Point: The restoration and reuse of the Protected Structures is key to the Masterplan vision for the subject lands. These historic buildings are proposed to be restored to provide community uses which will allow them to become accessible to the general public, thus allowing the general public to appreciate their historic significance and character value. Such restoration will also ensure the survival of the structures for the enjoyment of future generations.

Images of the two Protected Structures are provided below for reference:



Figure 3.8: Protected Structure Farm Building (RPS Ref.: 172)

Source: Thornton O'Connor Town Planning



Figure 3.9: Protected Structure Two Storey House (Katherine Tynan House) (RPS Ref.: 197)

Source: Thornton O'Connor Town Planning

It should be noted that there is a live application pertaining to Katherine Tynan House (SDCC Reg. Ref.: SD21A/0148). The application proposes to change the use of the structure from disused dwelling to a community centre. If granted permission, the works will be implemented as part of any future redevelopment of the lands. The works will entail refurbishment of the roof and external walls; reinstatement of windows and external doors; ceilings and floors; reinstatement of a conservatory and glazed porch; new internal stairs and doors; new services and sanitary accommodation; two new single storey open-fronted structures on part of the footprint earlier outbuildings with an enclosed area for toilets; refurbishment of historic garden walls and gates; upgrading of the existing non historic entrance and approach from the Ballymount Road; and provision for parking on site. On 29th July 2021, South Dublin County Council issued a *Request for Further Information* in respect of the proposal which relates to issue including future use, ecology, roads, surface water and boundary treatments.

We note that the South Dublin County Council Conservation Officer in their assessment of the proposals considered that:

'The reuse of the existing building promotes the sensitive reuse and upgrading of a Protected Structure and a long-term use for the site. It is felt that the proposed development has been well considered in accordance with good conservation practice and principles to achieve a high quality sustainable development.'

Thus, it is clear that proposals to ensure the long term use of the property are welcomed. The implementation of development at Katherine Tynan House is dependent upon the rezoning and development of Newlands Farm as a community building could not operate in isolation at this location in the midst of a fragmented farm.

3.5 Ecological Value of Subject Lands.

JBA Consulting have undertaken an ecological walk over of the site on 7th and 11th August 2020 and confirmed that:

'The proposed site mainly comprises arable fields and improved grasslands with mature hedgerows and treelines as field boundaries. There are several drainage ditches and an eroding stream along the field boundaries, all of which are feeding into Coolfan Stream which connects to Camac River further downstream. There are mature woodlands along the borders of the site; one in the north-west, one in the centre towards Newlands Cross Cemetery and two in the south. There are some areas with scrub, most prominently a field in the north-east with a mosaic of grassland and scrub.'

JBA confirmed that 'No sightings of protected species were recorded' and 'In total five invasive non-native plant species were recorded during the ecological survey. None of these species are listed on the third schedule of the EC (Birds and Natural Habitats) Regulations 2011 S.I. No. 477/2011.'

Key Point: Any future development at the subject lands can be planned in conjunction with the ecologists to respect and enhance the ecological value of the habitat for species.

3.6 Understanding the Current Biodiversity Value of the Lands and Potential to Increase Biodiversity

There is an emerging assumption as part of the rezoning motions (discussed in Section 4.0 of this report) that retaining the current zoning of the subject lands will benefit biodiversity in the Clondalkin and Kingswood area. This assumption ignores the limited ability intensively farmed agricultural lands play in the protection of biodiversity.

The 2019 State of Nature report⁷ prepared by the Sustainable Food Trust is a health check on how the UK's wildlife is faring and puts together wildlife data from a group of 50 No. conservation organisations. The report discusses the negative impact agriculture has had on biodiversity in recent times:

'Agriculture has been identified as the most important driver of biodiversity change over the past 45 years, with most effects being negative.'

The report points out that it is not the productivity that has caused the problem, but the intensive farming practices that generate that productivity.

⁷ <https://sustainablefoodtrust.org/articles/bringing-biodiversity-back-into-farming/>

'At the heart of this lies a shift from traditional mixed farming to a specialisation in either arable or livestock, at the same time as an increase in farm size. With fewer crop species being planted and the loss of nature-friendly features such as meadows, ponds and hedgerows, wildlife habitats have been directly impacted. Without crop rotations that are associated with mixed farming, farmers rely on nitrogen fertiliser, creating 'green deserts' of flowerless monocrop pastures and waterways polluted by agricultural run-off. Monocultures, now synonymous with modern farming, are more susceptible to disease and pests and require chemical inputs to protect them – so much so that pesticide applications have doubled in the last 25 years. Among these pesticides are the now restricted neonicotinoids. One study has linked the chemical to a 75% decline in insects in German nature reserves, and it is now widely accepted to have caused a decline in vital pollinators that are essential for three quarters of crops in the UK. In addition, a change in cropping patterns and an increase in stocking rates have all taken their toll.'

Hibernia REIT have an in-house Sustainability Director, Mr. Neil Menzies, who has provided inputs to this Submission on the topic of Biodiversity. The *Draft Biodiversity Action Plan* (BAP) for South Dublin County 2021-2025 breaks down the action plan into three key areas of concern

1. **Getting to know what we have** - surveying and mapping habitats and species in the county, identifying high nature value areas and local biodiversity spots, mapping the county's Green Infrastructure, locating and managing non-native invasive species.
2. **Telling the story** - connecting with nature around us, encouraging awareness and community involvement in biodiversity projects, celebrating and promoting the county's biodiversity, communicating our objectives and our achievements, undertaking biodiversity research studies.
3. **Leading the way** - good governance, addressing the threats to biodiversity in the county by striving for better implementation of local, national, and international biodiversity policy and action for climate change

The subject lands and their future potential have been categorised using the headings provided in the *Draft Biodiversity Action Plan* as shown in the table below:

<p><u>Getting to know what we have" at Newlands Farm</u></p>	<p>The site represents a remnant green space in what is now a largely urban area. Access by the public is not permitted as the site is primarily private cultivated land, either heavily grazed or used for growing crops dependent on the use of fertilisers and other chemicals.</p> <p>There is an entrance track to Katharine Tynan House, but no other footpaths. In addition, the site is bounded to the west by the busy R113 to Tallaght, by Newlands Golf Course and the large Roadstone Quarry, and is severed from residential areas to the north and east by the N7 Naas Road and M50. There is also some disturbance in terms of anti-social activity including dumping and arson.</p> <p>The site mainly comprises of arable fields and improved grasslands (mostly scrub) with mature hedgerows comprised of mixed species and treelines as field boundaries. There are several drainage ditches and an eroding stream along the</p>
---	---

	<p>field boundaries, all of which are feeding in to Coolfan Stream which connects to the Camac River further downstream.</p> <p>An ecological survey by JBA identified the key habitats of highest value within the site as being the mature woodlands, the field boundaries, that include trees and hedgerows, and the water courses and their riparian areas.</p> <p>The assessment did not find evidence of any unique wildlife or other habitats.</p> <p>Further to this a tree survey was carried out which identified those specimens that should be maintained and managed on the site. Many of the trees identified are growing near to Katherine Tynan House and along the Ballymount Road boundary and can be encapsulated within any future development proposal for the lands.</p>
<p>Plans for Newlands Farm “Telling the story” and “Leading the way” to achieve Biodiversity Net Gain</p>	<p>Hibernia REIT propose to develop a new community at Newlands Farm which will include extensive open spaces and a managed green belt between Kingswood and the rest of the development. This area of open space will connect with the existing Ballymount Park as part of a longer green belt running from the M50 through to the Belgard Road – almost 1.5km in length. The Masterplan envisages over 60 acres of open space which equates to 40% of the entire site.</p> <p>In line with the <i>National Biodiversity Action Plan 2021- 2025</i> and the <i>South Dublin County Council Biodiversity Action Plan 2020-2026</i>, the National Planning Framework (NPF) and the East Region Spatial and Economic Strategy (RSES), Hibernia are committed to retaining as much of the key habitats and trees identified as possible and supplementing with extensive planting and provision of additional wetland areas to secure connectivity in the landscape and allow wildlife to safely commute in an urban environment. There is the opportunity to enhance much of the existing habitat, some of which has become invaded by alien plant species or is excessively shaded by overgrown vegetation. Our Client will commit to managing the open green spaces in a manner that will promote biodiversity including a prohibition on the use of herbicides and pesticides.</p> <p>Wetland areas and their riparian zones will be planted with appropriate species that act as carbon sinks and promote greater levels of biodiversity. These zones will be protected from erosion through careful access walkways and other protection measures.</p> <p>As per the National Pollinator Plan, and to encourage greater biodiversity across the site, only native species of trees, hedgerows and wildflowers will be planted. Further to this, the site will be securely monitored on a continual basis reducing the likelihood of littering, illegal dumping and other anti-social behaviour that may result in damage to biodiversity.</p>

Key Point: Despite the current agricultural use of the subject lands, the lands hold some ecological value as set out above. Any development by our Client at the subject lands will work to retain and enhance the biodiversity value where possible, ensuring existing habitats are documented, understood, enhanced and expanded.

The development can be an exemplar for sustainable living and biodiversity 'net gain'. The site will contain 26% of green space and a 4km perimeter "biodiversity trail" that allows people to experience nature on the site. Carbon sequestration plays an important part in climate resilience and through the planting of additional trees, open grassland areas and enhancement of wetland areas, Newlands Farm will be a net carbon sink over its lifetime.

3.7

Infrastructure Assessment

3.7.1 Water Infrastructure

A Water Infrastructure Assessment Report has been prepared by OCSC Consulting Engineers which outlines how the proposed potential development site can be serviced by drainage and water networks, along with providing a Preliminary Flood Risk Assessment and an overview of suggested Sustainable Drainage Systems that should be implemented as part of the Masterplan development. This report, which been appended as Appendix A of this Submission states:

'The site is located withing Flood Zone C, for fluvial flooding, with CFRAM mapping for the modelled River Camac indicating flood extent remaining within the channel of the small watercourse that traverses the subject lands, with some minor flood extent downstream at the Ballymount Park pond. New development is to ensure no adverse risk of flooding is created on site, or downstream, as a result of new development, through design.'

Key Point: Any future development of the subject lands can ensure that flood risks downstream are not created as a result of any development at the subject lands.

The Water Infrastructure Assessment Report further confirms that

'A review of existing infrastructure indicates that there is significant existing public drainage and watermain infrastructure in the immediate vicinity of the site that can serve new development on the subject lands.'

'Preliminary master-planning for the subject lands indicate the ability to integrate a comprehensive arrangement of Sustainable Drainage Systems that will greatly improve the quality and reduce the volume of rainfall runoff discharging from site, while enhancing the biodiversity of the overall development.'

Key Point: The OCSC Report details the ability of the lands to implement SuDS features and boost biodiversity in the area. New development can easily maintain the existing natural hydrology and behaviour of the rainfall runoff by implementing an integrated sustainable drainage system that will promote natural infiltration and continue the flow of attenuated runoff towards the pond at Ballymount Park via the existing watercourses / ditches.

3.7.2 Traffic Assessment

A Preliminary Traffic Assessment, prepared by OCSC Consulting Engineers, is enclosed as Appendix B to this Submission. The Traffic Assessment examines Local Census data in the area which uncovers that '*95% of households in the area own at least one car*'. These are the exact patterns that the *Draft South Dublin County Development Plan 2022 – 2028* needs to strive to change and rezoning the subject lands to objective 'RESN' and objective 'REGEN' will allow for the provision of a greenbelt (c 1.5km in length) across the lands in a westerly direction in addition to a biodiversity parkland trail in a north south direction, reducing active travel distances to the Luas Red Cow and increasing permeability in the area.

3.7.3 Utility Assessment

A Utility Assessment Report, prepared by OCSC Consulting Engineers, is enclosed as Appendix C to this Submission. The report has demonstrated that the subject site is extensively serviced by existing utility infrastructure services such as ESB, Natural Gas, and Telecom Services.

4.0 PLANNING STATUS OF LANDS IN THE CURRENT DEVELOPMENT PLAN AND DRAFT DEVELOPMENT PLAN – UNCHANGED

4.1 Current Zoning of the Lands in the *South Dublin County Development Plan 2016-2022*

The subject lands are currently part zoned Objective 'RU' – Rural and Agriculture, and part zoned Objective 'EE' – Enterprise and Employment, as part of the *South Dublin County Development Plan 2016-2022*. An extract from the current Development Plan is included below for reference:

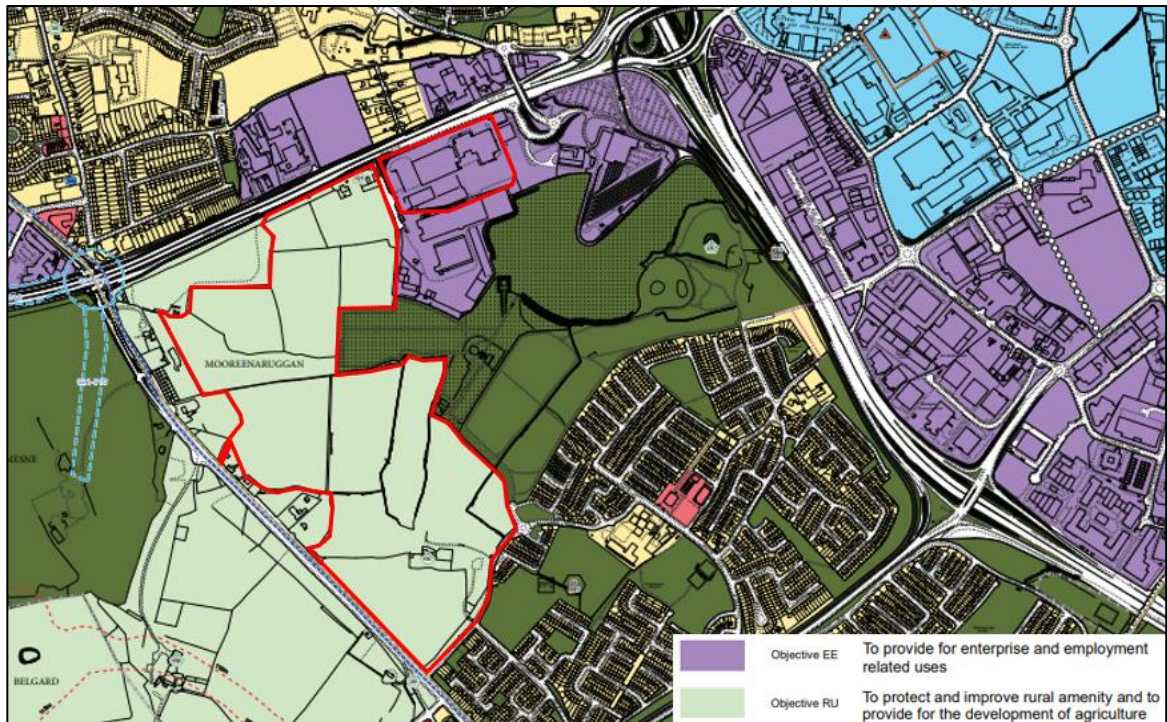


Figure 4.1: Current Zoning of the Subject Lands (Outlined in Red), as indicated in the *South Dublin County Development Plan 2016-2022*

Source: *South Dublin County Development Plan 2016-2022*, annotated by Thornton O'Connor Town Planning, 2021

4.2 Proposed Zoning of the Lands in the *South Dublin County Development Plan 2022-2028* – No Change

There is no change proposed to the planning status of subject lands as part of the *Draft South Dublin County Development Plan 2022-2028*. The subject lands are proposed to remain part zoned Objective 'RU' and part zoned Objective 'EE'. Thus, the current use of the majority of the subject lands as farming land that is inaccessible to the public is envisioned by the Council to continue.

An extract from the *Draft South Dublin County Development Plan 2022-2028* is provided below for reference:

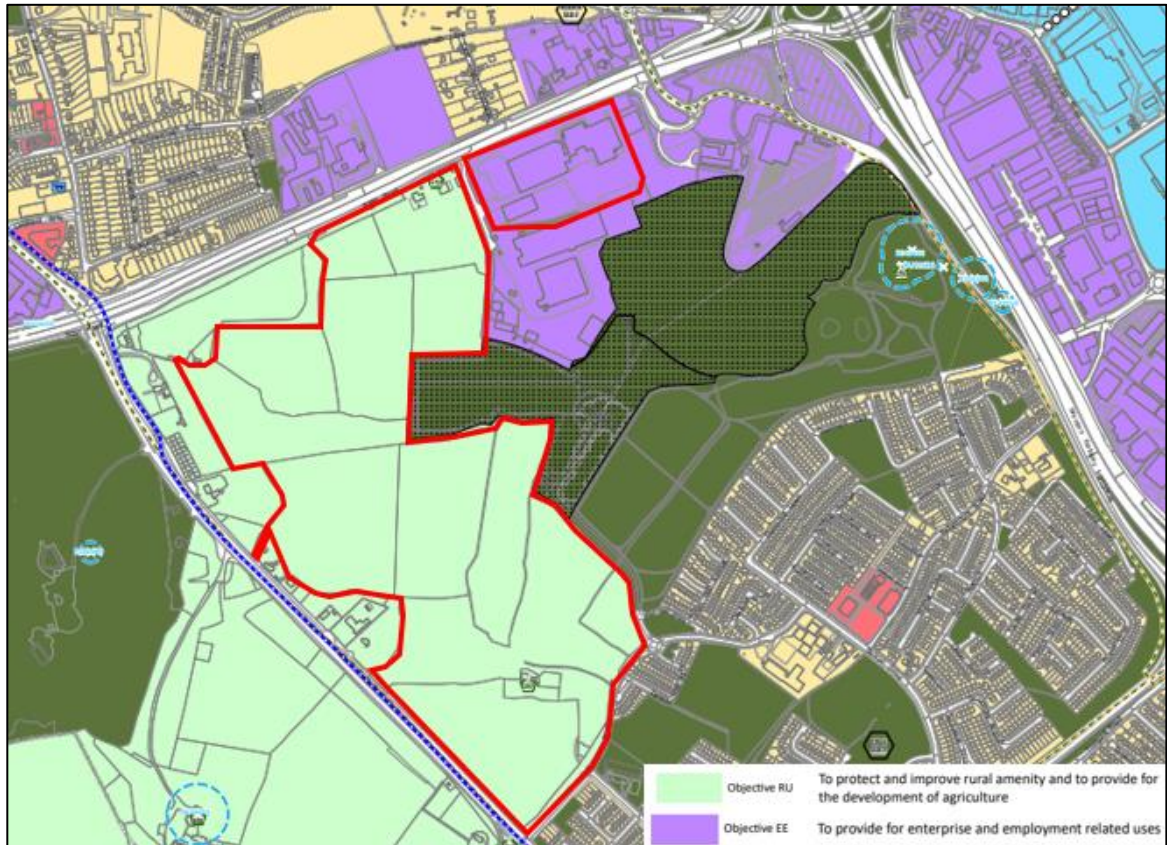


Figure 4.2: Proposed Zoning of the Subject Lands (Outlined in Red), as indicated in the *Draft South Dublin County Development Plan 2022-2028*

Source: *Draft South Dublin County Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2021

Key Point: The 'no changed' zoning status of the lands has been perplexing for our Client and the design team having regard to the location of the lands immediately proximate to two Luas stops at the city edge. Our Client would like to cordially extend an invite to any persons from South Dublin County Council to visit the subject lands for a site visit to understand the dichotomy presented by the subject lands – a fragmented farm in a highly accessible location surrounded by urban development. The objective to provide for rural amenity and agriculture is not succeeding at the subject lands - agricultural efforts are hampered by regular anti-social behaviour due to the location of the farm in an urban area and not subject to passive surveillance.

The *Development Plan Guidelines for Planning Authorities, June 2007* state in Paragraph 4.19 that 'in order to **maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach** should be taken to the zoning of land for development' [Our Emphasis]. We strongly submit that the zoning of the land for development would be both 'logical' and 'sequential' in accordance with the recommendations of the Guidelines.

The *Development Plan Guidelines for Planning Authorities, June 2007* define the principles of the sequential approach as below:

*'(i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);
(ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and
(iii) Areas to be zoned should be contiguous to existing zoned development lands'*

The Guidelines further recommend that:

'Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.'

It is unclear to our Client and their retained specialist design team why the subject lands have not yet been zoned for development. Specifically, why are they envisaged to be 'leapfrogged' by development and remain as farming land for the next six years? The Guidelines clearly set out that the principles of sequential development should only be contravened in exceptional circumstances – we respectfully query what is the justification for the subject lands not being rezoned for development? Why is farming land that is not accessible to the public considered a more appropriate use than housing when one has regard to the highly accessible location of the subject lands?

4.3 Why is Fragmented Farming Land Considered Appropriate at the City Edge? Why is the Sequential Approach to Zoning Not Applied?

We respectfully question the rationale for the fact that the subject lands have been 'leapfrogged' in the Draft Plan. It may well be that the current uses of the lands were not clear to the Planning Authority and the Councillors. There have been comments made that the 'greenbelt' at the subject site and its associated biodiversity value needs to be retained. The subject lands are not a greenbelt. The majority of the lands are zoned for rural development and in use for farming by two separate farmers. One of the farmers has a more major landholding at Baldonnell and the other farmer is principally based in Saggart at his larger landholding. Thus, the agricultural use of the subject lands by the two farmers is in the role of caretaker due to the nature of the fragmented landholding in an urban area.

The confusion regarding the matter of the greenbelt may be due to our Client having reassured local communities that they would be happy to extend the existing greenbelt of Ballymount Park across the subject lands in a westerly direction as part of any future development of the lands. Our Client's intentions to provide a greenbelt across the subject lands is similar to a previous vision for an extension of green infrastructure in the local area. As part of the *Naas Road Development Framework Study* published in 2010, a green bridge was proposed to facilitate a connection across the M50 to connect Ballymount Industrial Estate with Ballymount Park. An extract from the *Naas Development Framework Study Plan* is included below for reference:



Figure 4.3: East West Green Corridor Connecting Ballymount Park to the East over the M50 by a Green Bridge and West towards Newlands Golf Club

Source: The *Naas Road Development Framework Study, 2010*, annotated by Thornton O'Connor Town Planning, 2021

Our Client has proposed an east to west greenbelt across the subject land as part of any future redevelopment proposal and we submit that such an extension of the green infrastructure would provide a significant community gain and would also function as a buffer between any new development and existing communities at Kingswood.

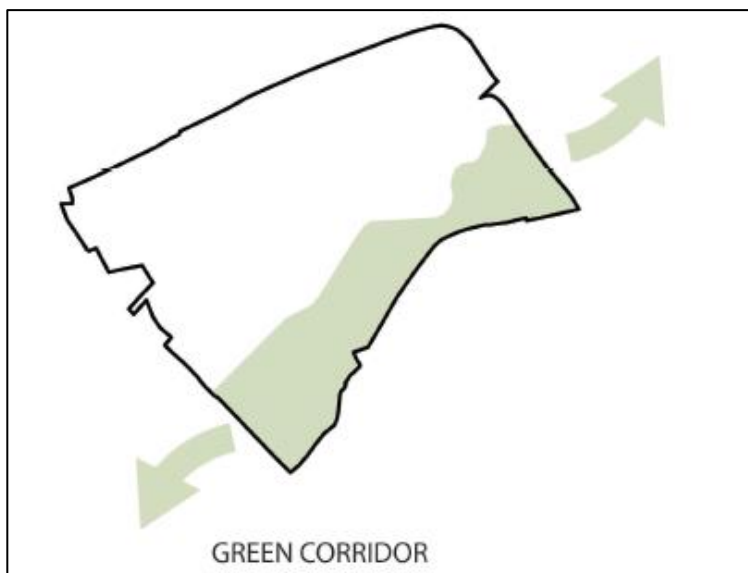


Figure 4.4: Concept Drawing Showing Vision to Extend the Greenbelt in a Westerly Direction

Source: Urban Agency

Key Point: The key question that thus needs to be considered is whether a fragmented farm at the subject lands for the next six years managed by 2 No. caretaker farmers represents proper planning and sustainable development of this highly accessible core urban location? Would it be more appropriate to zone the lands for a greater intensity of development having regard to its highly sustainable location, its infill site characteristics and its location contiguous to both lands in use for enterprise and employment use and residential use?

In our professional town planning opinion, ignoring the sequential approach to residential development at the subject lands is an oversight, especially given the suitability of the lands in relation to transit oriented development (TOD) and its position contiguous to enterprise and employment and residential lands. Newlands Farm can be an exemplar of TOD in Ireland. It is uniquely situated close to high quality public transport modes (LUAS, Bus Connects, regional/airport bus routes stopping along M7 and Red Cow LUAS Park and Ride and cycle corridors) and is within a short distance of Dublin City Centre (8kms from St. Stephens Green), where further public transport modes are present, making it an attractive location for those wishing to reduce their impact on the environment and reduce the carbon footprint and reliance on the car as their primary transport option each day.

The development vision for the site will incorporate extensive cycling routes, allowing those travelling to and from Newlands Farm, as well as those commuting through the development to their destination, a safer and more sustainable commute. All dwellings will be provided with ample bike parking storage removing the need for future residents to have access to a private car however, for those still wishing to rely on car transport, all parking areas will be provided with electric car charging locations, as is now the requirement under the *EU (Energy Performance of Buildings) Regulations 2021*, signed into law in August 2021.

It is difficult to comprehend why the sequential approach to planning has not been applied to this site and as aforementioned it may have been linked to a misunderstanding about its current use. We respectfully highlight that National, Regional and Local Policy all reinforce that the sprawl of our cities must be halted, and this should be managed through sequential development and the provision of higher density development on sites such as the subject lands which benefit from ease of access to high capacity public transport.

The National Planning Framework, published in February 2018, acknowledges the mistakes made in the creation of car dependent communities in the past and sets out the need for more suitably located development in proximity to existing infrastructure where possible:

Section 1.2 of the National Planning Framework

*'A major new policy emphasis on **renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns** out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing builtup areas of cities, towns and villages on infill and/or brownfield sites.'* [Our Emphasis]

The Regional Spatial and Economic Strategy (RSES), published in June 2019, calls for a sequential approach to development:

RSES Policy Objective 5.5:

*'Future residential development in the Dublin Metropolitan Area shall **follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs**, supported by the development of Key Metropolitan Towns in a sequential*

manner as set out in the Metropolitan Area Strategic Plan ('MASP') and in line with the overall Settlement Strategy for the draft RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.' [Our Emphasis]

Locally, the *Draft South Dublin County Council Development Plan 2022-2028* outlines the importance of a compact urban form and the potential of introducing a range of uses into an area to add a sense of vibrancy, allowing each use to benefit from existing infrastructure in the locality:

EDE1 Objective 3:

*'To ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to **promote compact growth by strengthening the integration between employment, housing and transportation.**;*' [Our Emphasis]

Policy QDP5:

*'Promote short distance neighbourhoods and strive towards the **achievement of 10-minute settlements** over the lifetime of the Plan, **promoting a more compact development form**, sustainable movement, and ease of access to services, community facilities, jobs and amenities.'* [Our Emphasis]

SM1 Objective 4:

'To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES/MASP.'

Our Client's vision for the subject lands provides for a mixed-use sustainable development quarter that incorporates housing, offices, community and recreational uses allowing for a '10 minute settlement' that will benefit from the excellent existing and proposed public transport infrastructure in the area. This will see a compact urban form introduced to the area where an increase in car dependency that might be expected for a development of this scale is not facilitated given the proximity to high capacity public transport infrastructure and the availability of local services.

The rezoning of the lands as Objective 'RESN' and Objective 'REGEN' would also allow for the introduction of varied heights into the predominantly 2 No. storey semi-detached residential dwellings with a focus on greater heights closer to the N7 frontage to create visual diversity on this key arterial route.

With respect to public open space, as aforementioned, the redevelopment vision for the subject lands includes the delivery of a proposed east to west green link across the subject lands, increasing permeability and resident amenity in the locality. This would also see the increase in the provision of green infrastructure as supported by the *South Dublin County Council Development Plan 2016-2022*.

Throughout the *Draft South Dublin County Council Development Plan 2022-2028*, an acknowledgement is placed on the importance of green infrastructure and the need to retain

ecological links. The following green infrastructure objectives are of relevance to the subject lands:

G2 Objective 1:

'To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.'

G2 Objective 3:

'To restrict development that would fragment or prejudice the Green Infrastructure network.'

G2 Objective 4:

'To repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network.'

G2 Objective 5:

'To integrate Green Infrastructure as an essential component of all new developments.'

Key Point: As already discussed, the subject lands are currently in intensive agricultural use which does not allow for the regeneration of flora and fauna. The envisioned redevelopment of the subject lands will create public open space and suitable lands for biodiversity regeneration which is not currently possible under the current land use (agriculture). Thus, the development vision for the subject lands will result in a net biodiversity gain and a significantly increased green corridor by extending Ballymount Park across the subject lands. The scheme will include 4 kms of biodiversity trail, wetlands areas and native planting.

To conclude, it is hard to gain an understanding for why the continued leapfrogging of the subject lands is taking place given its location in close proximity to high capacity public transport infrastructure. The subject lands represent an opportunity to implement many of the policies and objectives set out in National, Regional and Local Policy which aim to rectify mistakes made in the past in relation to urban sprawl and the creation of car dependent communities.

5.0 ELECTED MEMBERS CONSIDERATION OF MOTIONS PERTAINING TO THE SUBJECT LANDS

5.1 Overview of Motions Put Forward by Elected Members and Consideration of Motions

We note that two separate motions that specifically proposed not to rezone the subject lands were put forward by two Councillors. The first motion (Item ID: 71022) was brought by Councillor C. King. Councillor C. King's rationale for the lands not to be rezoned is outlined below:

'That the Plan protects and enhances where possible the Unique Lands known as Newlands Farm Located between the Belgard Rd, Ballymount Road and the Naas Rd N7 found on Map/Sheet 5. These lands are zoned RU and are a unique wildlife Habitat in an Urban setting between two major settings of Human Population of Clondalkin and Tallaght and are the lungs of Tallaght or the 'Stepping stones' for the purposes of Natural infrastructure mentioned in Chapter 3 NCBH 2 Objective 3 which states 'To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as 'stepping stones' for the purposes of green infrastructure and Article 10 of the Habitats Directive'. These Lands with their rich abundance of Flora and Fauna including large numbers of animals offset the enormous carbon Pollution created by the vehicular traffic on the Belgard Road but more specifically the N7 - The busiest Road in the Country and therefore must be protected. Section 2.2 Clearly states that we have more than enough Residential zoned lands within the County to meet our Ministerial targets of 17,817 and even the top tier target of 23,730 as we currently have enough zoned land to deliver 44,472 Housing units which could cover two development plans over 12 years under current population projections. In addition to the above 2.4.1 states 'The NPF's number one strategic objective: Compact Growth, sets a clear development outcome to grow our existing urban areas creating a priority to build on brownfield / infill development first, before considering greenfield lands.' This statement further supports the argument to protect the current zoning on the aforementioned Lands. Furthermore, 2.6.7 continues to support this zoning by stating 'As set out in Table 9, South Dublin has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth. Lastly, with all of the above in mind, this area of rich Biodiversity must be protected now in this Plan and into the future by ensuring its zoning is enshrined in the plan to ensure the important functions it serves to both the wildlife and the human population that surrounds it and also to ensure we create a plan that is strictly in line with current ministerial targets and National and Local targets, guidelines and Policy's some of which are set out above.

Furthermore, the second motion put forward to support retaining the current zoning of the subject lands was tabled by Councillor T. Costello (Item ID: 71173). The Councillors' rationale for the lands not to be rezoned is outlined below:

'Chapter 2 That this council does not rezone the green belt at Newlands Cross and it remains zoned agricultural.'

The two Councillors thus support the retaining of the current zoning and the motions were passed thus the zoning of the subject lands has remained unchanged.

Key Point: We fully appreciate the concerns of the Elected Members regarding the biodiversity of the lands. We all have a role to play in protecting the local environment and its habitats. However, the Councilors did not have the benefit of access to the site or the undertaking of specialist assessments of the subject lands when writing the motions and thus include comments that do not accurately reflect the ecological status of the subject lands.

As aforementioned the subject lands do not provide a greenbelt (as stated by Councillor Costelloe) but in fact largely provide agricultural lands that are farmed and inaccessible to the public. Hibernia REIT has retained JBA Consulting to do an ecological walk over of the site. JBA Consulting subsequent to their walkover on 7th and 11th August 2020 confirmed that:

'The proposed site mainly comprises arable fields and improved grasslands with mature hedgerows and treelines as field boundaries. There are several drainage ditches and an eroding stream along the field boundaries, all of which are feeding into Coolfan Stream which connects to Camac River further downstream. There are mature woodlands along the borders of the site; one in the north-west, one in the centre towards Newlands Cross Cemetery and two in the south. There are some areas with scrub, most prominently a field in the north-east with a mosaic of grassland and scrub.'

JBA confirmed that *'No sightings of protected species were recorded'* and *'In total five invasive non-native plant species were recorded during the ecological survey. None of these species are listed on the third schedule of the EC (Birds and Natural Habitats) Regulations 2011 S.I. No. 477/2011.'*

The subject lands lie directly to the west of Ballymount Park which provides an accessible 'green lung'. The subject site's development vision also proposes a significant extension to this east/west green corridor. Whilst the hedgerows and treelines are of acknowledged value, they can be retained in any future development of the subject lands and thus should not hamper any development of the subject lands. Importantly there were no sightings of protected species. Thus, it is clear that statements that the subject lands are rich in biodiversity are not grounded in fact and do not reflect the intensive farming use of the majority of the land which naturally degrades biodiversity value.

We respectfully submit that the Elected Members were not able to make an informed judgement as not all of the facts had been put forward at the time. It is important to our Client to ensure that the facts of the lands are understood in any decision making.

The next section outlines our Client's rationale to seek the rezoning of the subject lands as Objective 'RESN' and Objective 'REGEN' to allow for the delivery of a plan-led, mixed-use, sustainable development quarter that incorporates housing, offices, community and recreational uses.

5.1 Opportunity Presented by Draft Plan Consultation Stage to Clarify Previous Concerns Raised

The Draft Plan consultation stage affords our Client the opportunity to put forward their case for rezoning and to clarify some inaccuracies that existed in the consideration of Motions. It is imperative that an informed judgement is made in respect of the subject lands. The comments below will further address the points raised by Councillor C. King:

Green Infrastructure

Any development by our Client on the lands will retain and expand the landscaped boundary on the site and see the provision of open space in tandem with the delivery of development. Furthermore, the rezoning of the lands to allow for residential and commercial development will allow for the provision of a new east to west green link across the subject lands, opening up pedestrian permeability in the area which does not currently exist. The European Environment Agency's definition of Green Infrastructure (GI) cites the benefits of increased connectivity through landscapes:

*'GI provides the opportunity to increase connectivity through landscapes, for both humans and wildlife. This is increasingly important as landscapes are becoming progressively more fragmented. It is imperative that in moving forward with the approach of a better-connected environment, areas of green space and any connecting links are well protected, enabling the creation of a coherent and permeable GI network. Main areas of green space or 'cores' are the fundamental building blocks to GI networks, with corridors (e.g. cycleways, rivers, tree belts etc.) and 'stepping stones' (e.g. numerous small areas of green space, such as a sequence of parks or wildlife sites) providing link throughout the wider landscape.'*⁸ [Our Emphasis]

Key Point: Any proposal for development at the subject lands will see the removal of intensive agriculture to be replaced with significant tracts of open green space ideal for the restoration of habitats that may have been lost due to intensive agriculture on the lands.

The European Environment Agency defines Green Infrastructure as 'a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services' in both rural and urban settings.⁹

Any future development of the subject lands can include such designed and managed environmental features in order to restore the biodiversity value of the subject lands.

Zoned Land Not Translating into Completed Units

The Councillor raises concern regarding the need for any additional residential units. Whilst we agree that the Council must abide by a Core Strategy, we question why alternative sites have been zoned when the subject lands are sequentially more appropriate for development?

Furthermore, we note that unfortunately zoned land does not translate into completed units. Section 4.4.2 of the 'Draft Development Plans Guidelines for Planning Authorities' (August 2021) issues guidance for lands or sites that are proposed to be zoned:

Section 4.4.2

'Estimating requirements for land and sites to be zoned for residential or a mixture of residential and other uses must follow on from an assessment of whether the amount

⁸<https://landuse.co.uk/green-infrastructure/>

⁹eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure

*of land already zoned is adequate to meet the housing needs of the area. **The rate of take-up and build-out of such land over a preceding period of at least 6-10 years is an important consideration in this regard.*** [Our Emphasis]

Key Point: Based on a Land and Housing Capacity Report conducted by Hendrik Van der Kamp as part of this Submission (see separately attached as Appendix D), much of the Objective 'Res-N' zoned lands in South Dublin has been zoned 'Res-N' since 2004 and has continuously failed to deliver housing over the 18 year period from 2004-2022. Should this land continue to be zoned when it is eminently clear that it is highly unlikely to deliver much needed housing over the Plan period?

We will delve further into the issues of zoned lands not equating to delivery in Section 7.0 of this Submission.

Impact on Biodiversity

Councilor C. King expresses concerns around the impact on biodiversity due to the removal of:

'stepping stones for the purposes of green infrastructure.'

The Figure below depicts the numerous 'stepping stones' or areas of green open space in the vicinity of the subject lands and also highlights the benefits of an envisioned east to west green link across the subject lands, which will see the introduction of increased levels of permeability to the area and a reduction in walking and cycling distances.

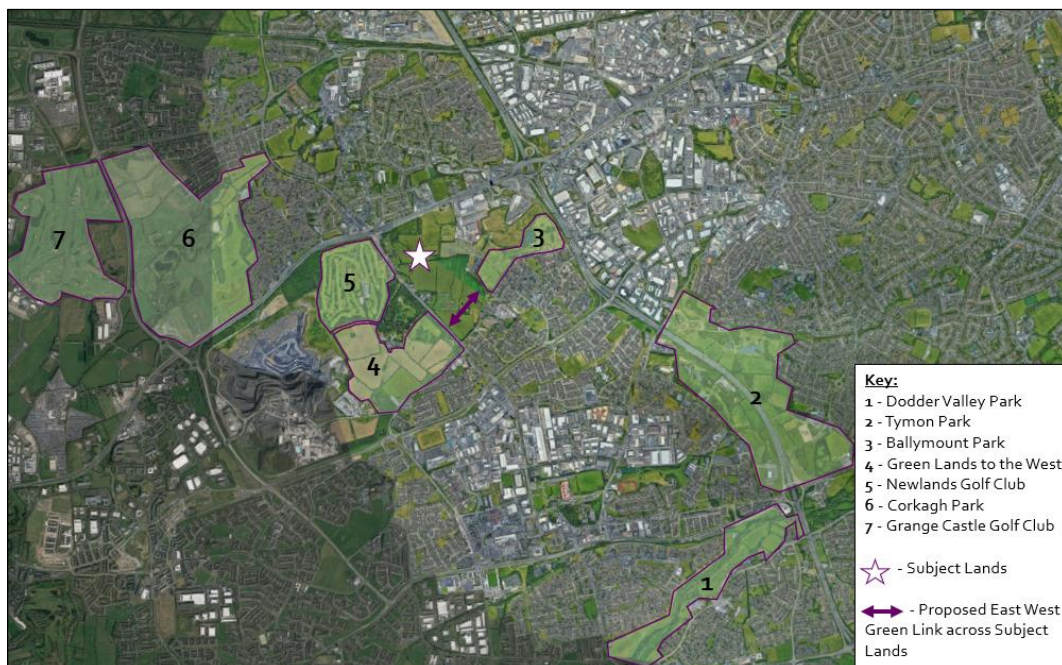


Figure 5.1: Map Showing an Abundance of 'Stepping Stones' in the Vicinity of the Subject Lands

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021

Key Point: We contend that there is sufficient green space in the locality that truly function as 'stepping stones' for wildlife as shown in the Figure above. Extensive planting and provision of additional wetland areas at the subject lands as part of a managed and designed future development will help to secure connectivity in the landscape and allow wildlife to commute in an urban environment.

Compact Growth

The Councillor refers to the need for compact growth to be delivered through brownfield or infill development. We submit that the subject lands are clearly 'infill' in nature their development would be fully in accordance with the delivery of compact urban forms.

Compact growth is regarded as best practice as it leads to reduced travel distances, allowing walking or cycling as well as public transport to serve a larger population of people in an area, thus reducing the reliance on the private car and creating sustainable communities.

Key Point: The subject lands represent arguably one of the most suitable landbanks in South Dublin Local Authority Area to accommodate sustainable growth and is unique in its ability to deliver a compact urban form in tandem with over 16 ha of public open space in a singular tract (in addition to pocket parks throughout the scheme), close proximity to high capacity public transport infrastructure and existing neighbourhood centres. North and South of the subject lands, sprawl has continued where public transport provision remains inferior when compared to the subject lands. To allow for the leapfrogging of the subject lands would represent a continuation of the mistakes of the past in the creation of car dependent communities.

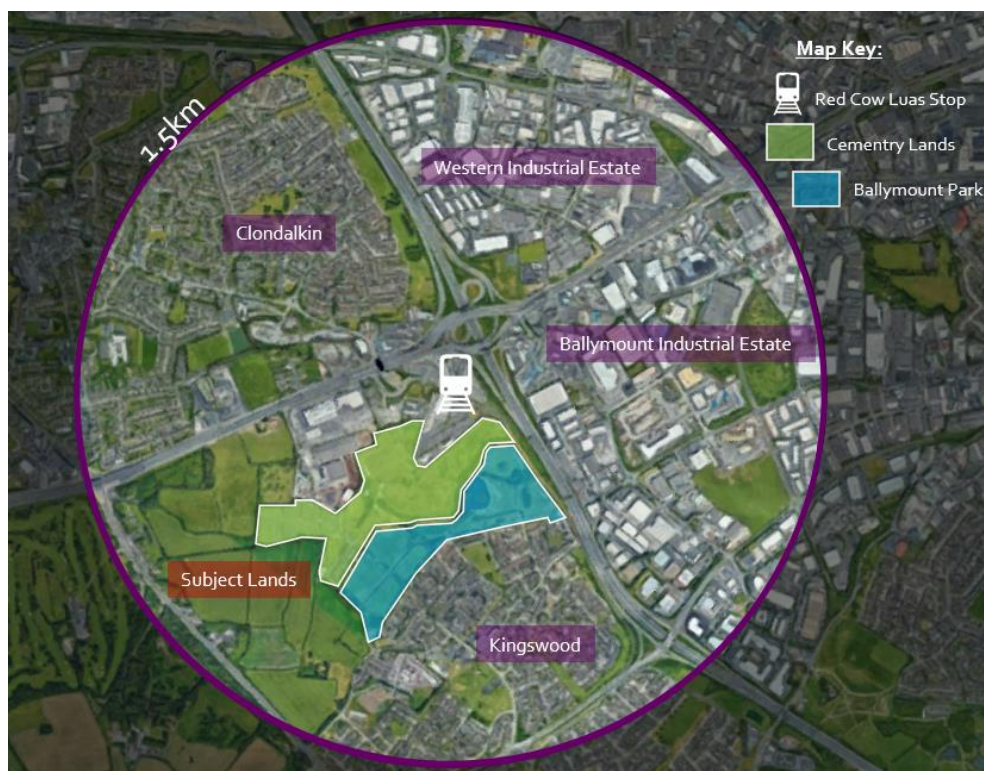


Figure 5.2: Map of a 1.5 Kilometre Radius from the Red Cow Luas Station Showing Urban Development in all Quadrants except the South West Quadrant

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021

6.0 DEMONSTRATING THE COGENT CASE TO REZONE THE SUBJECT LANDS TO PROVIDE A PLAN-LED SUSTAINABLE MIXED-USE DEVELOPMENT QUARTER THAT INCORPORATES HOUSING, OFFICES, COMMUNITY AND RECREATIONAL USES

6.1 Creating Liveable Communities - A Vision for a 'Best in Class' Sustainable Mixed-Use Development That Accords with the Vision for a 10 Minute City

The vision for the subject lands is for the delivery of a plan-led, mixed-use, sustainable development quarter that incorporates housing, offices, community and recreational uses on lands that are located adjacent to infrastructure and services and easily accessible to major public transport nodes. The development vision for the subject lands is repeated below for ease of reference:



Figure 6.1: Concept Drawing Demonstrating the Vision for the Subject Lands

Source: Urban Agency

The envisioned development will occupy and allow for a strong frontage along the Naas Road as the subject lands have the potential to accommodate iconic buildings that denote a gateway to the city from the N7. This will allow for increased urban legibility and implement wayfinding, functioning as the interface of the city (as an alternative to the 'Red Cow' hotel which is the landmark building on the eastern side of the M50).



Figure 6.2: Potential of Lands to Function as Interface of City

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021

We reiterate that the development of the subject lands with high quality architecturally designed buildings would create visual diversity along the N7 route.



Figure 6.3: Dublin based Example of High Quality Buildings Providing Urban Legibility – Heuston South Quarter Development

Source: Google Streetview

The subject lands are ideally located to deliver a Transport Oriented Development that also comprises a 10 minute settlement. We note the concerns of Councillor King regarding the

enormous carbon pollutions caused by traffic on the N7 which are shared by our Client and the design team. The subject development by its very nature is ideally placed to encourage sustainability and reduce dependence on transport by private car.

In 2017, the transport sector overtook energy as the second largest (19.8%) producer of greenhouse gas emissions in Ireland. In addition, road transport makes up 95% of overall transport emission figures¹⁰. Transport emissions have experienced continued growth and show no sign of easing unless our current unsustainable land use practice is halted to allow people to live comfortably without dependence on the private car, as can be achieved at the subject lands.

At a national level, the Irish Government has adopted the principles of the EU Green Deal and, in July 2021, signed into law the *Climate Action and Low Carbon (Amendment) Bill 2021*, which commits the nation to becoming a net zero carbon economy by 2050, lowering greenhouse gas emissions by 7% per year.

Key Point: On a macro scale, the planning system needs to ensure that planning decisions continually reinforce efforts to encourage more sustainable ways of living. On a micro scale, the subject lands in Newlands Farm can play a role in proving an exemplar scheme of living sustainably in a compact designed environment with ease of access to multiple modes of public transport and walking distance to shops and services. Newlands Farm can act as a 'catalyst' for more sustainable and climate resilient development in showing how South Dublin County Council and Hibernia REIT embraced the need for change and demonstrated how to provide a highly sustainable 'best in class' development quarter at a time when the country's population continues to rise and future generations continue to be at risk of being locked into car dependence with associated risks of climate change.

6.2 Creating Connected Neighbourhoods Whilst Respecting Existing Communities

In relation to protecting the existing residential amenity, the development vision includes a proposed greenbelt across the subject lands which physically separates the existing low density neighbourhoods of Kingswood from the subject development. This area of open space will connect with the existing Ballymount Park, as part of a longer greenbelt, running from the M50 through to the Belgard Road – almost 1.5km in length, all the while delivering additional public open space and increasing permeability in the area, a key component for the delivery of the 10-minute city urban planning concept.

The adjacent neighbourhood of Kingswood is currently adjacent to an inaccessible farm but will benefit from an adjacent accessible and walkable area and enjoy the recreational facilities and character of the historic buildings (Katherine Tynan House and Newlands Farm). Our Client is committed to the provision of over 16 ha of open active accessible and a managed green belt between Kingswood and the rest of the development.

The *Draft South Dublin Development Plan 2022-2028* recognises the potential benefits of connected or short distance neighbourhoods which promote a more sustainable and enjoyable way of living. It is the policy of the *Draft Plan* (Chapter 5) to:

¹⁰ <https://www.cso.ie/en/releasesandpublications/ep/p-eii/eii19/greenhousegasesandclimatechange/>

'Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.'

The 10-minute city is an urban planning concept where neighbourhoods and communities are structured around the availability of essential and convenient everyday activities, services and leisure opportunities which can be reached by foot or by bicycle within a comfortable walking or cycling distance. Such neighbourhoods are often focused on village and neighbourhood centres and are strengthened by the availability of high quality public transport or a range of employment opportunities.

This concept has been recognised as a recommendation of the *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (2019)*, that Planning Authorities support the provision of '10 Minute Settlements' as described below:

10 Minute Settlement – RSES for the East and Midlands Regional Assembly (2019)

'Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.'

'Support the '10 Minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.'

Key Point: The subject lands present an opportunity to introduce the 10-minute settlement concept of urban proximity to the area and allow a sense of community and place to develop as more space can be allocated to public open space and sustainable travel modes.

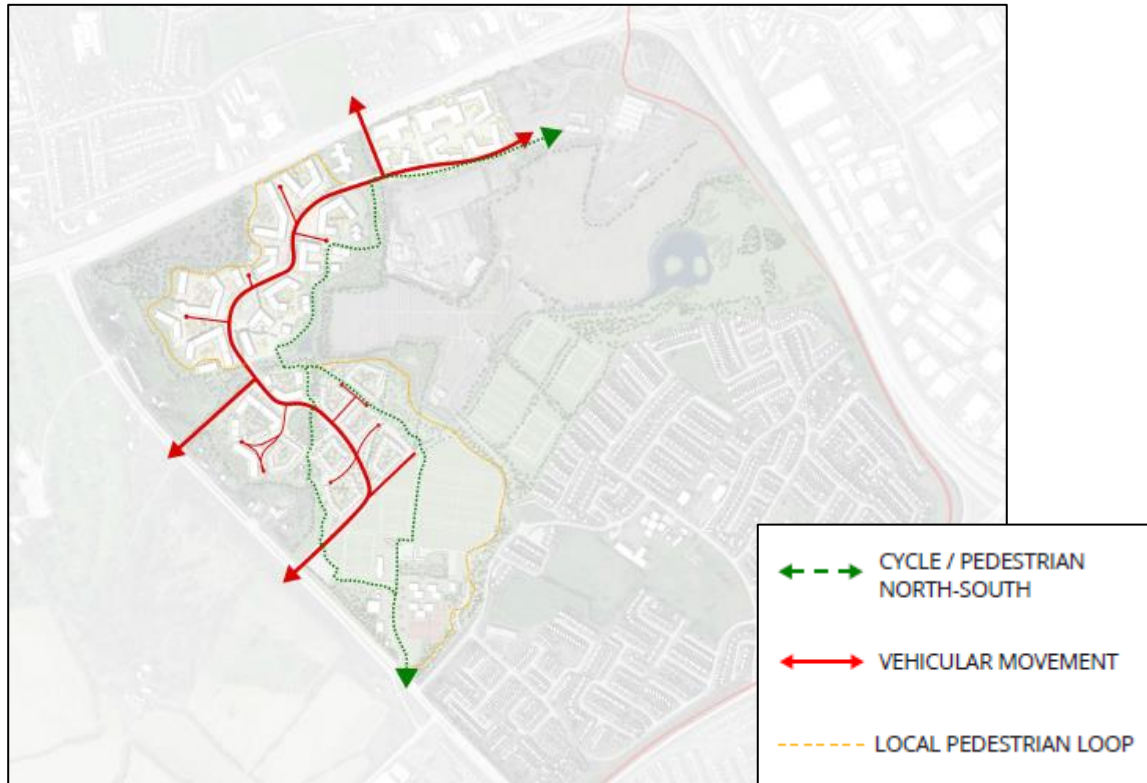


Figure 6.4: Map Showing Potential Pedestrian, Cycle and Vehicular Movements Across the Lands

Source: Urban Agency, 2021

6.3 Providing Substantive Open Space and Recreational Opportunities including a Greenbelt Through the Subject Lands

The proposed Greenbelt (c. 1.5km in length) will form a substantive portion of the proposed development at the subject lands and will not represent the sole provision of public open space at the subject lands. Pocket Park spaces will be provided throughout the rest of the development serving to ensure ample accessible public open space is introduced into the area for the benefit of existing and future residents alike. In addition to the 16 ha to be dedicated to the westerly extension of the Ballymount Park, in excess of 8 ha of green open space will be integrated into the residential areas of the site, bringing the total open and green space to over 24 ha which equates to 40% of the entire site.

6.4 Enhancing Existing Site Character Value Including Making Historic Buildings Accessible and Protecting and Enhancing Biodiversity

The 2 No. Protected Structures on site can provide focal points and points of interest within new and existing communities. Providing access to the Protected Structures will allow them to become legible and appreciated by the general public and reuse of such Structures ensures their maintenance and longevity for the enjoyment of future generations. The following objective of the Development Plan provides for the creative re-use and rehabilitation of Protected Structures:

HCL3 Objective No. 3:

'To address dereliction and encourage the rehabilitation, renovation, appropriate use and reuse of Protected Structures.'

Key Point: The development of the subject lands would transform disused Protected Structures currently the location of persistent anti-social activity into active community facilities that allow the historic fabric to be appreciated.



Figure 6.5: Map Showing Proposed Greenbelt Which Surrounds the Existing Protected Structure at Katherine Tynan House

Source: Urban Agency, 2021

6.5 Current Opportunities for New Housing in the Area - the Need for Tenure Choice and Opportunities for Families to Remain in Their Existing Communities

There is a growing need for a choice of tenure in the Clondalkin and Kingswood area, which are predominated by housing as a dwelling type. As demand for housing continues to rise, supply is struggling to keep pace resulting in a shortage of suitable housing units. An increased choice of tenure will also cater for those who wish to reduce or increase the size of their residential dwelling accordingly to better suit their needs, thus freeing up larger or smaller residential units for those who are in search of such units.

Key Point: An increase in tenure choice and supply of high quality residential units will be of considerable benefit to the area at a time of critical housing demand.

A search of properties for sale in the Kingswood and Clondalkin area on 5th August 2021 has demonstrated that there are just 12 No. properties for sale which range in price in from €235,000 to €450,000 and relate to apartment and semi-detached housing.

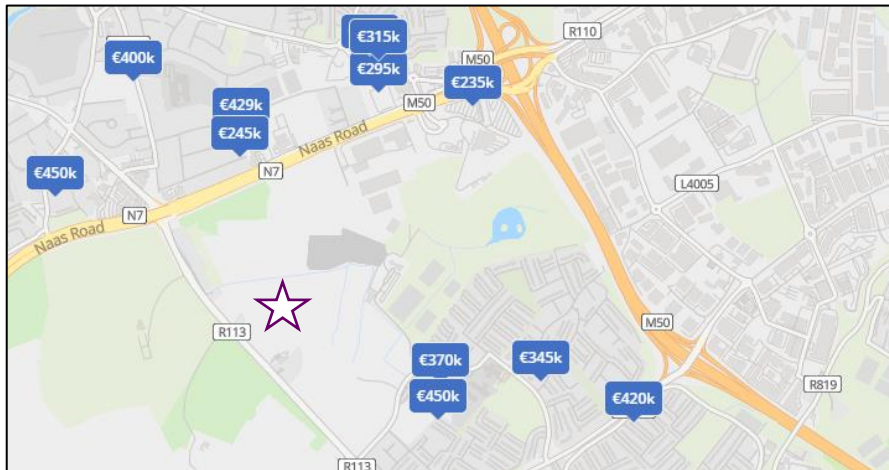


Figure 6.6: Map Showing 12 No. Properties for Sale in the Kingswood and Clondalkin Area on 05.08.21 with Subject Lands (Identified by a Star)

Source: www.Daft.ie

At present, 4 No. of the 12 No. properties for sale in the Clondalkin and Kingswood area are located in Kingswood with the limited quantum of supply that presently plagues the Dublin property market, evident in the area.

A search of properties for rent in the same area had a smaller number of options and the rental prices ranged from a minimum of €680 to a maximum of €2,000. For clarity, the reference to €170 on the map below is a weekly rental price for a unit at Monastery Road, Clondalkin, Dublin 22.

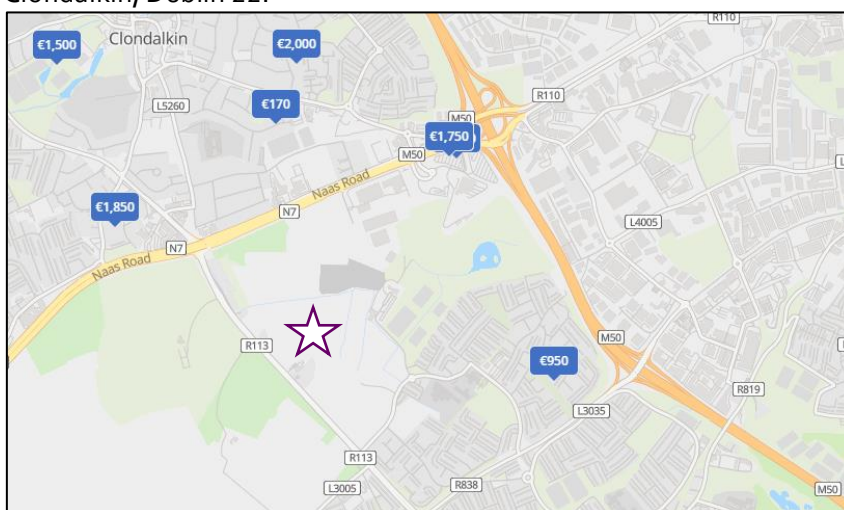


Figure 6.7: Map Showing 10 No. Properties for Rent in the Kingswood and Clondalkin Area on 05.08.21 with Subject Lands (Identified by a Star)

Source: www.Daft.ie

Key Point: The rezoning of the subject lands to Objective 'RESN' and Objective 'REGEN' will allow for the introduction of increased tenure choice and supply of residential units. Any future development at the subject lands (pending their rezoning) will deliver a range of unit sizes meaning those that wish to downsize or upsize are able to do so without having to move out of the area, continuing to maintain the sense of community and social connections for which the area is well regarded.

6.6 Review of the Subject Lands Having Regard to Development Plan Objectives

As part of this Submission, a review of the objectives of the Draft Plan has been undertaken by Hibernia REIT to assess the potential of the subject lands to assist or negate the achievement of set objectives. The review is attached as Appendix E, and we note that it is eminently clear that the redevelopment vision for Newlands Farm fully aligns with and achieves a significant number of Draft Development Plan objectives. Specifically, the review concludes that the rezoning and subsequent redevelopment of Newlands Farm would accord with 128 No. objectives of the Draft Plan.

6.7 Comparative Review of the Subject Lands in the Context of Other Substantive New Residential Zoned Lands in the Functional Area of the Planning Authority

We note that large scale landbanks continue to be zoned for residential use in South Dublin County Council at locations not served by high capacity public transport infrastructure and we question why such lands are zoned in lieu of the subject lands?

To clearly convey this point, we have undertaken an analysis of landbanks zoned for residential use in the South Dublin County Council functional area to determine if the subject lands are being leapfrogged for more suitably located lands. To determine if the lands are more suited for residential development, we have assessed each landbank under the following criteria:

- Proximity to high capacity public transport (10 No. minute frequency);
- Proximity to Neighbourhood Centre;
- Proximity to Schools.

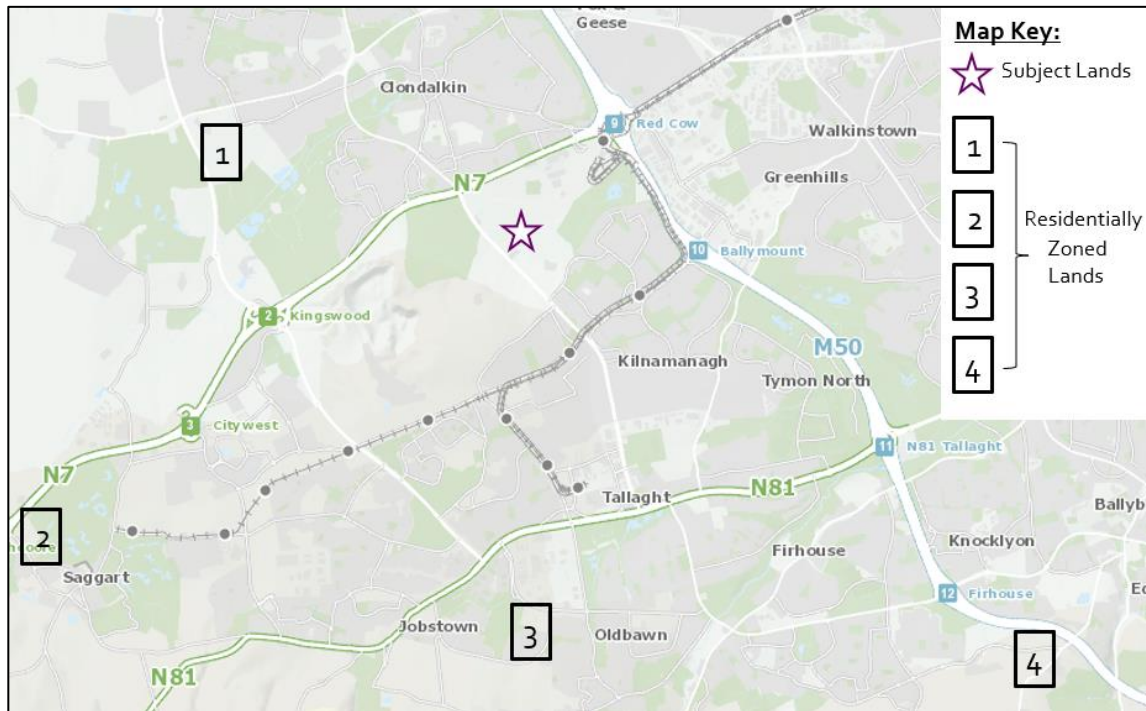


Figure 6.8: Subject Lands and Surrounding Zoning Context

Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021

	Subject Lands	Site No.1	Site No.2	Site No.3	Site No.4
Distance from nearest Neighbourhood Centre	1 km (c.13 No. min walk)	2.3 km (c.29 No. min walk)	850 metres (c.11 No. min walk)	2.1 km (c.25 No. min walk)	1.8 km (c.21 No. min walk)
Distance from Nearest Luas or High Capacity (10 No. Min. Frequency) Public Transport	350 metres (c.4 No. min walk)	3.3 km (c.42 No. min walk)	1.6 km (c.20 No. min walk)	1.8 km (c.22 No. min walk)	2.5 km (c.31 No. min walk)
Distance from nearest Primary School	850 metres (c.11 No. min walk)	1.2 km (c.15 No. min walk)	1 km (c.13 No. min walk)	600 metres (c.7 No. min walk)	2.6 km (c.31 No. min walk)
Distance from nearest Secondary School	750 metres (c.9 No. min walk)	1.9 km (c.23 No. min walk)	1.6 km (c.21 No. min walk)	450 metres (c.5 No. min walk)	1.9 km (c.22 No. min walk)

Key Point: We submit that it is eminently clear from reviewing the table above, that the subject lands are much more suitable for residential development than the other 3 No. sites included in the example (that are zoned for such development). Newlands Farm is the only site that is located within 1.5 km of high capacity public transport and thus has the greatest opportunity to create sustainable development.

In relation to the subject lands, the nearest neighbourhood centre is situated 15 No. minutes from the subject lands (Kingswood Shopping Centre) however, it is important to note the proposed development is envisaged to include retail and non retail services. The subject lands appear highly suited for residential development when compared against existing residentially zoned lands in terms of walking distance. The subject lands provide access to a range of local services and amenities, with a maximum walking distance of 13 No. minutes, rendering the subject lands suitable for the creation of a compact and connected residential development in line with national, regional and local policy.

7.0 INTERPRETING THE CORE STRATEGY AND HOUSING NEED ASSESSMENT – ARE SUFFICIENT LANDS ZONED?

7.1 Introduction

This Section of the Submission to the *Draft South Dublin Development Plan 2022-2028* has been prepared by Hendrik Van der Kamp and considers the following key question- whether the core strategy in the Development Plan has made sufficient provision for residential development during the lifetime of the Development Plan?

Such provision is in the form of zoned lands, in particular the lands earmarked for new residential development and lands with the zoning objective 'RES-N': To provide for new residential communities in accordance with approved area plans.

The analysis that is presented addresses four questions, all of which are related to the overall quantum of land needed for residential development during the lifetime of the Development Plan:

- Question One: Will All of the Zoned Lands be Developed?
- Question Two: Is Headroom Provision Sufficient?
- Question Three: Are the Population Projections Correct?
- Question Four: Is the Household Size Figure Realistic?

7.2 Question One: Will All of the Zoned Lands Be Developed?

In relation to the core strategy, the recently published Draft Guidelines on Development Plan preparation state the importance for Development Plans to:

*'...Provide detailed analysis of existing and proposed land use zonings, with a particular focus on residential development.'*¹¹

It is an established reality that the zoning of land in a Development Plan or Local Area Plan does not guarantee that development will take place. As a result of a number of factors, not all lands zoned for the six year period of the Development Plan may be developed or are even likely to be developed. For that reason, Planning Authorities generally assume a degree of 'overzoning' in order to provide sufficient flexibility during the lifetime of the Development Plan.

Analysis of the zoned lands in the *Draft South Dublin Development Plan 2022-2028* shows that a large proportion of the lands that have been zoned for new residential development, were also zoned in previous Development Plans but were not developed. The Draft Development Plan does not indicate the reasons for this and does not provide any informed analysis as to why the lands are likely to be developed during the forthcoming six years when they were not developed up to now, during a period of up to 20 years or more.

¹¹ *Development Plan Guidelines for Planning Authorities*, August 2021, p. 51.

Key Point: The core strategy of the Draft Development Plan notes that there is 477 ha of zoned land excluding SDZs and long term strategic lands with the potential to accommodate 23,731 No. dwelling units.¹² However, an analysis of the larger portions of RES-N zoned lands reveals that many of these were zoned in previous Development Plans going back as far as 2004 (see Table 1). From this analysis, it would appear that at least half of the zoned lands have been zoned for periods of 18 years or longer but still remain undeveloped.

Location	Area in hectares	Zoning Objective	Zoned Since	Current Status
Rathcoole	14.6	RES-N	2004	Undeveloped
Citywest	30.5	RES-N	2004	Undeveloped
Killinarden	22.4	RES-N	2004	Undeveloped
Ballycullen	90.0	RES-N	2004	Partially Developed
Newcastle	41.0	RES-N	2004	Undeveloped
Ballyboden/ Edmondstown	43.3	Existing Residential	2004	Undeveloped
Total	241.8			

Table 7.1: Zoned Legacy Lands. (See for more detailed information see Legacy Lands Analysis attached as Appendix D.)

Source: As compiled by Hendrik Van der Kamp

The recently published Draft Development Plan Guidelines suggest that the following approach should be adopted in the situation where zoned lands have not been developed through several development plan cycles:

'...in cases where land is zoned and has remained undeveloped and unserved through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective (See Appendix A).'¹³

Key Point: The answer to the question: 'Will all of the zoned lands be developed?' must clearly be negative. If a large proportion of the lands zoned in the 2004 Development Plan were not developed in the lifetime of that Plan, nor during the lifetime of the two subsequent Plans, it is likely that at least some of these lands will remain undeveloped even if their zoning is confirmed in the adopted Plan.

7.3 Question Two: Is Headroom Provision Sufficient?

Paragraph 4.14 of the *Development Plan Guidelines for Planning Authorities, June 2007* states that Planning Authorities should generally make provision for 50% more zoned land than is required to meet demand during the six-year lifetime of a Development Plan i.e. sufficient

¹² *South Dublin Draft County Development Plan 2022-2028*, p. 15.

¹³ *Development Plan Guidelines for Planning Authorities*, August 2021, p. 54.

land for a further three years,¹⁴ known as 'headroom'. However, this guidance was superseded by the Implementation Roadmap which reduced the headroom percentage from 50% to 25% as it states the following:

*'...Scope for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow.'*¹⁵

With the recent publication of the *Draft Development Plan Guidelines*, this paragraph of the Implementation Roadmap appears to be superseded by the Draft Development Plan Guidelines which do not use the term 'headroom' and instead refer to 'additional provision'. The Guidelines state the following:

*'...There is no automatic presumption of Additional Provision land or sites to meet housing supply targets in any development plan. The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period.'*¹⁶

It would appear therefore that Planning Authorities are no longer advised to provide an additional three years' supply of zoned land beyond the six year lifetime of the Development Plan (50%) but instead adopt a targeted approach for each settlement with a maximum of 25% of the actual amount of zoned land that is required.

While the Guidelines are still in Draft form, it would appear that this provision will reduce flexibility in the provision of zoned land to an extent that there is a risk of a shortfall of development during the lifetime of the Development Plan. The reasons for this are twofold: (i) the fact that not all zoned land will be developed (as is clearly the case in South Dublin as shown in the previous paragraph) and (ii) the fact that Development Plans often 'overrun' their plan period which means that the six years may have lapsed before a new plan is operational.

Key Point: Notwithstanding restrictive national guidelines in relation to 'headroom provision' the answer to the question: 'Is headroom provision sufficient?' is negative which may result in a shortfall of available zoned land during the lifetime of the Development Plan.

7.4 Question Three: Are the Population Projections Correct?

Under the National Planning Framework that was adopted in February 2018 it states a maximum of 50% of population growth during the plan period up to the year 2040, should be accommodated in the Eastern and Midland Region.¹⁷

¹⁴ paragraph 4.14 of the 2007 Development Plan Guidelines for Planning Authorities.

¹⁵ *Implementation Roadmap for the National Planning Framework*, Govt. of Ireland, July 2018, p. 5.

¹⁶ *Development Plan Guidelines for Planning Authorities*, August 2021, p. 55.

¹⁷ *Project Ireland 2040 - National Planning Framework*, Government of Ireland 2018, NPO 1a.

The Implementation Roadmap that was published later in the year (July 2018) confirmed the national average baseline projection for the period to 2040 as 1.1 million people over 2016 Census figures. Appendix 2 of that document includes population projections up to 2031 for the regions and counties. These projections, known as transitional projections, confirm the NPF objective that the proportion of the national population growth that would be accommodated in the Eastern and Midlands Region should be at most 50% of national population growth. In fact, the projections assume figures that are below 50% for the Eastern and Midlands Region: 46% for the low figure in the population projection range and 45% for the high figure in the range.¹⁸

The relevance of the NPF and the Implementation Roadmap as a basis for population projections at County level is confirmed in the recently published Draft Guidelines for Development Plans where it is stated:

*'...The National Planning Framework (NPF) and associated NPF Roadmap 2018 document provide overall strategic projected population target ranges for each local authority area.'*¹⁹

The question is: "are these assumptions regarding national distribution of population growth up to 2031 across the country realistic?" It would appear that they are not. Statistics published by the Census on planning permissions show that in the period 2018 up to the first quarter of 2021, only 40% of dwelling units that were granted planning permission during that period, were located outside the Eastern and Midland Region. The remainder (59.4%) were located in the Eastern and Midlands Region. If 2018 is excluded, the figures show that the proportion of all dwelling units granted planning permission that were outside the EMRA region was even less (39%) with the remainder (61%) within the EMRA region. In other words, a move away from the objectives of the NPF rather than *towards* them.

These trends are even more pronounced if the planning permissions for schemes of minimum 100 dwelling units are considered. During this period of analysis, almost all such permissions were granted by An Bord Pleanála under the provisions of Strategic Housing Developments. The statistics of the units granted under SHD permissions are therefore of interest. Table 7.3 below illustrates the breakdown across the regions of the units granted under SHD permissions. Again, the figures illustrate the same picture: the national distribution of dwelling units granted permission is different from the National Planning Framework policy objectives and the trend is away from the NPF rather than towards it.

What this divergence between policy ambitions and real housing need means in practical terms can be illustrated as follows. If a 60/40 split is assumed (i.e. 60% of dwelling units in the EMRA regions with 40% outside it) instead of the 45/55 split under the Implementation Roadmap, the population projection for the EMRA region should be adjusted upwards by 100,000 people.

Key Point: The overall conclusion in relation to the question: 'Are the population projections correct?' is that the population projections up to 2031 under the Roadmap document are too low and underestimate the reality of growth of development in the EMRA region.

¹⁸ Implementation Roadmap for the National Planning Framework, Govt. of Ireland, July 2018, Appendix 2, p. 13.

¹⁹ Development Plan Guidelines for Planning Authorities, August 2021, p. 51.

Region	All Dwelling Units	
<i>Q1 2019 – Q1 2021</i>	Total	% Total
State	134,886	100%
Northern and Western	14,834	11%
Southern	37,565	28%
Eastern and Midland	82,487	61%
<i>Q1 2018 – Q1 2021</i>	Total	% Total
State	183,952	100%
Northern and Western	20,692	11%
Southern	54,006	29%
Eastern and Midland	109,254	59%

Table 7.2: Dwelling Units Granted Planning Permissions

Source: CSO

Region	Dwelling Units Granted Under SHD Permissions	
<i>Q1 2019 – Q1 2021</i>	Total	% Total
State	46,306	100%
Northern and Western	1,062	2%
Southern	4,720	10%
Eastern and Midland	40,524	88%
<i>Q1 2018 – Q1 2021</i>	Total	% Total
State	53,950	100%
Northern and Western	1,387	3%
Southern	6,064	11%
Eastern and Midland	46,499	86%

Table 7.3: Dwelling Units Granted Planning Permissions in SHD Permissions

Source: www.pleanala.ie

7.5 Question Four: Is the Household Size Figure Realistic?

The Draft Development Plan states the following in relation to the assumed change in household size during the lifetime of the new development plan:

*'...By 2028, with a total population of 325,285 persons and a total housing stock of 118,632 houses, the household size will be an average of 2.74 per house. This is a reduction from the 2.99 in 2016 and is consistent with the downward national trend of household size, from 2.75 in 2016 to 2.5 in 2040, outlined under the National Planning Framework.'*²⁰

²⁰ South Dublin Draft County Development Plan 2022-2028, p. 29.

Statutory guidelines for incorporating housing supply targets into Development Plans were issued under Section 28 of the Planning Act in 2020.²¹ These guidelines use the ESRI report as a basis.²² However, the household size assumptions that are adopted in the ESRI report have been criticised in a recent report by Prof. Ronan Lyons:

*'...Finally, and most crucially in explaining their unusually low estimate of housing need, they assume that household size stays at 2016 levels. By so doing, they eliminate one of the largest likely sources of housing need.'*²³

The report by Prof. Lyons suggests that a decline of the average household size to 2.3 or below that figure by 2050 is a realistic assumption.²⁴ It concludes that the Housing Need and Demand Assessment adopts an average household size of 2.67 in Ireland as late as 2040,

*'...even though existing demographics in 2016 already implied a true household size of between 2.4 and 2.45.'*²⁵

For a target population in the county of 325,285 No. in 2028,²⁶ a difference in household size between the adopted 2.74 in the Draft Development Plan and the suggested 2.4 figure or less as advised elsewhere, would result in a difference of 16,818 No. houses needed for the county population. At a gross density of 35 No. dwellings per hectare this would mean the need for an additional 480 No. hectares, equivalent to the entire amount of land zoned in the current Draft Development Plan (exc. SDZs and long term strategic lands).

Similarly, research prepared by KPMG Future Analytics entitled '*An Assessment of Housing Need Calculation in the Draft South Dublin County Development Plan 2022-2028*' has been enclosed as Appendix F of this Submission. This research assesses a single, but important variable used in the South Dublin Housing Need Demand Assessment (HNDA) related to the application of Average Household Size (AHS). The research provides the justification for a more evidenced 2.5 pph target, over 2.74 pph considering the range of demographic, housing market and policy factors that better illustrate the lack of unit development obstructing smaller household sizes forming, and perpetuating the larger AHS that exists.

Key Point: The answer to the question: '*Is the Household Size figure realistic?*' must also be negative. If a more realistic household size figure of 2.4 is assumed, the amount of zoned land that is need would be twice the amount that is provided for in the Draft Plan.

The evidence based research undertaken by KPMG Future Analytics suggests a figure of 2.5 as more appropriate. The consequences of using an incorrect figure are major and thus the household figure to be utilised requires rigorous consideration.

²¹ *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities*, DHLGH, December 2020 (or the 'HST Guidelines').

²² *Regional Demographics and Structural Housing Demand at a County Level*, Adele Bergin And Abián García-Rodríguez, ESRI, December 2020.

²³ *Institutional Investment and the Private Rental Sector in Ireland*, Ronan C. Lyons, June 2021, p. 29.

²⁴ *Institutional Investment and the Private Rental Sector in Ireland*, Ronan C. Lyons, June 2021, Table 2, p. 28.

²⁵ *Institutional Investment and the Private Rental Sector in Ireland*, Ronan C. Lyons, June 2021, p. 29.

²⁶ *South Dublin Draft County Development Plan 2022-2028*, p. 29.

7.6 Conclusions

This part of the Submission on the Draft Development Plan does not address the question of the *location* of the zoned lands for residential development but rather the total *amount*. It is concluded that the core strategy of the Draft Development Plan seriously under estimates the amount of land that should be zoned for residential development. The reasons for this are as follows:

- A certain proportion of the zoned lands that were zoned in previous Development Plans (legacy lands) are likely to remain undeveloped.
- The provision for 'headroom' or 'additional provision' of zoned lands is too restrictive which means that the Plan will lack the necessary flexibility given the uncertainty about which lands will be developed.
- The population projections up to 2031 under the Roadmap document are too low and underestimate the reality of growth of development in the EMRA region.
- The core strategy adopts an average household size that is too high and does not reflect current and projected household formation figures.
- The implications of these factors are significant. If a 60/40 split of population growth is assumed instead of the 45/55 split under the Implementation Roadmap, the population projection for the EMRA region should be adjusted upwards by 100,000 people. If a more realistic household size figure of 2.4 is assumed, the amount of zoned land that is needed would be twice the amount that is provided for in the draft plan.

8.0 NEWLANDS FARM PRESENTS A CLEAR SOLUTION TO ACT NOW TO TRY AND PREVENT THE FURTHER EXACERBATION OF THE HOUSING CRISIS IN SOUTH DUBLIN

8.1 Potential of the Subject Lands Needs to be Realised

As outlined throughout this submission, the subject lands hold significant potential to deliver a compact urban form at a suitable location within a comfortable walking distance of high-capacity public transport infrastructure. This will allow future residents to live without the reliance on a private car and thus, freeing up space to be allocated to green areas which previously would be required for surface car parking.

Any proposed development on the subject lands will see the delivery of a significant quantum of public open space which is currently in agricultural use and the reuse and opening up of historic buildings that are prone to anti-social activities and are currently inaccessible to the public.

Earlier in this submission, we looked to national, regional and local policy to gain an understanding for why the continued leapfrogging of the subject lands was taking place. Throughout the policy context (at National, Regional and Local level), a clear need for more compact urban forms is continually reiterated as the overriding them to achieve more sustainable planning and a better quality of life.

Key Point: The subject lands have very significant potential to deliver an exemplar transport oriented development at a highly visible junction of routes marking a key entrance gateway to the city. The Submission has outlined concerns regarding the issue of significant tracts of zoned lands in South Dublin County Council not being developed yet retaining their zoning over an inordinate length of time, insufficient headroom and underestimating household size. The rezoning of the subject lands presents a solution to issues raised – Hibernia REIT are fully funded and willing to develop pending the appropriate zoning of the lands.

8.2 A Changed Development Imperative

The National media is daily focused on articles regarding housing shortages and associated artificial interferences in housing prices and rental costs. More homes (to buy and to rent) need to be delivered and those homes need to be in the right places.

We would urge South Dublin County Council to fully consider the role that Newlands Farm could have in the future of South Dublin. The generation of young people urgently needing new homes won't be helped by the continued zoning of lands that have been appropriately zoned but not developed over the past 18 No. years. We strongly contend that it is time for a changed development imperative. It is time to consider the 'use it or lose' it Strategy. Those that have not developed their lands should not be entitled to retain the zoning indefinitely. To do so, compounds issues in a residential development cycle that is already not functioning. Hibernia REIT want to develop the subject lands at Newlands Farm and have the funds to do so.

9.0 CONCLUSION

The purpose of this Submission is to propose the rezoning of the subject lands as part of the *Draft South Dublin County Development Plan 2022-2028*. The lands are currently part zoned Objective 'RU' – Rural and Agriculture and part zoned Objective 'EE' – Enterprise and Employment. We propose a rezoning of the Objective 'RU' lands to Objective 'RESN' – *'To provide for new residential communities in accordance with approved area plans,'* and Objective 'EE' lands to Objective 'REGEN' – *'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.'*

The suitability of the subject lands for residential and associated development has been demonstrated throughout this Submission owing to their ability to deliver a compact urban form in close proximity to a range of local services and amenities as well as high-capacity public transport infrastructure alongside a significant portion of public open space and a new east to west greenbelt across the lands.



Appendix A: Water Infrastructure Assessment Report by OCSC Consulting Engineers

Water Infrastructure Assessment Report

**Lands at Newlands Cross
For Hibernia REIT**

**PROJECT NO. H660
03 September 2021**



OCSC
O'CONNOR | SUTTON | CRONIN

Multidisciplinary
Consulting Engineers



Water Infrastructure Assessment Report

**Lands at Newlands Cross
for Hibernia REIT**

**PROJECT NO. H660
3 September 2021**

**Water Infrastructure Assessment
Report
for
Lands at Newlands Cross,
South County Dublin.**



NOTICE

This document has been produced by O'Connor Sutton Cronin & Associates for its client, *Hibernia REIT*. It may not be used for any purpose other than that specified by any other person without the written permission of the authors.



DOCUMENT CONTROL & HISTORY

OCSC Job No.: H660	Project Code	Originator	Zone Volume	Level	File Type	Role Type	Number	Status / Suitability Code	Revision
	H660	OCSC	XX	XX	RP	C	0001	S2	P02
Rev.	Status	Authors	Checked		Authorised		Issue Date		
P02	S2	MK	AH		PH				
P01	S2	MK	AH		PH		26.08.2021		

Water Infrastructure Assessment Report

TABLE OF CONTENTS

PAGE

1 INTRODUCTION	2
1.1 Appointment.....	2
1.2 Scope of Report.....	2
1.3 Site Location and Context	2
2 SURFACE WATER DRAINAGE.....	3
2.1 Existing Watercourses	3
2.2 Existing Surface Water Drainage Infrastructure	3
2.3 Existing Catchment Areas	4
2.4 Proposed Development Context	7
2.5 Sustainable Drainage Systems	7
3 WASTEWATER DRAINAGE	9
3.1 Existing Wastewater Drainage Infrastructure	9
3.1 Proposed Development Context	10
4 POTABLE WATER SUPPLY	11
4.1 Existing Watermain Infrastructure	11
4.2 Proposed Development Context	12
5 PRELIMINARY FLOOD RISK ASSESSMENT	13
5.1 Overview	13
5.2 Historical Flooding.....	13
5.3 Fluvial Flooding	13
5.4 Pluvial Flooding.....	14
6 CONCLUSION	15

1 INTRODUCTION

1.1 Appointment

O'Connor Sutton Cronin & Associates (OCSC) have been appointed by *Hibernia REIT* to assess the suitability of existing drainage and water infrastructure in the vicinity of subject lands that are outlined in the main body of this report.

1.2 Scope of Report

This report outlines how the proposed potential development site can be serviced by drainage and water networks, along with providing a Preliminary Flood Risk Assessment and an overview of suggested Sustainable Drainage Systems that should be implemented as part of the masterplan development.

The report was prepared by reviewing the available data from the Local Authority sources and national bodies *i.e.* South Dublin County Council, Irish Water, The OPW, and the wider Design Team.

The proposed design, for the above services, have been carried out in accordance with the following technical guidelines and information:

- South Dublin County Council Development Plan;
- Greater Dublin Strategic Drainage Study (GDSDS);
- Greater Dublin Regional Code of Practice for Drainage Works (GDR COP);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (Department of Environment, Heritage and Local Government and the Office of Public Works).
- Irish Water Code of Practice for Wastewater, IW-CDS-5030-03;
- Irish Water Code of Practice for Water Supply, IW-CDS-5020-03;
- Irish Water Drainage & Watermain Records;
- CIRIA C753 – The SuDS Manual;

1.3 Site Location and Context

The subject lands are located just west southwest from the N7 Red Cow / M50 junction (Junction 7), and comprises approximately 58-ha total. Refer to the main body of this report for details of site location and context.

2 SURFACE WATER DRAINAGE

2.1 Existing Watercourses

There are a number of local watercourses that traverse the development lands, which appear to facilitate drainage of the surrounding agricultural fields. These watercourses are typically ditches, lined with hedgerows, and are interconnected within the site; joining to traverse in an easterly direction across the public lands, south of the crematorium building and between the existing football pitches, before discharging to the pond at Ballymount Park. Refer to **Figure 2.1** for further context.

The outlet from the pond at Ballymount Park appears to discharge via a 1600mm diameter culvert, under the M50, prior to discharging to the River Camac downstream.

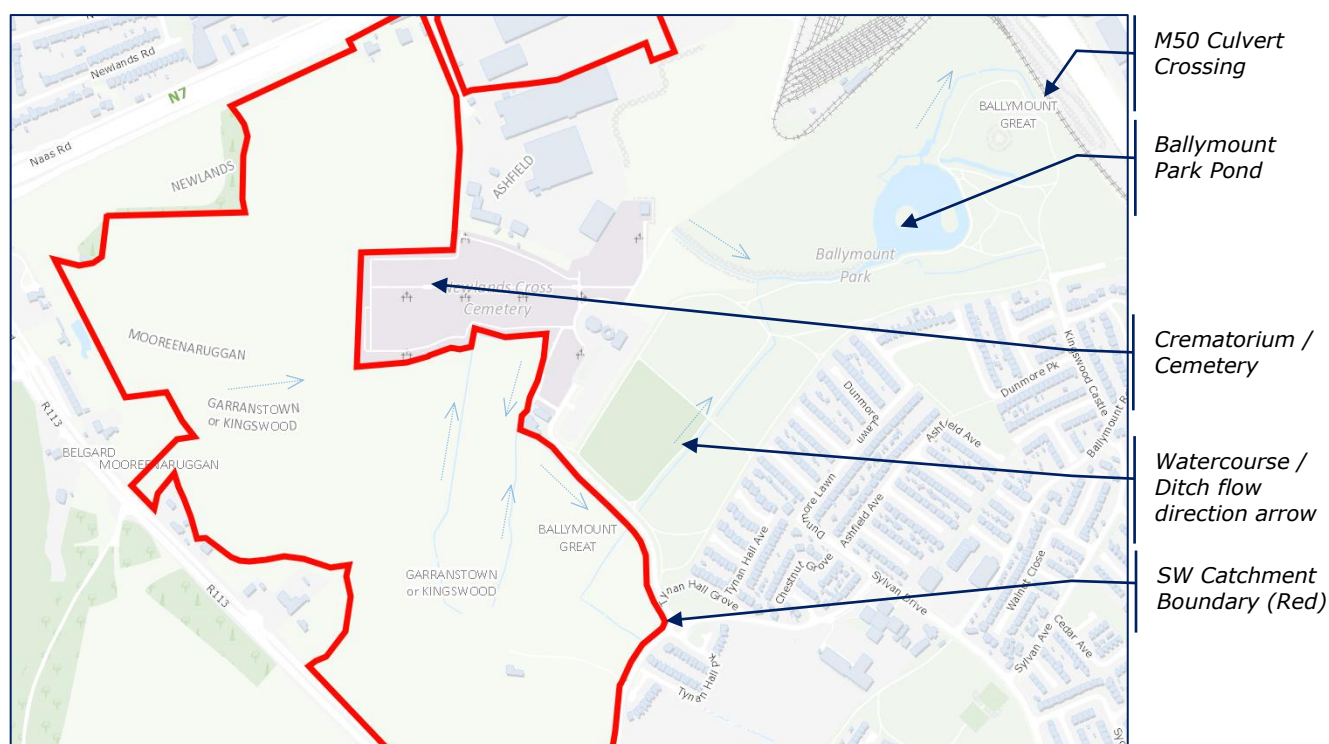


Figure 2.1 – Existing Local Watercourses

2.2 Existing Surface Water Drainage Infrastructure

All roads that bound the subject development site are served by public surface water drainage infrastructure. Refer to **Figure 2.2** for overview of existing

public infrastructure, as sourced from GSI online interactive mapping. A review of these existing records indicate apparent outlets from the public surface water infrastructure to the development lands, as denoted by the red star icon (★), in **Figure 2.2**. It is understood that these discharge from the public surface water drainage infrastructure is conveyed across the lands via the aforementioned watercourses, which in turn discharges to the River Camac via the pond at Ballymount Park and the 1600mm culvert crossing under the M50 motorway, at the location denoted by the green star icon (★), in **Figure 2.2**.

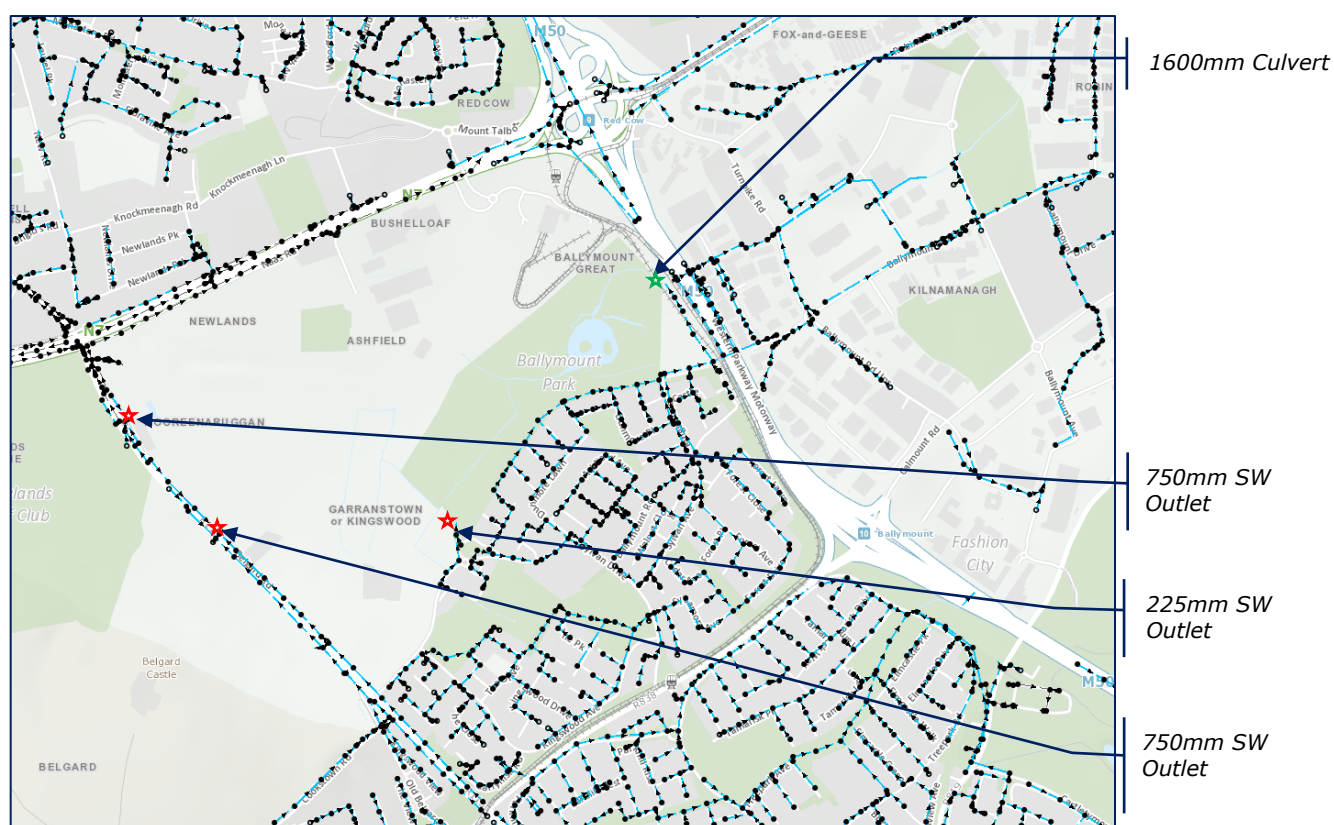


Figure 2.2 – Existing Public Surface Water Infrastructure

2.3 Existing Catchment Areas

The overall c.130-hectare catchment area, includes the subject development lands, which comprises the subject lands (*i.e.* existing industrial facility and c.55-hectare of agricultural lands); a cemetery / crematorium; the LUAS Red Cow depot; Ballymount Park; and a number of sports pitches.

A review of aerial imagery and site visits to the subject lands indicate that the vast majority of the overall surface water (SW) catchment area is currently considered greenfield, or equivalent. Refer to **Figure 2.3** for further context.



Figure 2.3 - Aerial Imagery of SW Catchment (OSi)

Further to site walks of the subject lands, followed by a detailed review of topographical survey information and LiDAR data sourced from OSi, it is clear that there are dominant gradients from higher levels at both the north / northwest boundary and the south / southwest boundary, towards the lower area at Ballymount Park, at the mid-eastern boundary of the development site. This appears consistent with the natural flow of the existing ditches described in **Section 2.1**.

An overview of the topographical and LiDAR data obtained, and the generated conour heiths can be seen in **Figure 2.4**.

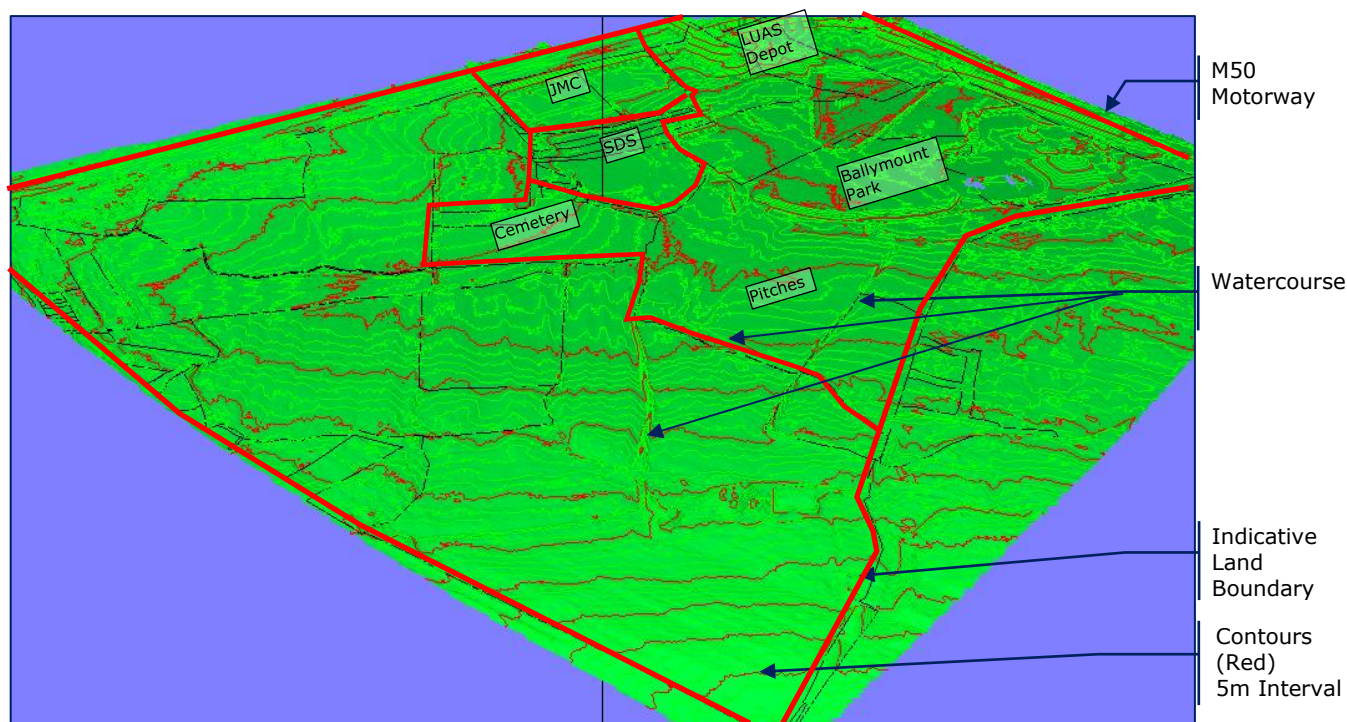


Figure 2.4 – Site Levels and Contour Overview (LiDAR)



Figure 2.5 - Aerial Image, similar to View for Figure 2.4 (Google Earth)

2.4 Proposed Development Context

Standard Requirements of South Dublin County Council's Drainage Division should be incorporated into the design, as follows:

- a) The developer should comply with the Greater Dublin Regional Code of Practice for Drainage Works, Version 6.0.
- b) The drainage for the proposed development shall be designed to have completely separate foul and surface water systems.

In similar context, the proposed surface water drainage design should comply with South Dublin County Council's County Development Plan, and in particular its policies with regards to provision of blue and green infrastructure.

All new surface water drainage infrastructure should be designed to allow for an additional 20% increase in rainfall intensity, to allow for Climate Change projections, in accordance with the South County Council Development Plan and the GDSDS.

As described in **Section 2.1**, the natural topography of the subject lands directs the rainfall runoff, via the natural watercourses and ditches, towards the pond at Ballymount Park, which discharges to the River Camac downstream, via a 1600mm culvert system that is routed under the M50 motorway.

New development can easily maintain the existing natural hydrology and behaviour of the rainfall runoff by implementing an integrated sustainable drainage system that will promote natural infiltration and continue to convey attenuated runoff towards the pond at Ballymount Park via the existing watercourses / ditches.

2.5 Sustainable Drainage Systems

An indicative masterplan layout has been developed by Urban Agency, which outlines typically how the subject lands may be developed. The proposed masterplan lends itself to the provision of both blue and green infrastructure, in line with SDCC's planning policies, by way of a green belt through the site

and significant open space that will allow for implementation of several sustainable drainage systems.

There is a wide variety of ways that Sustainable Drainage Systems (SuDS) can be implemented into new development, and given the scale of the proposed potential development, the primary measures that will be considered include:

- Blue / Green Roofs and Living Walls on block developments, where expansive roof and wall space is proposed;
- Individual infiltration systems for roof runoff from house units and apartment blocks;
- Pervious paving for driveways and car parking areas, where appropriate;
- Rainwater Harvesting and water saving devices;
- Retention of existing watercourses by implanting them into the development design. These may be culverted and / or diverted in parts to facilitate development;
- Introduction of swales, infiltration trenches etc.. to promote infiltration;
- Integrated attenuation, detention and / or retention ponds or underground systems, within each individual sub-catchment;
- Rainfall runoff equal to, or below, the greenfield runoff rate equivalent;
- Treatment of all rainfall runoff in accordance with GDSDS, the SuDS Manual and best practice.

Consideration and provision of the above listed SuDS will help deliver a sustainable and enhanced biodiversity development, with greatly improved water runoff quality and reduced water runoff volumes, in accordance with the South Dublin County Council Development Plan.

3 WASTEWATER DRAINAGE

3.1 Existing Wastewater Drainage Infrastructure

There is significant public wastewater infrastructure both to the north and south of the subject lands, as indicated in **Figure 3.1**, which is sourced from GSI's online interactive mapping of Irish Water's assets. The existing JMC industrial facility currently discharges wastewater from its building to the wastewater pumping station (WWPS) at St Brigid's Cottages, on the opposite side of the Naas Road (N7), via its on WWPS. This discharges the pumped wastewater to the local public wastewater gravity network, which ends up discharging to the oversized public sewer at the Naas Road, just northeast from the Long Mile Road junction.

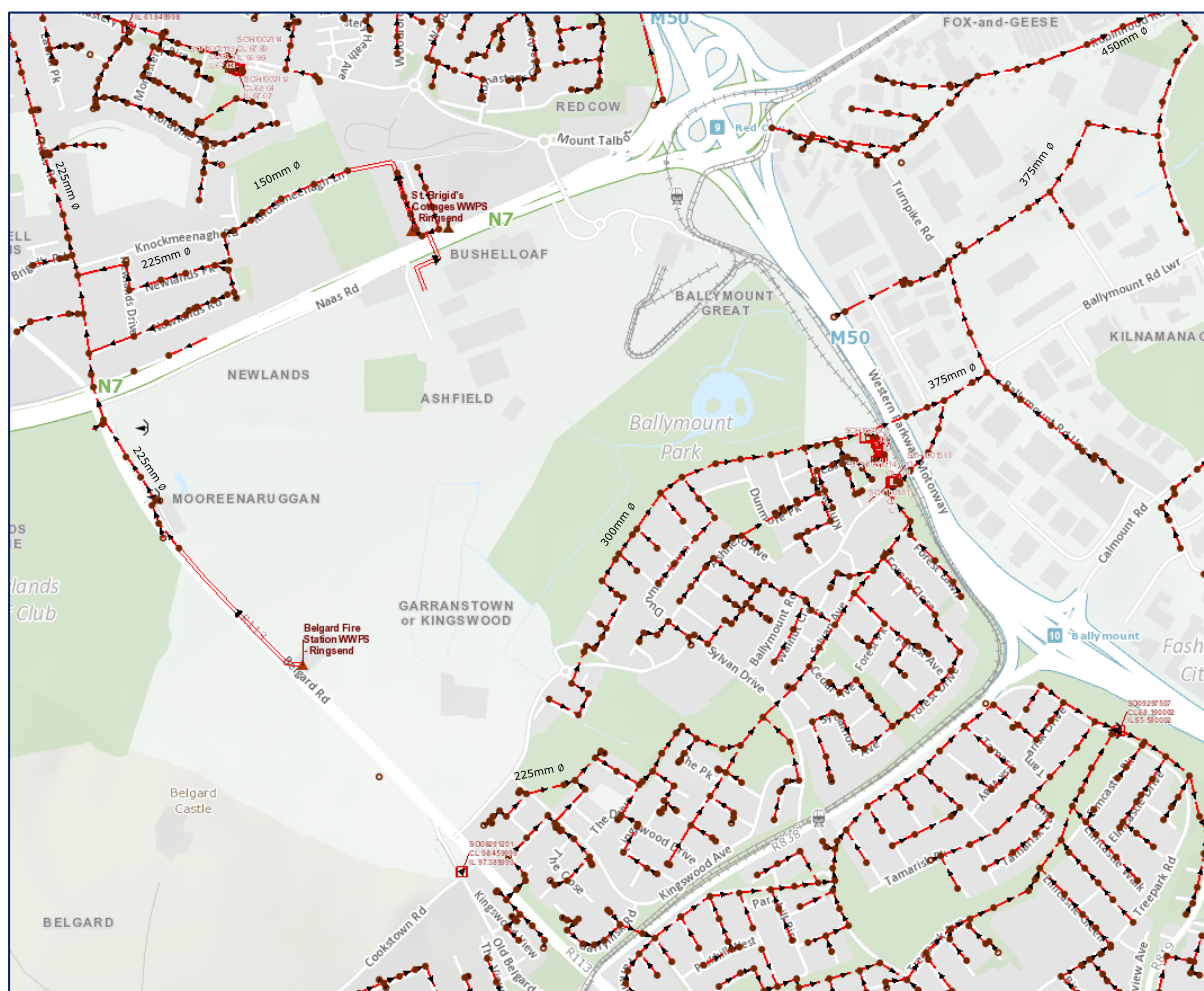


Figure 3.1 – Existing Wastewater Infrastructure

The existing residential area, located between the southern boundary of the site and the LUAS Red line (Kingswood Ave), is part of a separate gravity wastewater network that is routed under the M50 motorway, before joining with the network serving the St Brigid's Cottage, further along the Naas Road, whereby the size of the public wastewater infrastructure increases significantly to 1350mm diameter.

The residential areas south and west from the LUAS Red Line are all served by a different wastewater network (Cookstown / Belgard) than that described above.

3.1 Proposed Development Context

All new wastewater infrastructure will be required to be designed and installed in accordance with Irish Water's Code of Practice for Wastewater Infrastructure, and will require detailed discussions with Irish Water, for agreement of locations to provide development connection(s), to best serve any proposed development.

As indicated in **Section 3.1**, there is significant public wastewater infrastructure in the immediate vicinity (north and south) of the subject lands, from which new development can be served. Following preliminary discussions with Irish Water, it is expected that a connection to the public network (300mm dia.) that aligns the southern boundary of the site would be more favourable.

Any new connection to the public wastewater infrastructure will be carried out in agreement with Irish Water, by following their Pre-Connection Enquiry and New Connection Application processes, as is standard practice.

4 POTABLE WATER SUPPLY

4.1 Existing Watermain Infrastructure

There is significant public wastewater infrastructure both to the north and south of the subject lands, as indicated in **Figure 4.1**, which is sourced from GSI's online interactive mapping of Irish Water's assets. The existing JMC industrial facility is currently served by a 200mm asbestos connection from the 300mm Ductile Iron public watermain along the westbound carriageway of the Naas Road.

There is also a trunk public 24" asbestos watermain that traverses the southern boundary of the subject lands, and an 18" asbestos watermain along Belgard Road, which aligns the western boundary of the subject lands.

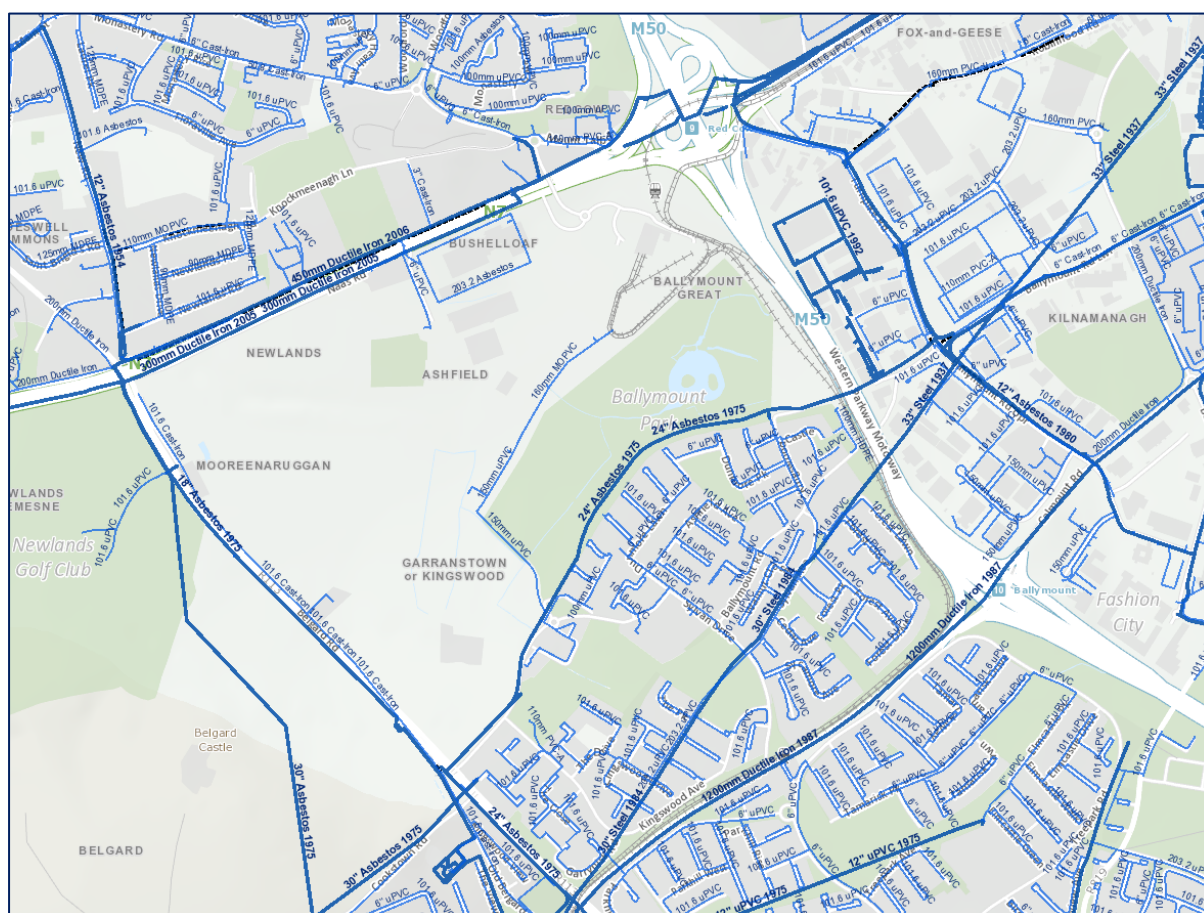


Figure 4.1 - Existing Public Water Infrastructure

4.2 Proposed Development Context

All new watermain infrastructure will be required to be designed and installed in accordance with Irish Water's Code of Practice for Water Infrastructure, and will require detailed discussions with Irish Water, for agreement of locations to provide development connection(s), to best serve any proposed development.

As indicated in **Section 4.1**, there is significant public watermain infrastructure in the immediate vicinity of the subject lands, from which any development can be served.

Any new connection from the public watermain infrastructure will be carried out in agreement with Irish Water, by following their Pre-Connection Enquiry and New Connection Application processes, as is standard practice.

5 PRELIMINARY FLOOD RISK ASSESSMENT

5.1 Overview

The purpose of the flood identification and assessment studies is to identify the risk of flooding to subject lands and potential flooding as a result of the proposed development.

5.2 Historical Flooding

A preliminary review of available records suggest that there is no apparent anecdotal evidence of flooding on the subject site.

5.3 Fluvial Flooding

A review of the OPW's CFRAM mapping for the River Camac, along with South Dublin County Council's Strategic Flood Risk Assessment for their Development Plan, indicates that the flood extent associated with the 0.1% Annual Exceedance Probability (AE), or 1 in 1000-year rainfall event, is contained within the channel for the modelled watercourse, with some minor increase in extent at the pond, at Ballymount Park. Refer to **Figure 5.1** for context.

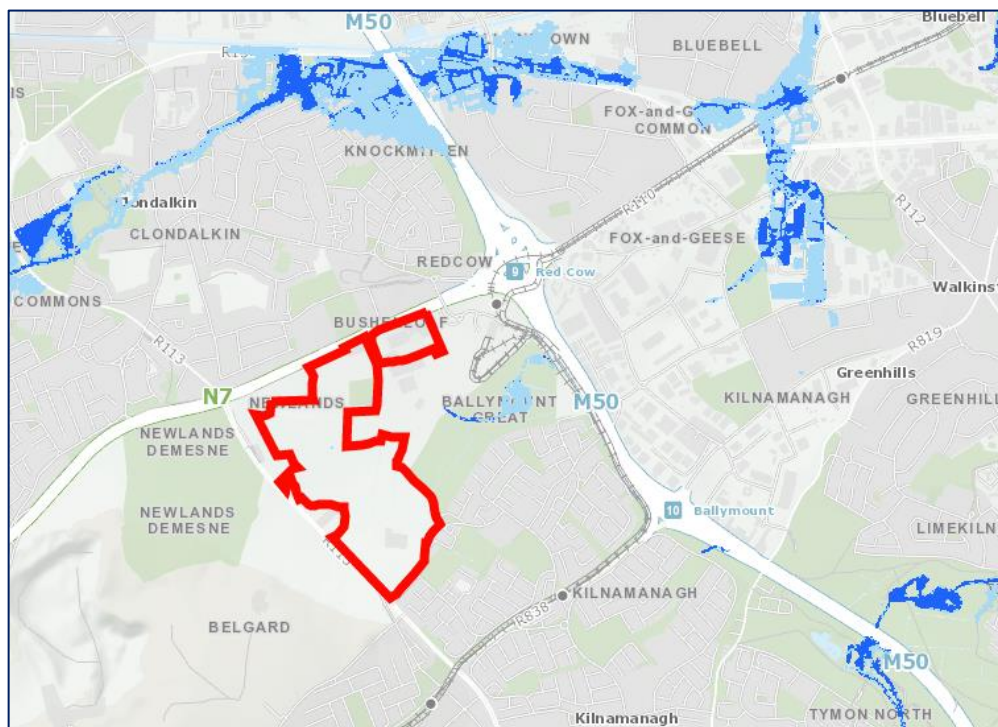


Figure 5.1 - River Camac CFRAM excerpt

Therefore, the subject lands are considered to be sited within **Flood Zone C**, and considered appropriate land use for '**Highly Vulnerable Development**' such as residential, in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*.

5.4 Pluvial Flooding

Dublin City Council's pluvial study (FloodResilienCity) extends partially over the subject lands, and indicates areas that may be subject to pluvial flooding during extreme rainfall events. Refer to **Figure 5.2** for context.

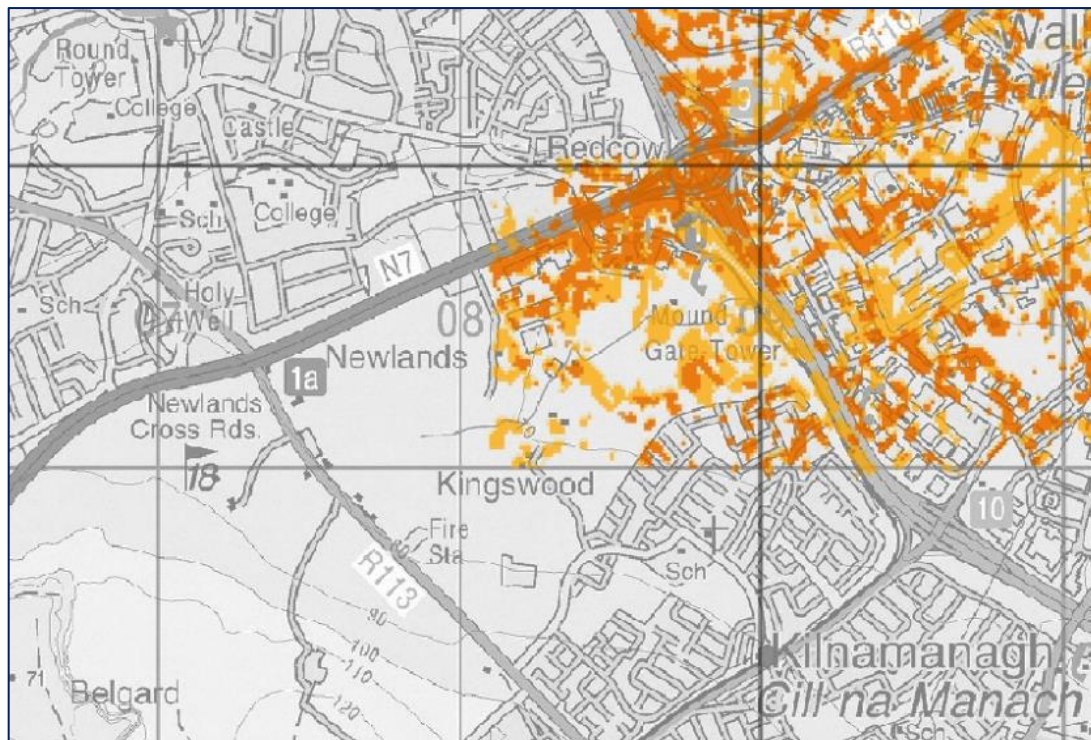


Figure 5.2 - Pluvial Flood Extent (DCC's FloodResilienCity)

However, it is noted that that any new development will require to be served by an extensive surface water drainage network, which will alleviate any such flood risk for the betterment of the potential development.

6 CONCLUSION

The site is located within Flood Zone C, for fluvial flooding, with CFRAM mapping for the modelled River Camac indicating flood extent remaining within the channel of the small watercourse that traverses the subject lands, with some minor flood extent downstream at the Ballymount Park pond. New development is to ensure no adverse risk of flooding is created on site, or downstream, as a result of new development, through design.

A review of existing infrastructure indicates that there is significant existing public drainage and watermain infrastructure in the immediate vicinity of the site that can serve new development on the subject lands.

New development will require discussions and agreement with Irish Water through both the Pre-Connection Enquiry and New Connection Application processes, as is standard practice, to confirm and agree location and condition of connections to both wastewater and watermain infrastructure.

Preliminary master-planning for the subject lands indicate the ability to integrate a comprehensive arrangement of Sustainable Drainage Systems that will greatly improve the quality and reduce the volume of rainfall runoff discharging from site, while enhancing the biodiversity of the overall development.



Appendix B: Preliminary Transport Assessment by OCSC Consulting Engineers

PRELIMINARY TRANSPORT ASSESSMENT

LANDS AT NEWLAND CROSS

Hibernia REIT

Project No. H660
8th September 2021



PRELIMINARY TRANSPORT ASSESSMENT

LANDS AT NEWLANDS CROSS



OCSC

O'CONNOR | SUTTON | CRONIN

Multidisciplinary
Consulting Engineers

NOTICE

This document has been produced by O'Connor Sutton Cronin & Associates for its client. It may not be used for any purpose other than that specified by any other person without the written permission of the authors.



DOCUMENT CONTROL & HISTORY

OCSC Job No.: H660	Project Code	Originator	Zone Volume	Level	File Type	Role Type	Number	Status / Suitability Code	Revision
	H660	OCSC	XX	XX	RP	C	0002	S2	P02

Rev.	Status	Authors	Checked	Authorised	Issue Date
P02	S2	P. Raggett	I. Crehan	P. Healy	08/09/2021
P01	S2	P. Raggett	I. Crehan	P. Healy	08/09/2021
P01	S3	P. Raggett	I. Crehan	P. Healy	03/09/2021

INDEX

PAGE

1. INTRODUCTION.....	1
2. OVERVIEW OF THE SUBJECT LANDS	2
3. SITE ACCESSIBILITY	8
4. LOCAL TRAVEL PATTERNS	19
5. POTENTIAL ACCESS, ROAD DESIGN & TRAFFIC IMPACT.....	21
6. DESIGN MEASURES TO FACILITATE SUSTAINABLE TRAVEL..	26
7. SUMMARY & CONCLUSIONS.....	28

1. INTRODUCTION

O'Connor Sutton Cronin & Associates (OCSC) have been commissioned to undertake this preliminary assessment with respect to the subject lands located to the southwest of The N7/M50 Red Cow Junction (Junction 7) as indicatively shown below.

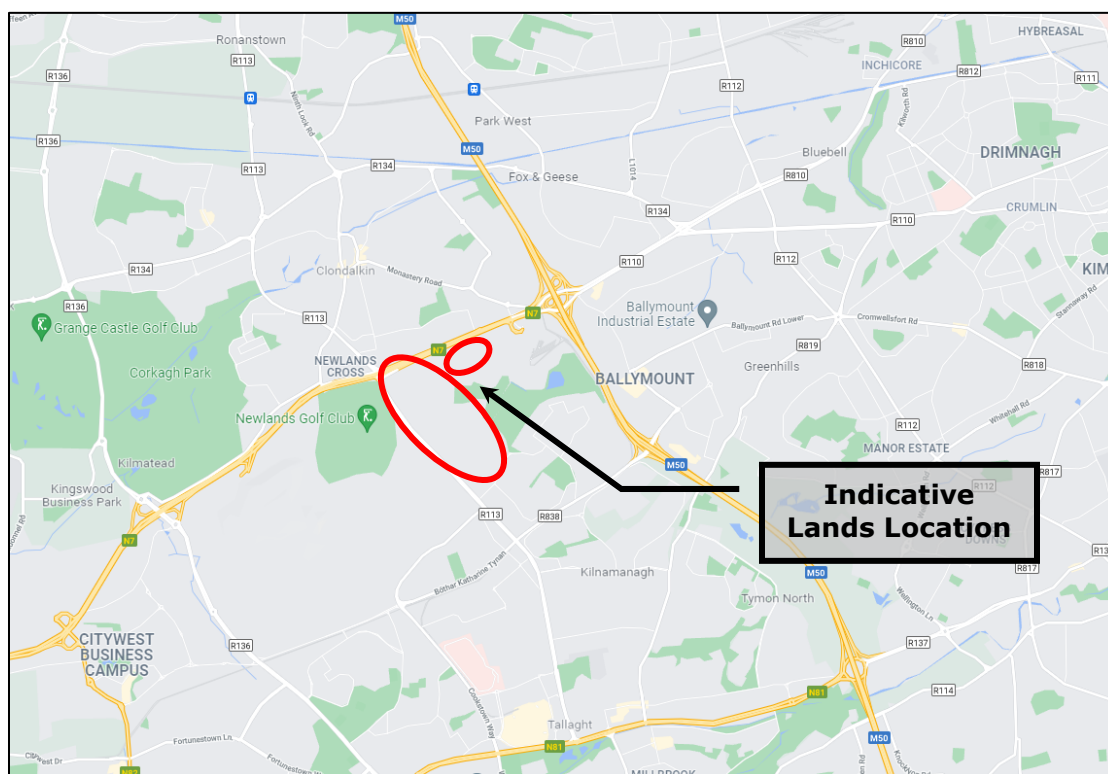


Figure 1: Indicative Site Location Map

The purpose of this report is to assess the transportation characteristics of the site and local area and to further assess the development potential for the subject lands with respect to a residential use.

In this regard, due consideration has been given to both existing and proposed transport infrastructure along with key documents including the South Dublin County Development Plan and the Transport Strategy for the Greater Dublin Area 2016 – 2035 and the Traffic & Transport Assessment Guidelines (2014).

2. OVERVIEW OF THE SUBJECT LANDS

The subject lands and associated boundaries are shown in further detail below.



Figure 2: Subject Lands Boundary

As can be seen, the lands are divided into 2 parcels, separated only by an existing local access road from the N7. The main land parcel is greenfield in nature while the smaller parcel currently houses an existing industrial use which has its sole access off the aforementioned N7 access road, though it is noted this road also serves additional industrial uses to the south of this parcel which are outside of the subject lands. The main land parcel has an existing gate entrance on Ballymount Road along with minor entrances on the N7.

The lands are bound by the N7 to the north, 3rd party lands to the northwest, the R113 Belgard Road to the west, Ballymount Road to the south and third party lands to the east meaning they have notable road frontage which is discussed in further detail following.

In a wider context, the areas to the immediate east southeast and to the north on the opposite side of the N7 are primarily residential in nature with additional ancillary facilities including retail, schools etc. Tallaght lies further south with extensive associated industrial and employment uses. The Luas stop and depot to the east is the most significant use of note before the M50 while the lands to the west are less developed and comprise of a golf club and agricultural lands.

N7 Overview

The N7 is one of the key arteries to/from Dublin City and has been subject to significant upgrade works over recent years including the grade separation of Newlands Cross and the construction of the Luas Red Line and associated roads infrastructure. The section of the N7 in question is approximately 1.4km long between the upgraded Newlands Cross interchange and the M50 Junction 7. It has a relatively complex cross section, with 6 lanes (3 in each direction) provided but with variations on approach to the respective junctions including additional lanes local access, merging and diverging lanes, bus lanes etc. The north and south portions of the carriageway are physically separated and interim junctions on the south portion are limited to the aforementioned access road serving a portion of the subject lands and the access to the Luas Red Cow stop/depot.

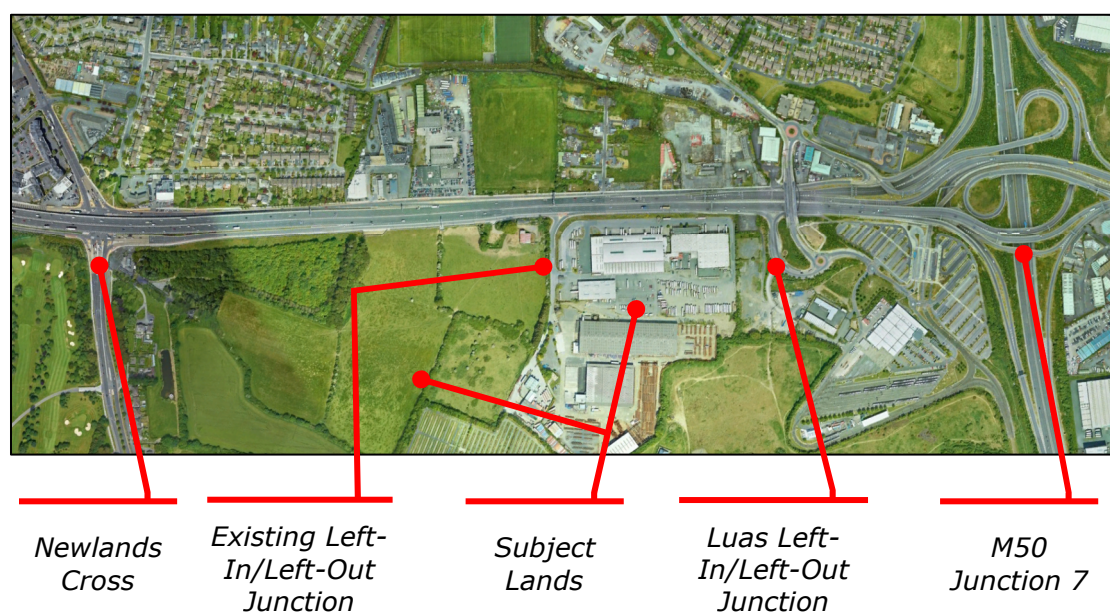


Figure 3: N7 Layout

As noted, the junction on the N7 which facilitates access to a portion of the subject lands operates as a left-in/left-out only due to the overall layout of the N7. However, the junction itself is segregated from the wider N7 and access is limited to a single lane which is isolated from the remainder of the main carriageway. This lane links to the south slip lane from the N7 at Newlands cross.



Figure 4: Existing Left-In/Left-Out Entrance on N7 Serving Position of Subject Lands

This configuration was adopted in 2015 as part of the Newlands Cross upgrade and is presumed to have been developed as a safety measure to limit the potential for merging/diverging traffic along this short section of the N7.

There are dedicated pedestrian and cycle facilities along the full length of this section as far as the Luas junction.

There are also a number of additional, minor gated entrances to the subject lands from the N7 which are facilitated by simple drop kerb arrangements.



Figure 5: Additional Existing N7 Entrances

R113 Belgard Road Overview

The R113 is a high quality dual carriageway adjacent the subject lands which includes 2 lanes of general traffic in each direction. There are also dedicated bus lanes along sections of this road. It is one of the primary arteries in the local area, acting as a link between the N81 (Tallaght) and the N7 and continuing north to the N4 (Lucan).



Figure 6: R113 Looking North at Subject Lands Boundary

Existing entrances on this section of the R113 are limited, with the majority of properties on the east side served by a parallel local access road which has a single junction with the R113. However, there are a small number of entrances on the west side of the carriageway which operate under a simple priority configuration such as the entrance to Belgard Castle.

There are existing footpaths linking to the aforementioned N7 facilities to the north and to Tallaght to the south, with dedicated pedestrian crossing facilities at all major junctions along the route. There are also on-road cycle lanes along the majority of the R113 length between the N7 and N81.

Ballymount Road

Ballymount Road is a single carriageway of varying width along its length between c.6-9m. Its primary function is to facilitate local access to the residential developments in this area. There is an existing footpath on the south/east side of the road but no pedestrian infrastructure along the north/west side including along the subject land's frontage though this could be partially addressed by the development of the subject lands.

The site has an existing entrance which facilitates access to the agricultural use on the subject lands.



Figure 7: Subject Lands Entrance on Ballymount Road

There is a second historical entrance further north on Ballymount Road which is currently not in use.



Figure 8: Subject Lands Secondary Entrance on Ballymount Road

3. SITE ACCESSIBILITY

The accessibility of any landholding is a critical factor with respect to its feasibility in transportation terms. This is particularly relevant for a residential site which will result in commuting trips during peak times. Therefore, a high level of accessibility by sustainable modes can predispose a site to a positive modal split weighted away from car based travel and limit the traffic impact potential on the local road network. This is particularly important when considering the proximity of the N7 and maintaining its role in the national road network.

In addition to the accessibility by road as set out in detail previously, the site is also accessible by a number of more sustainable means with further improvement proposed. These are discussed in further detail following.

Rail

As noted, the Luas Red Line is located within close proximity of the subject lands, with the Red Cow Stop approximately 450m northeast and the Kingswood Stop approximately 1km southeast. Exact walking distances from different points within the lands would be subject to a final design layout but a Luas Red Line stop would be expected to be in the region of 450m – 1.5km from any given point given the scale of the lands in question.



Figure 9: Luas Red Cow Stop Relative to Subject Lands

The Luas Red line stop provides access to regular rail services between Tallaght/Saggart and Connolly/the Point Village with intermediate stops including key locations such as Citywest, Abbey Street, Heuston Station, Connolly Station and Busáras. Of particular relevance with respect to a residential development is accessibility to areas of employment, with the Luas Red Line again offering significant potential for the subject lands given its connectivity with Dublin City Centre and other key destinations such as St. James's Hospital, the future National Children's Hospital and the IFSC.

The Red Line also provides linkage with the Luas Green Line which in turn provides rail services between Bride's Glen/Sandyford and Broombridge/Parnell with intermediate stops including key locations such as Sandyford, Dundrum and St. Stephen's Green.

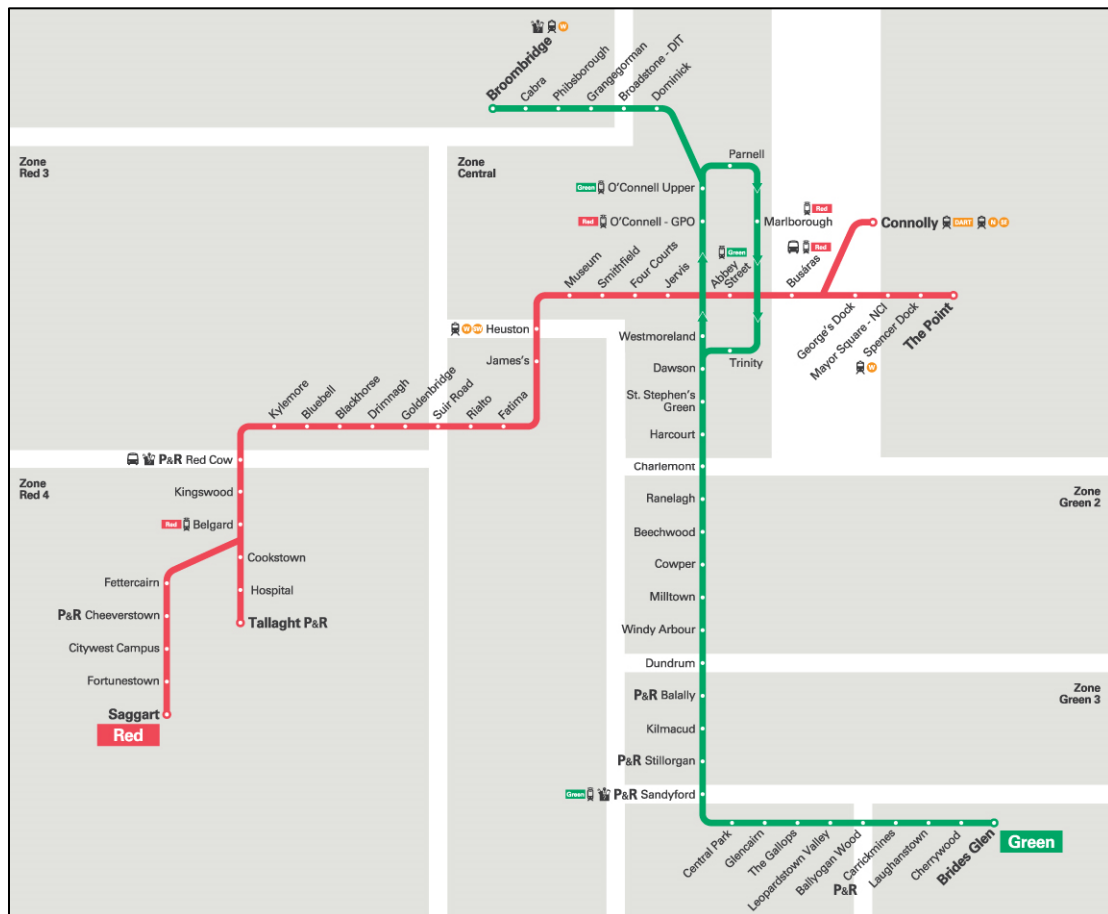


Figure 10: Luas Network Map

The weekday schedule of Red Cow Luas Stop is outlined in the table below showing the typical frequency of service in terms of wait time between trains in minutes, with a similar service available at the Kingswood stop.

Monday - Friday				Saturday				Sunday & Bank Holidays			
	Min	Avg	Max		Min	Avg	Max		Min	Avg	Max
05:42-07:00	4	7	20	06:41-10:00	3	9	20	07:11-12:00	6	12	20
07:00-10:00	3	4	6	10:00-16:00	6	6	7	12:00-19:00	5	9	11
10:00-16:00	4	4	6	16:00-19:00	5	6	10	19:00-23:11	10	11	12
16:00-19:00	4	4	6	19:00-00:11	10	11	15				
19:00-00:12	4	11	15								

Figure 11: Luas Red Cow Stop Service Hours & Frequencies

The proposed development would represent a small fraction of the overall carrying capacity of the Luas and should be easily accommodated by same.

Furthermore, it is noted that the expected changes to work practices as a result of the Covid 19 pandemic will see more people choosing to work from home on a full or part time basis. As a result, there will likely be a reduction in the number of commuters during peak travel times which will further free up capacity on existing public transport services, including the Luas.

The aforementioned connectivity with the Green Line and Heuston and Connolly Stations connects the site to the wider Greater Dublin Area rail network, shown following, as well as Intercity and Commuter services.

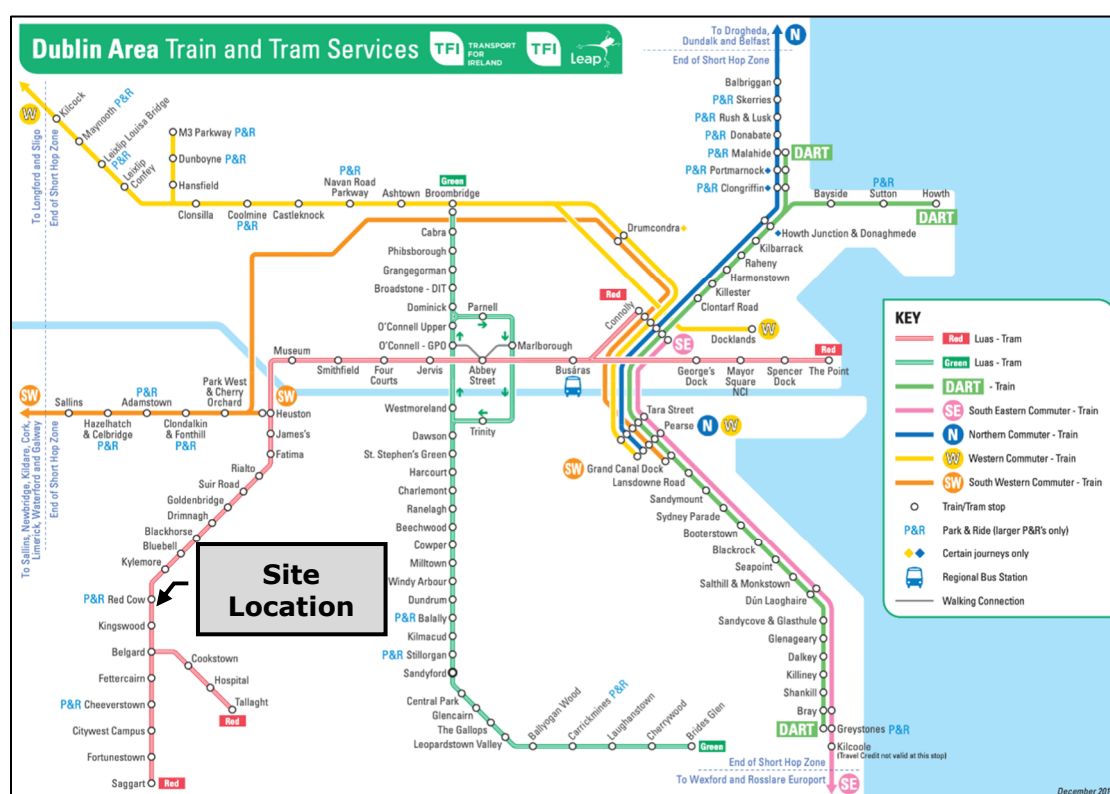


Figure 12: Dublin Rail Network Map

The above will be further enhanced by future projects currently in development including:

- DART+ Programme - consisting of a series of proposals that aim to modernise and improve the existing rail services in the Greater Dublin Area (GDA). It will provide a sustainable, electrified, reliable and more frequent rail service, improving capacity on rail corridors serving Dublin. The current DART network is 50km long, extending from Malahide/

Howth to Greystones. The DART+ programme will increase the length of the DART network to 150km of railway corridor through the electrification and upgrade of existing lines transforming commuter train travel in the Greater Dublin Area (GDA). The DART+ Programme also includes the purchase of new train fleet. The aforementioned connectivity provided by the Luas to Heuston and Connolly Stations will provide a link to these upgraded services which will include routes from Dublin City Centre to:

- Maynooth and M3 Parkway;
- Hazelhatch and Celbridge;
- Drogheda;
- Greystones.
- MetroLink – a high capacity, high-frequency heavy rail line running from Swords to Charlemont, linking Dublin Airport, Irish Rail, DART, Dublin Bus and Luas services, creating fully integrated public transport in the Greater Dublin Area. The project will include a station at O'Connell Street which will again directly link with the Luas Red Line.

Bus

There are a number of bus routes operating in the local area which serve stops within a short walking distance of the subject lands. These stops are highlighted following as per the following extract from mapping made available by Transport for Ireland, with the subject lands indicatively highlighted for clarity.

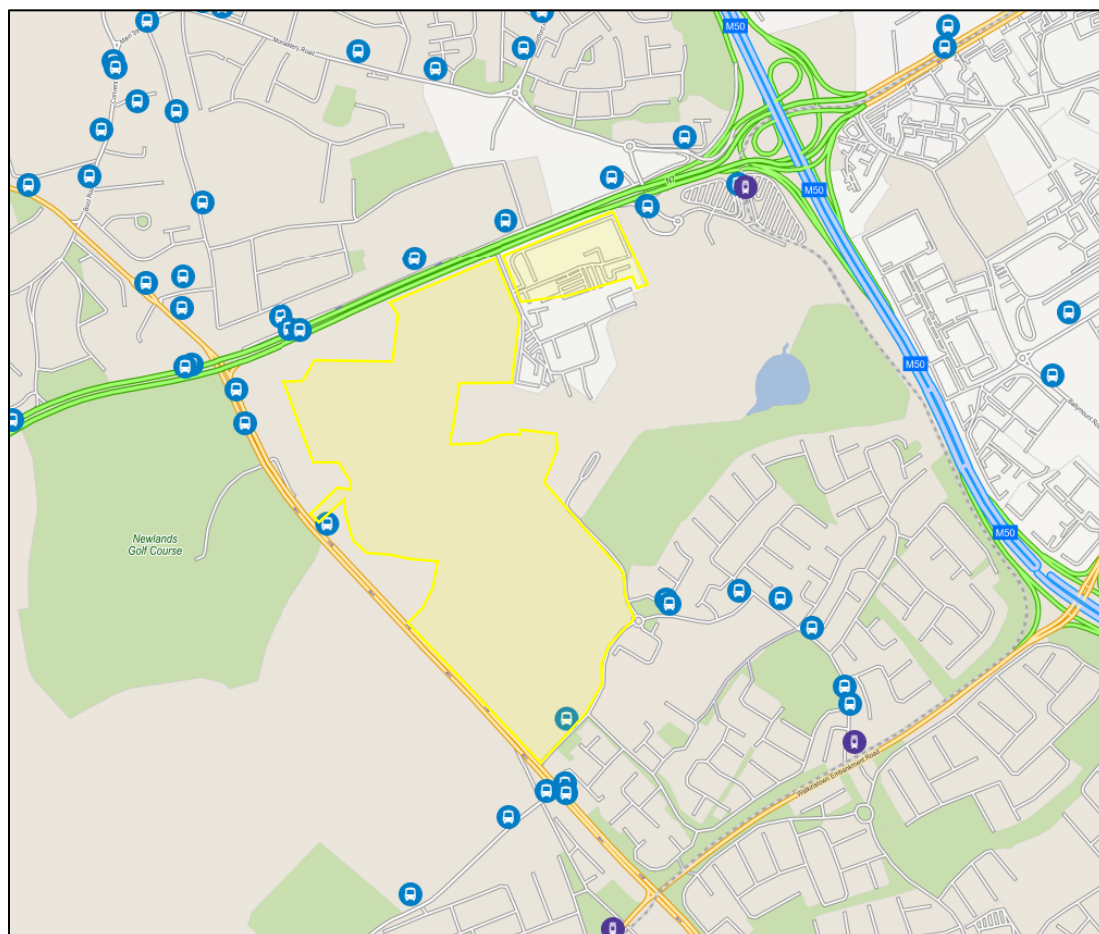


Figure 13: Local Bus Stops

The key local routes serving the bus stops outlined above are summarised following.

Route	Description	Peak Frequency	Off-Peak Frequency
13	Harristown – Grange Castle	10 mins	12-15 mins
56a	Ringsend Rd. – Tallaght	Hourly	Hourly
68	Hawkins St. Towards Newcastle / Greenogue Business Park	Hourly	Hourly
69	Hawkins St. – Rathcoole	Hourly	Hourly
76/a	Tallaght – Chapelizod	20 mins	20 mins

Table 1: Local Dublin Bus Services

The above includes a high frequency service which links directly to Dublin City Centre while the combined local routes offer service to a significant catchment in Dublin.

BusConnects aims to overhaul the current bus system in the Dublin region by building a network of next generation bus corridors on the busiest routes to make bus journeys faster, more predictable and more reliable. It will see a revision to the overall network to increase efficiency and quality of service. An extract of the current network plans as issued in September 2020 is shown following, with the subject lands indicatively highlighted for clarity.



Figure 14: BusConnects Map

The above indicates that the G-Spine Route will operate in close proximity to the development site with peak frequencies of 12 minutes per direction. There will also be a number of orbital routes (W2 – 15 minute peak frequency), radial routes (58 & 60 – hourly peak frequency, 71 – 30 minutes peak frequency) and local routes (L54 – 30 minutes peak frequency, L56 – hourly peak frequency).

Cycle

The existing cycle infrastructure across Dublin was surveyed by the National Transport Authority (NTA) in the preparation of the Greater Dublin Area Cycle Network Plan. The existing facilities in the immediate local area as extracted from this mapping is highlighted following, with the subject lands indicatively highlighted for clarity.



Figure 15: Existing Cycle Infrastructure in Local Area

As can be seen there are cycle lanes and track along section of the main arteries locally including on the N7 and R113 Belgard Road.

The plan also sets out a number of additional cycle infrastructure proposals which focus on improvement and extension of the cycle network across Dublin. The proposals for the local area are shown following.

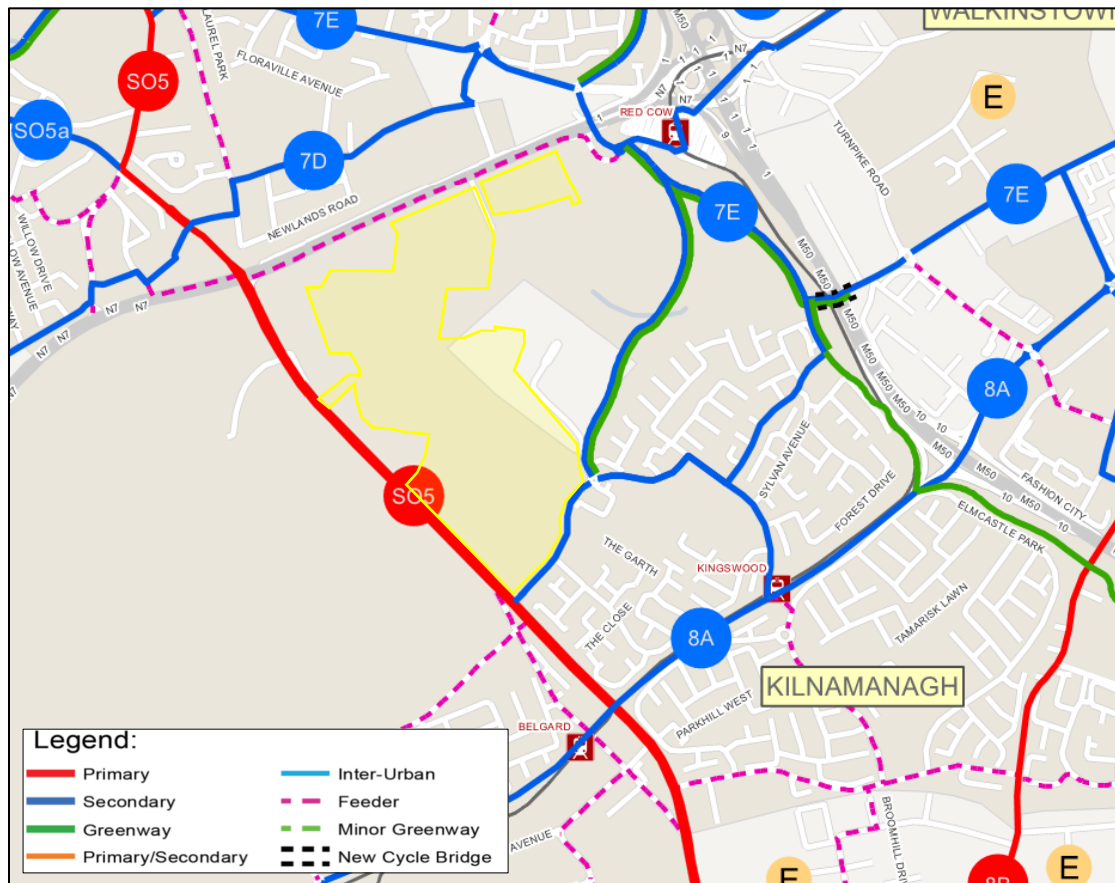


Figure 16: Proposed Future Local Cycle Network

As can be seen there are extensive cycle facilities proposed including both primary, secondary and greenway routes in the immediate vicinity of the development site while will notably improve accessibility by bicycle. These can be further complimented through appropriate design of a development on the subject lands to further improve permeability for the local area, as discussed later in this report.

Pedestrian

As set out previously, there are good quality pedestrian links and crossings with public lighting, on the Belgard Road and N7 in particular, which link the key public transport services outlined above, ensuring appropriate connectivity to same.

Local Amenities

In addition to transportation options, consideration should also be given to the proximity of the site to local services and amenities which residents would typically require access to on a daily basis. Key amongst these is access to retail options, to buy groceries in particular, and educational facilities as well as other amenities such as convenience retail, cafes/bars/restaurants, gyms etc.

Taking the above into consideration, the following is a selectin of some of the key local services and amenities relative to the subject lands:

- There are a variety of supermarkets within close proximity including a Lidl on Cookstown Road (directly opposite the south corner of the subject lands), an Aldi on Old Belgard Road further south and another at Newlands Cross;
- St. Killian's National School and Kingswood Community College are immediately east with further school options available in the wider area including multiple schools in the Tallaght area to the south and the Clondalkin area to the north;
- St. Kevins Killians GAA club is located to the immediate east;
- Newlands Golf Club is located to the immediate west;
- Tallaght Medical Centre is located to the immediate south;
- Kingswood is immediately southeast of the subject lands and provides access to a variety of amenities and services including convenience and other retail, bars/restaurants etc.
- There are a number of gyms and fitness studios to the south along Belgard Road and Old Belgard Road;
- Tallaght is located to the south and connected via the nearby Luas. It offers access to an extensive range of services and amenities including the Square Shopping Centre, banking options, a wide variety of retail options of differing scales and types, healthcare, leisure, cafes, bars, restaurants etc. It is also a major area of employment within close proximity of the subject lands that is easily accessible by means other than car;

- Similarly, Clondalkin is located north of the development site across the N7 and provides access to a similar extensive range of services and amenities as well as areas of employment.

The above are a sample of the day to day locations that a resident would likely need access to but are within appropriate distance to not necessitate the use of a car to access in this instance.

Taking the above into consideration, the overall subject lands have been shown to be well served by high quality public transport infrastructure including both rail and bus options. A number of these services are also classified as high frequency. Crucially, this infrastructure provides direct access from the subject lands to key employment areas locally including Dublin City Centre and Tallaght as well as the wider Greater Dublin transport network. This is very relevant in the context of commuter travel from a residential development and, in this instance, such travel can clearly be accommodated to a significant degree by these sustainable modes. This in turn would avoid a car dependent development and alleviate any potential traffic impact, particularly the N7.

4. LOCAL TRAVEL PATTERNS

In order to establish the travel patterns in the local area, data from the most recent Census in 2016 has been interrogated. The subject lands are located in the Electoral Division of Clondalkin-Ballymount. While the extent of this division does stretch east beyond the M50, the associated lands are considered to be of a similar nature in terms of key transportation characteristics, most notably the Luas.

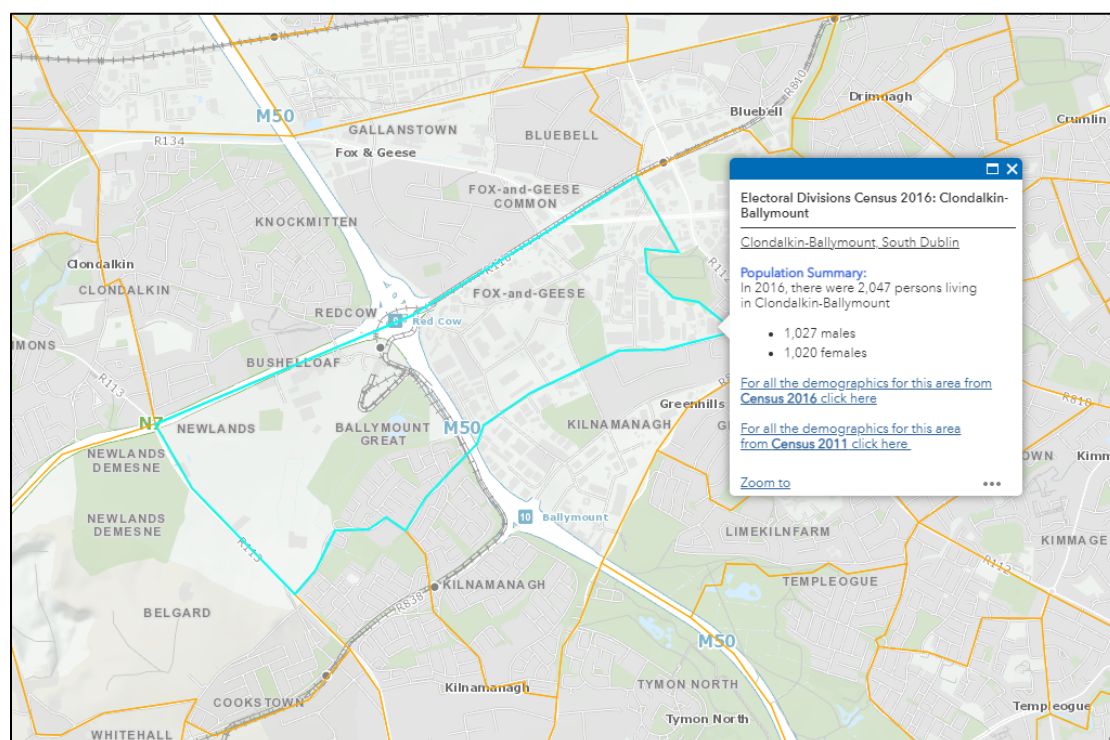


Figure 17: Extent of Electoral Division of Clondalkin-Ballymount

This overall area contains a total of 612 residential units, 587 of which are houses with the remainder recorded as apartments, mobile homes or unclassified. The associated population was 2,047 residents. This is noteworthy as houses tend to have both a higher level of car ownership and usage meaning the associated travel patterns are likely to be conservative in the context of a residential development on the subject lands which would likely be a mix of housing and apartments.

The data shows that 95% of households in this area own at least one car. While this might seem high initially, car ownership does not correlate

exactly with car usage. In many instances, car ownership in Dublin is seen to be for occasional use as opposed to regular use for commuting. This typically means that cars owned remain parked for the majority of time and are infrequently used for bulky shopping or recreational trips.

To establish the level of regular car usage, the data for commuting has been interrogated which shows that just 65% of working residents in this area commute by car, significantly below the car ownership levels. This clearly indicates that there is considerable potential for a reduced level of car ownership at the site and a reduced level of car usage relative to same.

The data further shows that only 15% of working residents use public transport for their commute. This is likely due to the fact that many of the residences in these areas were built at a time where travel by sustainable means was not prioritised and car based travel was the primary focus. IN contrast, new developments seek to incorporate measures to encourage and facilitate travel by more sustainable modes.

Similarly, just 6.5% of working residents travelled by foot or bicycle, this is despite 54% of work/school based trips lasting 30 minutes or less, again signifying the potential for an increase in this modal share.

With respect to students, they experience a notably different modal share as would be expected, with the primary mode of travel being by bus/rail (34%) and the next most popular being walking (32%).

Notwithstanding the above, the subject lands have a clear potential to further prioritise travel by sustainable modes, given the aforementioned accessibility, and achieve a positive modal shift heavily weighted towards sustainable travel. This can be accomplished by a series of sustainable transport measures incorporated into any design which will further facilitate and encourage this positive modal shift, as discussed later in this report.

5. POTENTIAL ACCESS, ROAD DESIGN & TRAFFIC IMPACT

Potential Access Options

As noted previously, the site enjoys frontage on a number of public roads with existing entrances on the N7 and Ballymount Road.

With respect to the main parcel of land, the optimal entrance location would be from the R113 Belgard Road via a new signalised junction. This could potentially be situated at the entrance to Belgard Castle to offer an improvement to the existing access configuration at this location. The provision of a signalised junction would allow traffic flow to be co-ordinated with the adjacent signalised junctions and controlled to ensure the integrity of the public road network and its associated carrying capacity is maintained.

In the instance that the subject lands are zoned accordingly and a design for a residential development is progressed, it is recommended that the minor existing entrances on the N7 be removed to protect the integrity of the N7 as a critical part of the national road infrastructure and offer a benefit to same. This is on the basis of the existing 80kph speed limit along this section and in line with the *Spatial Planning and National Roads – Guidelines for Planning Authorities*, with the following extract from the latter particularly relevant.

Lands adjoining National Roads to which speed limits greater than 60 kmh apply:
The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.

Figure 18: Extract from Spatial Planning and National Roads Guidelines

With respect to the smaller parcel of land, the access options are notably more limited given the associated boundaries. On this basis, the existing access road served by the left-in/left out N7 junction is the optimal entrance

location. It is stressed that as this is a junction and not a site access, it is not considered to fall under the above requirement with respect to accesses on national roads.

Nevertheless, consideration can be given to the trip generation potential of any development on these lands relative to the existing industrial use to minimise/avoid any potential traffic increase should it be deemed necessary through consultation with the Local Authority and Transport Infrastructure Ireland (TII).

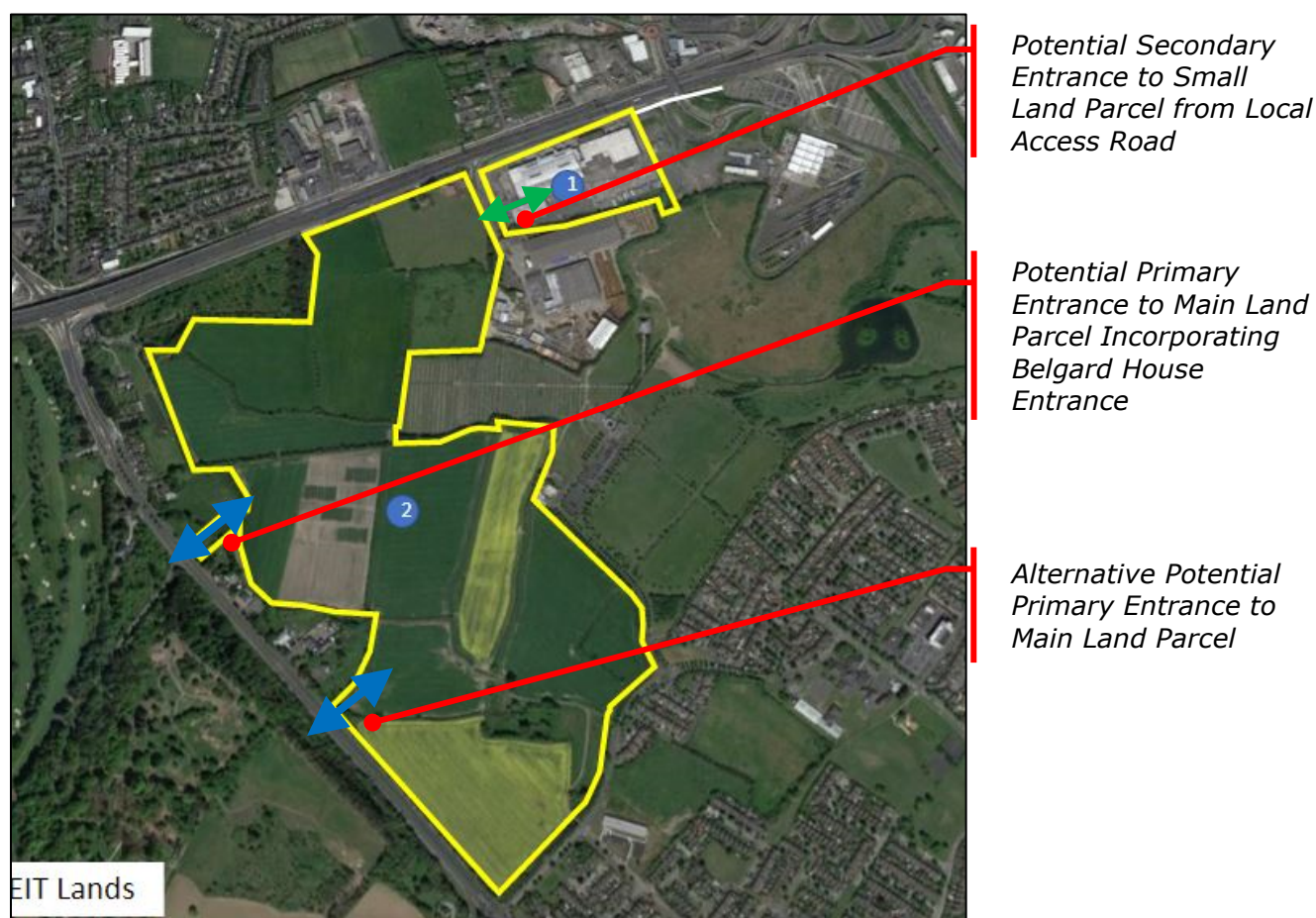


Figure 19: Potential Vehicle Entrances

All junctions would be designed in accordance with the standards set out in the Design Manual for Urban roads and Streets (DMURS) and the Design Manual for Roads and Bridges (DMRB) as appropriate. This would include particular focus on achieving the required sightlines and incorporating appropriate turning radii, pedestrian crossing facilities etc.

With respect to pedestrian and cycle permeability, any development design should seek to incorporate same wherever possible, with additional consideration also given to the standards set out in the National Cycle Manual. Permeability should focus on facilitating desire lines, particularly to local public transport options, services and amenities in line with the core principles of DMURS. This would also provide additional benefit to the wider community.

Internal Road Design

Any development internal roads would be designed in accordance with DMURS, with specific consideration given to the sections including:

- Section 4.3.1 Footways, Verges and Strips;
- Section 4.3.2 Pedestrian Crossings;
- Section 4.3.3 Corner Radii;
- Section 4.3.5 Cycle Facilities;
- Section 4.4.1 Carriageway Widths;
- Section 4.4.2 Carriageway Surfaces;
- Section 4.4.3 Junction Design;
- Section 4.4.4 Forward Visibility;
- Section 4.4.9 On-Street Parking and Loading.

Traffic Impact

Any development proposals at the site would be subject to detailed analysis with respect to traffic impact potential to ensure the operation of the local road network is not unduly impacted. This is particularly critical in the context of the N7 which is a key link in the national road infrastructure.

Any such assessment would be carried out in accordance with the TII *Traffic & Transport Assessment Guidelines* and be based on a scope agreed with the Local Authority and TII as appropriate. Key elements of the assessment would include:

- Procurement of up-to-date and accurate traffic survey data on the local road network including junction turning counts, automatic traffic counters, speed surveys etc.
- Preparation of a series of traffic network models, calibrated and validated against base surveyed data;
- Use of appropriate growth factors such as those contained within the *Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections*;
- Consideration of appropriate future year scenarios that assess both the Do Nothing and Do Something cases (i.e. with and without development) to allow any true impact to be identified;
- Identification of mitigation measures required, if any.

The traffic analysis would also inform the road design, particularly any proposed entrances on public roads, as part of an iterative process to establish the optimal layout for same. Consideration of the impact on adjacent junctions would also be required.

In the context of the capacity of the local roads, the lasting impact of the Covid 19 impact should be given due consideration. The associated restrictions which were put in place on a national basis for much of 2020 and 2021 have placed an unavoidable focus on working from home which has ultimately been proven to be a more viable and compatible option for many industries than would previously have been thought. On this basis, working from home is expected to be a more common occurrence for many workers on a full or even part time basis. This in turn has a clear implication for traffic volumes as the need to travel is significantly reduced, particularly during peak commuting hours.

The National Transport Authority (NTA) has acknowledged this likelihood in a recently circulated note titled "Alternative Future Scenario for Travel Demand" dated November 2020 where it defines the Covid 19 pandemic as a "shock wave" event which "can lead to an acceleration in the natural rate of change in society". The note concludes that the total number of daily trips could be up to 8% lower than previous projections. This reduction in

traffic is expected to result in additional reserve capacity for the local road network, in particular the N7 which previously catered for a notable degree of commuting traffic and in turn naturally mitigate any potential impact from a development on the subject lands.

6. DESIGN MEASURES TO FACILITATE SUSTAINABLE TRAVEL

The accessible nature of the site, particularly its proximity to the Luas Red Line, presents a clear opportunity to create a positive modal share at any residential development on the subject lands heavily weighted towards sustainable travel. Examples of measures that could be incorporated include:

- Reduction of parking provision based on the guidance in the *Sustainable Urban Housing: Design Standards for New Apartments* and the standards set out in the South Dublin County Council Development Plan based on the highly accessible nature of the site and the Census data indicating a reduced need for regular travel by car;
- Provision of high quality cycle facilities including parking provision in excess of the Development Plan standards and incorporating facilities for alternative bicycles including electric bikes and cargo bikes which can facilitate longer trips and trips that require more carrying capacity;
- Prioritising pedestrian and cycle permeability as part of the overall design layout, particularly with respect to locate public transport options, amenities and services to reduce the need to drive;
- Provision of car club bases within the lands to facilitate demand for occasional access to a vehicle without the need to own and store one on site and reduce the potential for car based commuting;
- Provision of bases for cycle rental schemes at key locations along with cycle repair facilities;
- Provision of adequate neighbourhood facilities including childcare and convenience retail options;
- Include adequate provision for servicing and deliveries to reduce the need to travel for bulky shopping trips;
- Include facilities for work from home or work hubs to minimise the need to commute;
- Preparation and implementation of a site specific Mobility Management Plan with the core objective of encouraging and facilitating travel by sustainable means and reducing the need to travel. This plan would

include both hard and soft measures and be continually updated in line with the experience of its operation.

The above measures are an example of some that could be incorporated into a residential development on the subject lands to help minimise any vehicle trip generation potential in line with national and local objectives to prioritise movement by sustainable means. This in turn would further reduce the potential impact on the operation of the local road network.

7. SUMMARY & CONCLUSIONS

The subject lands are located in close proximity to a number of high quality and high frequency public transport services, most notably the Luas Red Line which in turn links with the overall Greater Dublin transport network. This level accessibility means the site is suitable for development as a residential use as the associated commuting needs can be facilitated by sustainable means with additional measures to support working from home also possible.

There are also a wide variety of local amenities and services within a short distance of the subject lands which further reduce the need to travel by car.

Local Census data in the area has indicated notable potential for a positive modal shift towards sustainable modes which can be facilitated by a number of measures incorporated into the design of a residential development on the subject lands, in line with national and local objectives.

There are a number of potential access options for a residential development on the lands which would not impact on the operation of the national road network in particular, in line with the relevant guidance. The design could further incorporate measures to maximise permeability to the benefit of the wider community. All road design would be in accordance with the relevant standards including DMURS, the DMRB and the National Cycle Manual.

Nevertheless, any potential development would be subject to a comprehensive traffic assessment in line with TII guidance which would inform the associated road design and mitigation measures if any, required.

Patrick Raggett B.E., CEng MIEI, MCIHT
Chartered Civil Engineer
O'Connor Sutton Cronin & Associates



Appendix C: MEP Utility Assessment Report by OCSC Consulting Engineers

MEP Utility Assessment Report

**Lands at Newlands Cross
For Hibernia REIT**

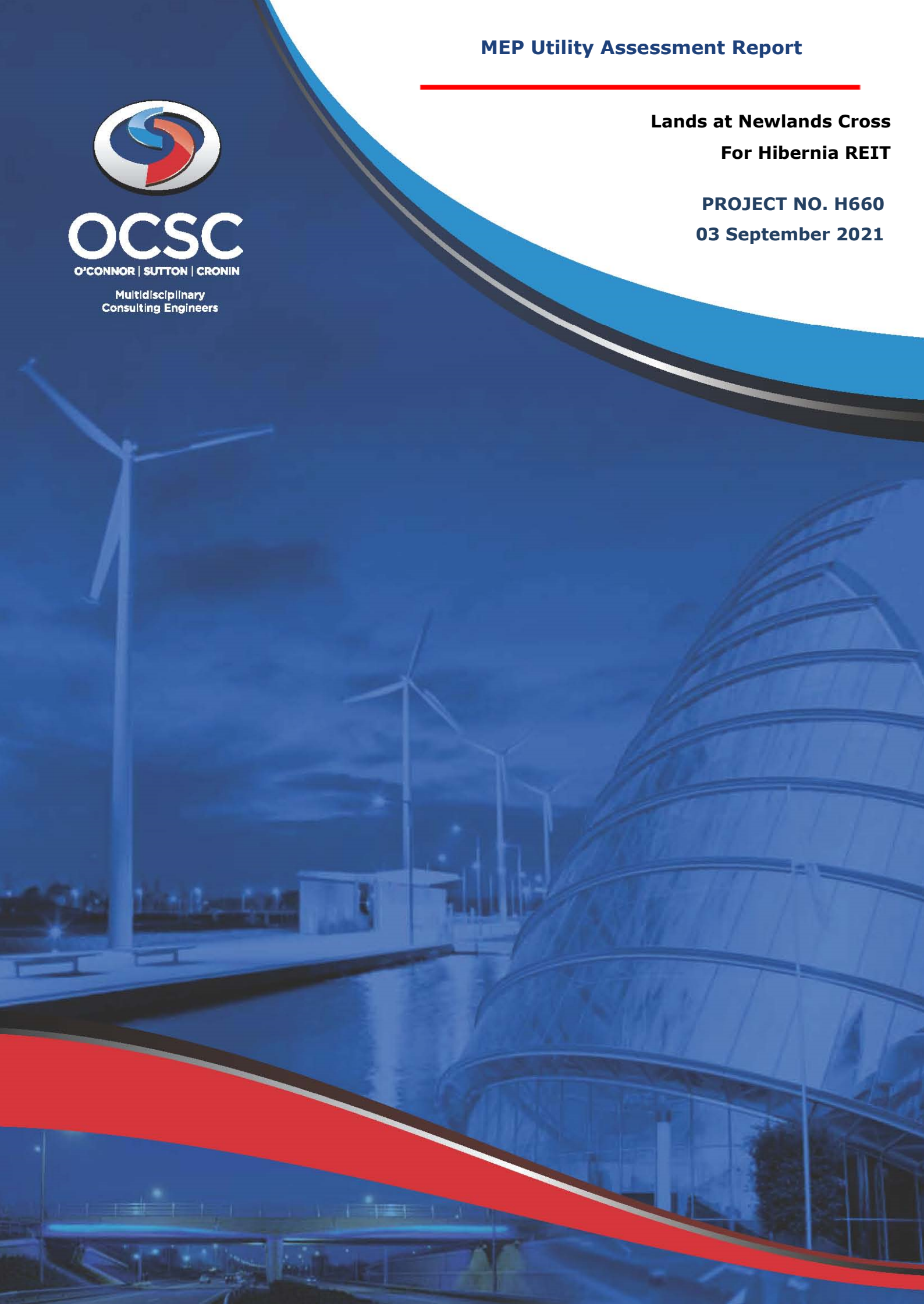
**PROJECT NO. H660
03 September 2021**



OCSC

O'CONNOR | SUTTON | CRONIN

Multidisciplinary
Consulting Engineers



MEP Utility Assessment Report

**Lands at Newlands Cross
for Hibernia REIT**

**PROJECT NO. H660
3 September 2021**

MEP Utility Assessment Report

for

Lands at Newlands Cross,

South County Dublin.



OCSC

O'CONNOR | SUTTON | CRONIN

Multidisciplinary
Consulting Engineers

NOTICE

This document has been produced by O'Connor Sutton Cronin & Associates for its client, *Hibernia REIT*. It may not be used for any purpose other than that specified by any other person without the written permission of the authors.



DOCUMENT CONTROL & HISTORY

OCSC Job No.: H660	Project Code	Originator	Zone Volume	Level	File Type	Role Type	Number	Status / Suitability Code	Revision
	H660	OCSC	XX	XX	RP	C	0001	S2	P01
Rev.	Status	Authors	Checked	Authorised	Issue Date				
P01	S2	NB	EP	DB	03.09.2021				

MEP Utility Assessment Report

TABLE OF CONTENTS

PAGE

1 INTRODUCTION	1
1.1 Appointment.....	1
1.2 Scope of Report.....	1
1.3 Site Location and Context	1
2 ESB ELECTRICAL SERVICES	2
2.1 Existing ESB Services.....	2
2.2 Proposed Development	2
3 NATURAL GAS 4	
3.1 Existing Gas Networks Ireland Infrastructure.....	4
3.2 Proposed Development	4
4 TELECOM SERVICES	5
4.3 Existing Telecom Infrastructure	5
4.4 Proposed Development	5
5 SUSTAINABLE ENERGY INITIATIVES	6
5.1 Overview	6
5.2 Air Source Heat Pumps	6
5.3 Solar Photovoltaics.....	7
5.4 VRF Heat Pumps.....	7
6 CONCLUSION 8	

1 INTRODUCTION

1.1 Appointment

O'Connor Sutton Cronin & Associates (OCSC) have been appointed by *Hibernia REIT* to assess the suitability of existing utility infrastructure in the vicinity of subject lands that are outlined in the main body of this report.

1.2 Scope of Report

This report outlines how the proposed potential development site can be serviced by MEP utility services, namely; Electrical Power, Natural Gas, Telecom Services and an overview of suggested Sustainable Energy initiatives that will be explored as part of the masterplan development.

The report was prepared by reviewing the available data from the utility providers current network maps and based on discussions with utility company representatives.

1.3 Site Location and Context

The subject lands are located just west southwest from the N7 Red Cow / M50 junction (Junction 7), and comprises approximately 58-ha total.



Figure 1.1 – HREIT Subject Lands

2 ESB ELECTRICAL SERVICES

2.1 Existing ESB Services

There is an existing network of underground MV/LV (Medium/Low Voltage), overhead MV, and overhead LV surrounding the site. The overhead MV rises from below ground to high level at Ballymount Road and traverses to the Belgard Road where it drops back to the below ground network. The underground MV/LV lines run along the Belgard Road and also serve the Kingswood area. There are a series of overhead LV lines servicing various premises along the Belgard Road and the N7.

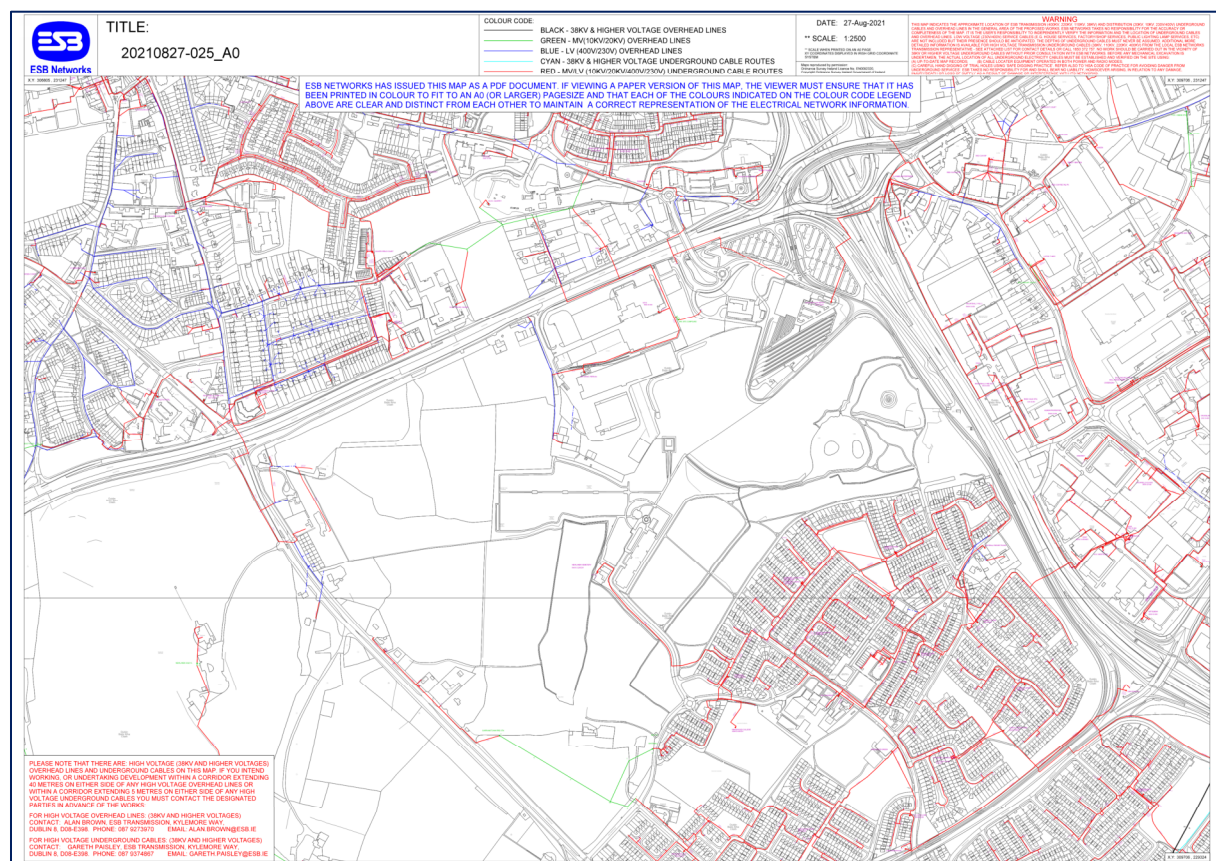


Figure 2.1 – Existing ESB Network Map

2.2 Proposed Development

The proposed development will be a combination of mixed use primarily residential @ approximately 3,400 units and a variety of other uses such as

Hotels, Offices, Healthcare Centres, Schools, Creche, Sports Facilities, Retail and F&B outlets.

The proposed development will be provided with a number of new ESB MV substations situated at strategic locations throughout the development. These substations will be serviced via the below ground MV network, this MV network will be extended around the development in a ring main fashion in accordance with ESB standards. The ESB will be required to extend their local infrastructure to service the development and this is typically carried out by the ESB upon receipt of a formal application.

There will most likely be a requirement to divert overhead MV and LV lines to below ground. This would not be unusual for a development of this scale and it can be carried out by ESB Networks upon receipt of an NW1 main line diversion application.

3 NATURAL GAS

3.1 Existing Gas Networks Ireland Infrastructure

The existing site has a high pressure transmission main traversing the N7 and in addition there is an extensive network of medium pressure and low pressure gas distribution in the area and in particular on the Belgard Road.

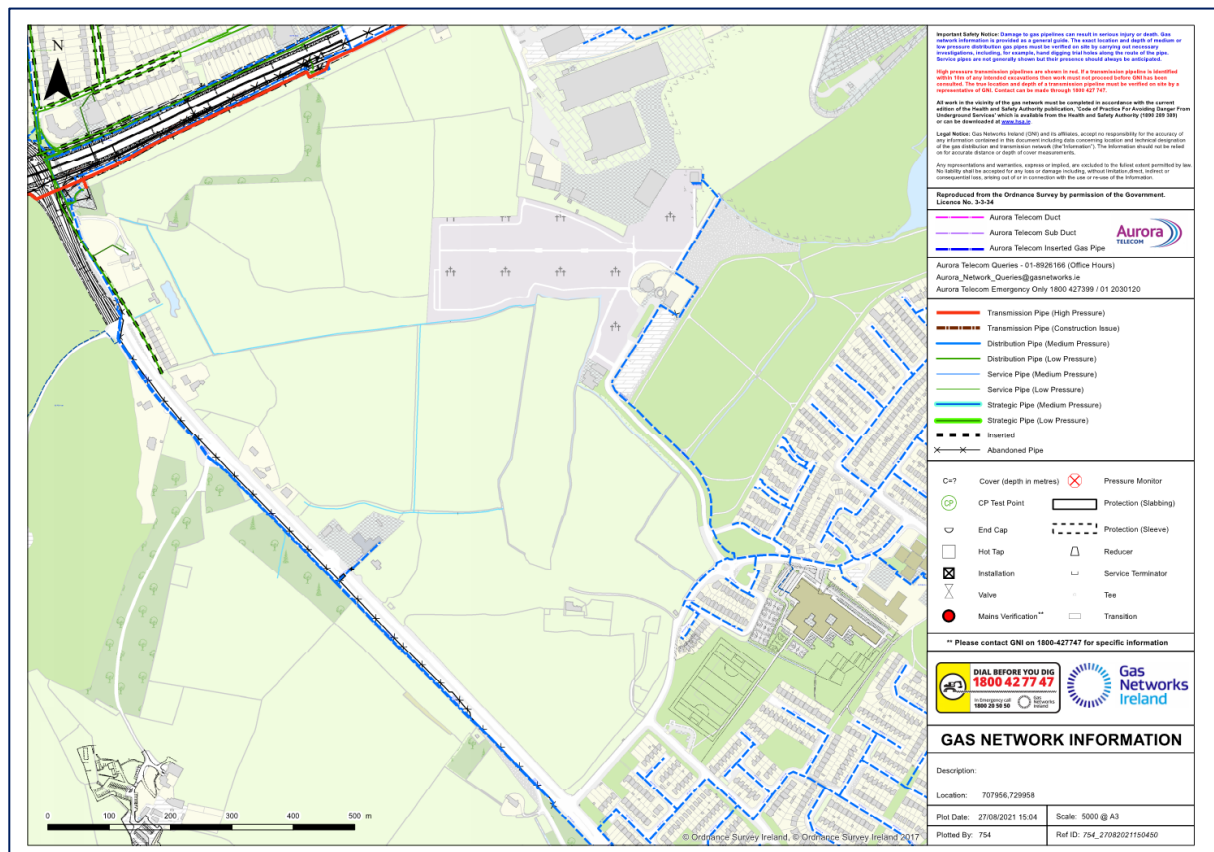


Figure 3.1 - Existing GNI Infrastructure

3.2 Proposed Development

A new connection from the existing medium pressure 4 bar gas main will be required to serve the development. GNI (Gas Networks Ireland) will extend this infrastructure into the development from the optimum location to serve the development upon receipt of an application and meters will be installed at each premises.

4 TELECOM SERVICES

4.3 Existing Telecom Infrastructure

There are number of telecom providers in the area such as Virign Media, Eir, and BT. These exisitng services consist of a combination of fibre, broadband, TV, and phonline services.

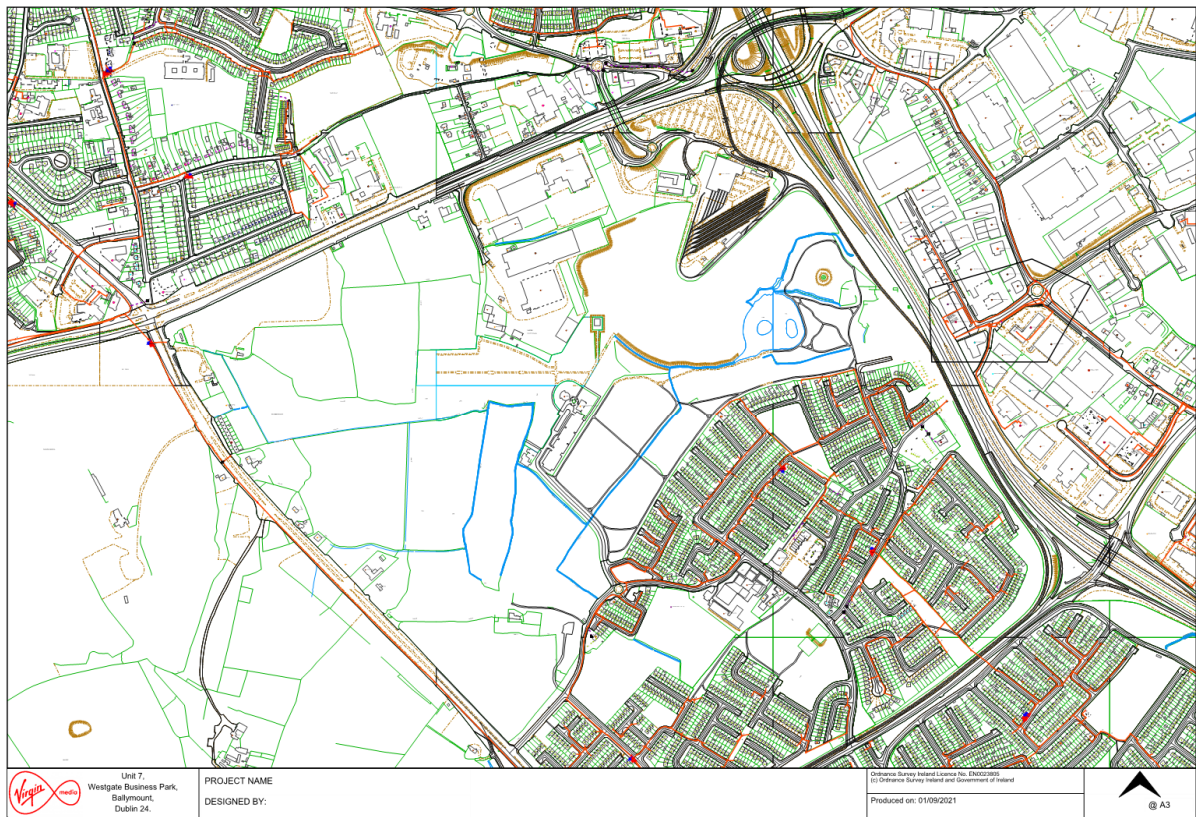


Figure 4.1 - Existing Virgin Media Infrastructure

4.4 Proposed Development

There are multiple different service providers in the area and the new development can avail of these services as and when required. New connections to premises are typically made upon receipt of an application based on the type of service providers.

5 SUSTAINABLE ENERGY INITIATIVES

5.1 Overview

The purpose of this section is to provide a brief overview of the type of renewable energy services Hibernia REIT will investigate as part of the design development and the most optimum systems will be implemented on a fit for purpose basis.

5.2 Air Source Heat Pumps

Air source heat pumps convert energy from the air to provide heat and hot water for buildings. They are powered by electricity and are highly efficient. The air source heat pump is located outside in the open air and it uses a fan to draw air across it. This air then flows over a heat exchanger, which contains a refrigerant liquid. An evaporator uses the latent heat from the air to heat the refrigerant sufficiently until it boils and turns to a gas. This gas is then compressed which causes a significant rise in temperature. An additional heat exchanger removes the heat from the refrigerant which can then be used as useful heat within the building.

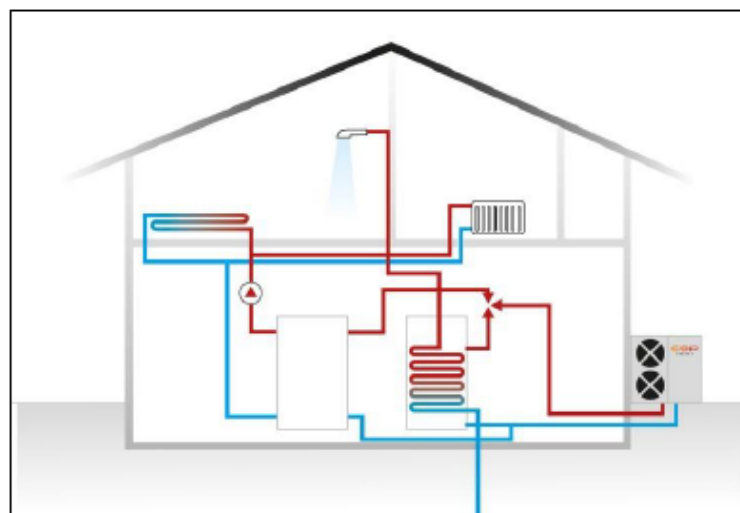


Figure 5.1 - Air-Source Heat Pump Diagram

5.3 Solar Photovoltaics

Photovoltaic (PV) Panels convert the solar radiation into electricity, which can be connected to the mains supply of a building. The panels are placed on the roof and are most efficient with an incline angle of 30°. Panels are typically arranged in arrays on building roofs, with the produced electricity fed either directly into the landlord's supply.

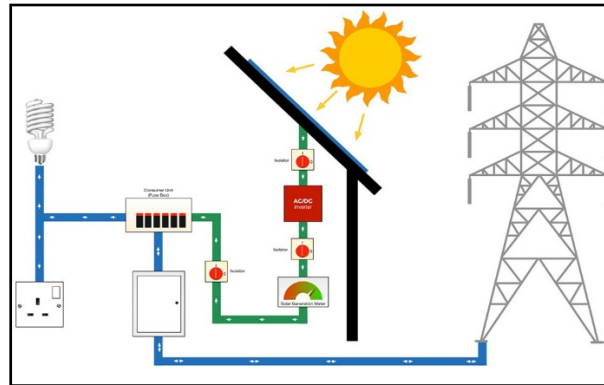


Figure 5.2 - Solar PV Diagram

5.4 VRF Heat Pumps

Variable Refrigerant Flow systems utilise heat pumps in order to provide space heating as well as space cooling. These systems are capable of serving multiple zones with different heating and cooling requirements and they can modulate their output according to zone requirements, increasing system efficiencies and reducing the energy demand of these systems.

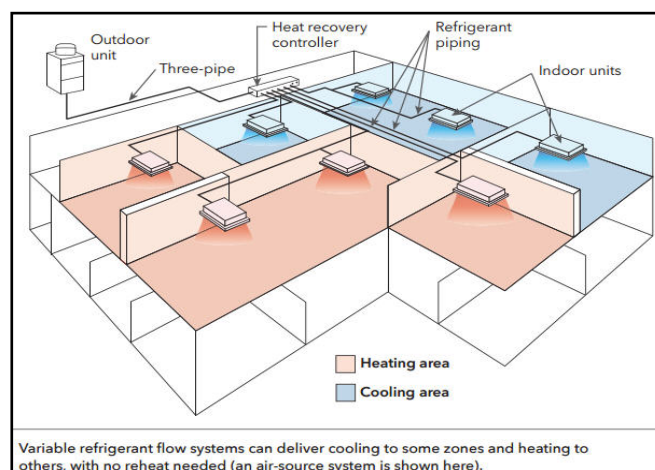


Figure 5.3 - Typical VRF Schematic Diagram

6 CONCLUSION

We have carried out our investigation and assessment of the utility infrastructure with respect to the proposed development and the outcome of this assessment has demonstrated that the development is extensively serviced by existing utility infrastructure services such as ESB, Natural Gas, and Telecom Services. As with all new developments, it will require detailed discussions with utility companies to determine the optimum route into the site for new services.

We have all also demonstrated at a high level HREIT's commitment to sustainability via the implementation of renewable energy systems on the proposed site.



Appendix D: Interpreting the Core Strategy and Housing Need Assessment by Hendrik van der Kamp

Interpreting the Core Strategy and Housing Need Assessment – Are Sufficient Lands Zoned?

REVISED DRAFT

1 Introduction

This section of the submission to the draft development plan considers the question whether the core strategy in the development plan has made sufficient provision for residential development during the lifetime of the development plan. Such provision is in the form of zoned lands in particular the lands earmarked for new residential development, lands with zoning objective RES-N: To provide for new residential communities in accordance with approved area plans.

The analysis that is presented here addresses four questions, all of which are related to the overall amount of land needed for residential development during the lifetime of the development plan:

- **Question One: Will All of the Zoned Lands Be Developed?**
- **Question Two: Is Headroom Provision Sufficient?**
- **Question Three: Are the Population Projections Correct?**
- **Question Four: Is the Household Size Figure Realistic?**

2 Question One: Will All of the Zoned Lands Be Developed?

In relation to the core strategy, the recently published draft guidelines on Development Plan preparation state the importance for development plans to : ...”*Provide detailed analysis of existing and proposed land use zonings, with a particular focus on residential development.*”¹

It is an established reality that the zoning of land in a development plan or Local Area Plan does not guarantee that development will take place. As a result of a number of factors, not all lands zoned for the six year period of the development plan may be developed or are even likely to be developed. For that reason, planning authorities generally assume a degree of ‘overzoning’ in order to provide sufficient flexibility during the lifetime of the development plan.

Analysis of the zoned lands in the draft development plan shows that a large proportion of the lands that have been zoned for new residential development, were also zoned in previous development plans but were not developed. The draft development plan does not indicate the reasons for this and does not provide any information why the lands are likely to be developed during the forthcoming six years when they were not developed up to now, during a period of up to 20 years or more.

The core strategy of the draft development plan notes that there is 477 ha of zoned land excluding SDZ's and long term strategic lands with the potential to accommodate 23,730 dwelling units.² This includes a combination of Tier 1 lands (i.e. zoned land that is serviced: 196 has) and Tier 2 lands (i.e. zoned land that is serviceable within the life of the plan: 281 has).³ However, an analysis of the larger portions of RES-N zoned lands reveals that many of

¹ *Development Plan Guidelines for Planning Authorities*, August 2021, p. 51.

² *South Dublin Draft County Development Plan 2022-2028*, p. 15.

³ *South Dublin Draft County Development Plan 2022-2028*, p. 36.

these were zoned in previous development plans going back as far as 2004. See table 1. From this analysis it would appear that at least half of the zoned lands have been zoned for periods of 16 years or longer but were not developed.

Location	Area in hectares	Zoning Objective	Zoned Since	Current Status
Rathcoole	14.6	RES-N	2004	Undeveloped
Citywest	30.5	RES-N	2004	Undeveloped
Killinarden	22.4	RES-N	2004	Undeveloped
Ballycullen	90.0	RES-N	2004	Partially Developed
Newcastle	41.0	RES-N	2004	Undeveloped
Ballyboden/ Edmondstown	43.3	Existing Residential	2004	Undeveloped
Total	241.8			

Table 1 – Zoned Legacy Lands. (See for more detailed information Appendix A.)

The recently published draft development plan guidelines suggest that the following approach should be adopted in the situation where zoned lands have not been developed through several development plan cycles: *...“in cases where land is zoned and has remained undeveloped and unserviced through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective (See Appendix A).”*⁴

The answer to the question: ‘Will all of the zoned lands be developed?’ must clearly be negative. If a large proportion of the lands zoned in the 2004 county development were not developed in the lifetime of that development plan, nor during the lifetime of the two subsequent plans, it is likely that at least some of these lands will remain undeveloped even if their zoning is confirmed in the draft plan.

3 Question Two: Is Headroom Provision Sufficient?

Paragraph 4.14 of the 2007 Development Plan Guidelines for Planning Authorities, states that planning authorities should generally make provision for 50% more zoned land than is required to meet demand during the six-year lifetime of a Development Plan i.e. sufficient land for a further three years.⁵ This is known as ‘headroom’. However, this guidance was superseded by the Implementation Roadmap which reduced the headroom percentage from 50% to 25% as it states the following:

*...“Scope for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow.”*⁶

⁴ Development Plan Guidelines for Planning Authorities, August 2021, p. 54.

⁵ paragraph 4.14 of the 2007 Development Plan Guidelines for Planning Authorities.

⁶ Implementation Roadmap for the National Planning Framework, Govt. of Ireland, July 2018, p. 5.

With the recent publication of the draft Development Plan Guidelines, this paragraph of the Implementation Roadmap appears to be superseded by the Draft Development Plan Guidelines which do not use the term 'headroom' and instead refer to 'additional provision'. The Guidelines state the following:

*..."There is no automatic presumption of Additional Provision land or sites to meet housing supply targets in any development plan. The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period."*⁷

It would appear therefore that planning authorities are no longer advised to provide an additional three years supply of zoned land beyond the six year lifetime of the development plan (50%) but instead adopt a targeted approach for each settlement with a maximum of 25% of the actual amount of zoned land that is required.

While the Guidelines are still in draft form, it would appear that this provision will reduce flexibility in the provision of zoned land to an extent that there is a risk of a shortfall of development during the lifetime of the development plan. The reasons for this are twofold: (i) the fact that not all zoned land will be developed (as is clearly the case in South Dublin as shown in the previous paragraph) and (ii) the fact that development plans often 'overrun' their plan period which means that the six years may have lapsed before a new plan is operational.

Notwithstanding restrictive national guidelines in relation to 'headroom provision' the answer to the question: 'Is headroom provision sufficient?' is negative which may result in a shortfall of available zoned land during the lifetime of the development plan.

4 Question Three: Are the Population Projections Correct?

Under the National Planning Framework that was adopted in February 2018 max. 50% of population growth during the plan period up to 2040 should be accommodated in the Eastern and Midland Region.⁸

The Implementation Roadmap that was published later in the year (in July 2018) confirmed the national average baseline projection for the period to 2040 as 1.1million people over 2016 Census figures. Appendix 2 of that document includes population projections up to 2031 for the regions and counties. These projections, known as transitional projections, confirm the NPF objective that the proportion of the national population growth that would be accommodated in the Eastern and Midlands Region should be at most 50% of national population growth. In fact, the projections assume figures that are below 50% for the Eastern and Midlands Region: 46% for the low figure in the population projection range and 45% for the high figure in the range.⁹ (See for more detail appendix B.)

The relevance of the NPF and the Implementation Roadmap as a basis for population projections at county level is confirmed in the recently published draft guidelines for

⁷ *Development Plan Guidelines for Planning Authorities*, August 2021, p. 55.

⁸ *Project Ireland 2040 - National Planning Framework*, Government of Ireland 2018, NPO 1a.

⁹ *Implementation Roadmap for the National Planning Framework*, Govt. of Ireland, July 2018, Appendix 2, p. 13.

development plans where it is stated: ...*"The National Planning Framework (NPF) and associated NPF Roadmap 2018¹⁴ document provide overall strategic projected population target ranges for each local authority area."*¹⁰

The question is: "are these assumptions regarding national distribution of population growth up to 2031 across the country realistic?" It would appear that they are not. Statistics published by the Census on planning permissions show that in the period 2018 up to the first quarter of 2021, only 40% of dwelling units that were granted planning permission during that period, were located outside the Eastern and Midland Region. The remainder (59.4%) were located in the Eastern and Midlands Region. If 2018 is excluded, the figures show that the proportion of all dwelling units granted planning permission that were outside the EMRA region was even less (39%) with the remainder (61%) within the EMRA region. In other words, a move away from the objectives of the NPF rather than *towards* them. See Table 2a below.

These trends are even more pronounced if the planning permissions for schemes of minimum 100 dwelling units are considered. During this period of analysis almost all such permissions were granted by An Bord Pleanála under the provisions of Strategic Housing Developments. The statistics of the units granted under SHD permissions are therefore of interest. Table 2b illustrates the breakdown across the regions of the units granted under SHD permissions. Again, the figures illustrate the same picture: the national distribution of dwelling units granted permission is different from the National Planning Framework policy objectives and the trend is away from the NPF rather than towards it.

What this divergence between policy ambitions and real housing need means in practical terms can be illustrated as follows. If a 60/40 split is assumed (i.e. 60% of dwelling units in the EMRA regions with 40% outside it) instead of the 45/55 split under the Implementation Roadmap, the population projection for the EMRA region should be adjusted upwards by 100,000 people. See appendix B.

The overall conclusion in relation to the question: 'Are the population projections correct?' is that the population projections up to 2031 under the Roadmap document are too low and underestimate the reality of growth of development in the EMRA region.

¹⁰ *Development Plan Guidelines for Planning Authorities*, August 2021, p. 51.

Region	All Dwelling Units	
Q1 2019 – Q1 2021	Total	% Total
State	134,886	100%
Northern and Western	14,834	11%
Southern	37,565	28%
Eastern and Midland	82,487	61%
Q1 2018 – Q1 2021	Total	% Total
State	183,952	100%
Northern and Western	20,692	11%
Southern	54,006	29%
Eastern and Midland	109,254	59%

Table 2a – Dwelling Units Granted Planning Permissions (source: CSO)

Region	Dwelling Units Granted Under SHD Permissions	
Q1 2019 – Q1 2021	Total	% Total
State	46,306	100%
Northern and Western	1,062	2%
Southern	4,720	10%
Eastern and Midland	40,524	88%
Q1 2018 – Q1 2021	Total	% Total
State	53,950	100%
Northern and Western	1,387	3%
Southern	6,064	11%
Eastern and Midland	46,499	86%

Table 2b – Dwelling Units Granted Planning Permissions in SHD Permissions (source: www.pleanala.ie)

5 Question Four: Is the Household Size Figure Realistic?

The draft development plan states the following in relation to the assumed change in household size during the lifetime of the new development plan:

...“By 2028, with a total population of 325,285 persons and a total housing stock of 118,632 houses, the household size will be an average of 2.74 per house. This is a reduction from the 2.99 in 2016 and is consistent with the downward national trend of household size, from 2.75 in 2016 to 2.5 in 2040, outlined under the National Planning Framework.”¹¹

Statutory guidelines for incorporating housing supply targets into development plans were issued under Section 28 of the Planning Act in 2020.¹² These guidelines use the ESRI report

¹¹ *South Dublin Draft County Development Plan 2022-2028*, p. 29.

¹² *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities*, DHLGH, December 2020 (or the 'HST Guidelines').

as a basis.¹³ However, the household size assumptions that are adopted in the ESRI report have been criticised in a recent report by Prof. Ronan Lyons: ...*"Finally, and most crucially in explaining their unusually low estimate of housing need, they assume that household size stays at 2016 levels. By so doing, they eliminate one of the largest likely sources of housing need."*¹⁴

The report by Prof. Lyons suggests that a decline of the average household size to 2.3 or below that figure by 2050 is a realistic assumption.¹⁵ It concludes that the Housing Need Demand Assessment adopts an average household size of 2.67 in Ireland as late as 2040, ...*"even though existing demographics in 2016 already implied a true household size of between 2.4 and 2.45."*¹⁶

For a target population in the county of 325,285 in 2028¹⁷ a difference in household size between the adopted 2.74 in the draft development plan and the suggested 2.4 figure or less as advised elsewhere, would result in a difference of 16,818 houses needed for the county population. At a gross density of 35 dwellings per hectare this would mean the need for an additional 480 hectares, equivalent to the entire amount of land zoned in the current draft development plan (exc. SDZs and long term strategic lands).

The answer to the question: 'Is the Household Size figure realistic?' must also be negative. If a more realistic household size figure of 2.4 is assumed, the amount of zoned land that is need would be twice the amount that is provided for in the draft plan.

6 Conclusions

- **This part of the submission on the draft development plan does not address the question of the *location* of the zoned lands for residential development but rather the total *amount*. It is concluded that the core strategy of the draft development plan seriously under estimates the amount of land that should be zoned for residential development. The reasons for this are as follows:**
- **A certain proportion of the zoned lands that were zoned in previous development plans (legacy lands) are likely to remain undeveloped.**
- **The provision for 'headroom' or 'additional provision' of zoned lands is too restrictive which means that the plan will lack the necessary flexibility given the uncertainty about which land will be developed.**
- **The population projections up to 2031 under the Roadmap document are too low and underestimate the reality of growth of development in the EMRA region.**

¹³ *Regional Demographics and Structural Housing Demand at a County Level*, Adele Bergin And Abián García-Rodríguez, ESRI, December 2020.

¹⁴ *Institutional Investment and the Private Rental Sector in Ireland*, Ronan C. Lyons, June 2021, p. 29.

¹⁵ *Institutional Investment and the Private Rental Sector in Ireland*, Ronan C. Lyons, June 2021, Table 2, p. 28.

¹⁶ *Institutional Investment and the Private Rental Sector in Ireland*, Ronan C. Lyons, June 2021, p. 29.

¹⁷ *South Dublin Draft County Development Plan 2022-2028*, p. 29.

- The core strategy adopts an average household size that is too high and does not reflect current and projected household formation figures.
- The implications of these factors are significant. If a 60/40 split of population growth is assumed instead of the 45/55 split under the Implementation Roadmap, the population projection for the EMRA region should be adjusted upwards by 100,000 people. If a more realistic household size figure of 2.4 is assumed, the amount of zoned land that is need would be twice the amount that is provided for in the draft plan.

Appendix A – Legacy Lands Analysis

The South Dublin County Development Plan 2022-2028 identifies that 477 ha of land excluding long term strategic development sites are developable within the lifetime of the plan with potential to accommodate 23,730 units at an average unit density of 50 units per Ha.

Included in the above figure of 477 hectares is 150 hectares of land contained within the strategic development areas that are deemed capable of being delivered within the lifetime of the plan. On this basis the local authority has concluded that it has sufficient existing lands zoned within no requirement to zone additional lands to meet with housing demand over the lifetime of the plan.

An analysis of RES-N and existing residential zoned lands was undertaken to establish the quantum of land which has been zoned for residential development in previous development plans, using the 2004-2010 county development plan as the base point. The analysis focuses on larger sites within the county which are capable of delivering a significant quantum of housing.

Circa 241.8 ha or 50.6 % of the lands proposed for residential development in the forthcoming plan have been zoned for residential development since 2004 and 2010. See Table 1. Fig. 1 shows the location of these lands which are predominantly in urban fringe zones where a lack of infrastructure incl. community services and facilities may be a significant factor in causing the lack of take up of development on these lands. These lands can be referred to as 'legacy lands' given their long established zoned status in a number of development plan cycles.

Figure One – Land Capacity Sites (source: SDCC Draft Development Plan 2022-2028)

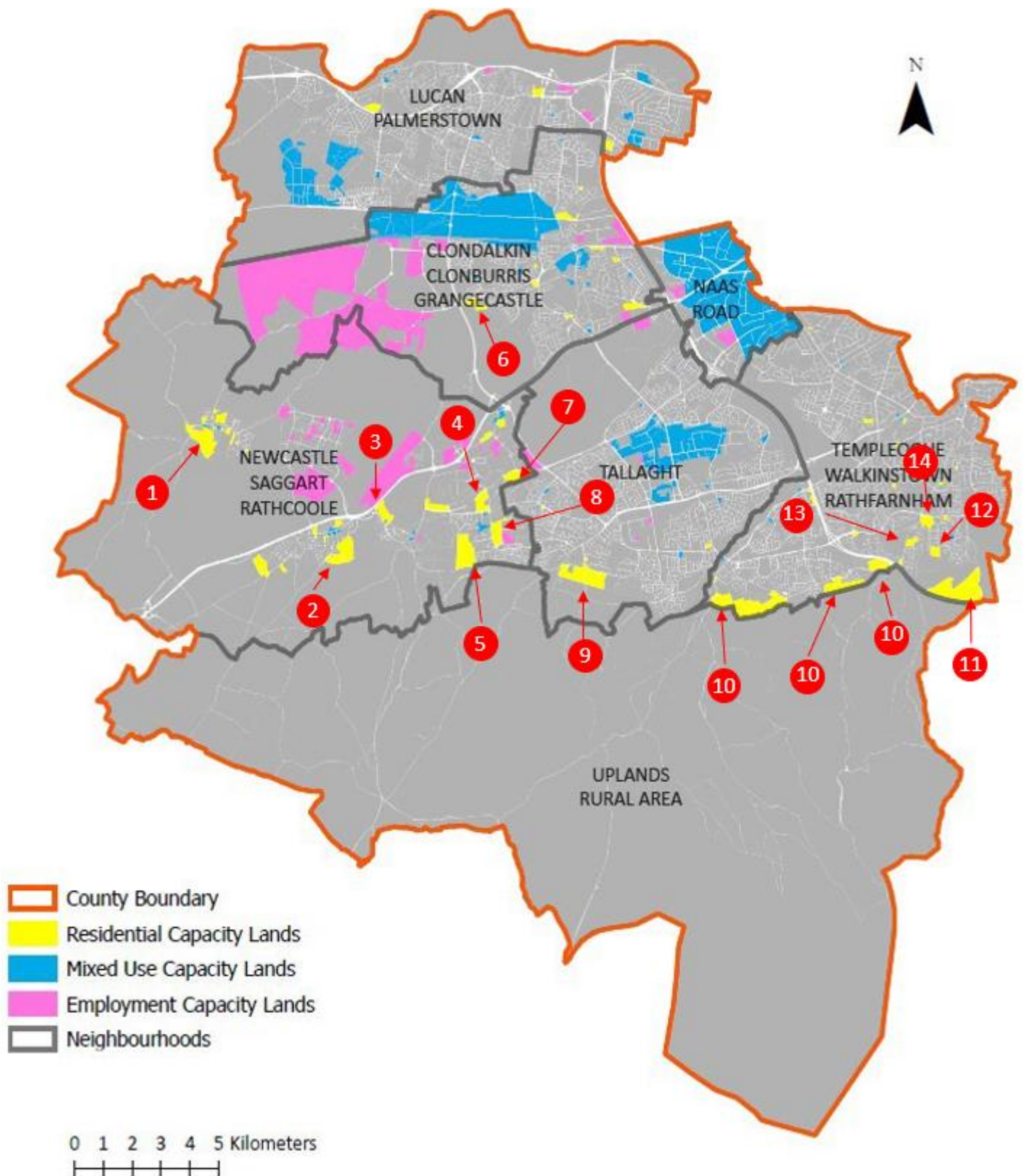


Table 1 – List of Legacy Lands Zoned in Preceding Development Plans ¹⁸

Map Reference	Location	Site Area	Land Use Zoning	Zoned Since	Construction Status
1	Land included in the Newcastle Local Area Plan	41.00	RES-N	2004	Partially Developed
2	Lands at Stoney Hill Road and Rathcoole Park, Rathcoole, Co. Dublin	14.60	RES-N	2004	Inactive
3	Lands known as Paddy Reilly lands, between Citywest Hotel and Mill Road, Saggart, Co. Dublin	5.40	RES-N	2004	Inactive
4	Site bounded by Fortunestown Lane, Garters Lane and Bianconi Avenue, Saggart, Co. Dublin	Excluded (under construction)	RES-N	2004	Under Construction
5	Lands at Boherboy, Citywest	17.50	RES-N	2004	Inactive
6	Kilcarbery Grange, Old Nangor Road	Excluded (under construction)	RES-N	2004	Under Construction
7	Lands south of Citywest Avenue, Brownsbarn, Citywest Business Park, Saggart, Co. Dublin	7.60	RES-N	2010	Inactive
8	Citywest Road and Magna Drive, Citywest, Dublin 24	Excluded (under construction)	RES-N	2004	Works Commenced
9	Lands south of Killinarden Heights	22.40	RES-N	2004	Inactive
10	Ballycullen-Oldcourt LAP	90.00	RES-N	2004	Development activity on eastern side of LAP area.
11	Lands to the West of Kilmarshogue Bridge, Whitechurch Road, Dublin 16	35.50	Existing Residential	2004	Inactive
12	Lands to the North of Edmonstown Golf Club	2	Existing Residential	2004	Inactive
13	Lands of Stocking Lane, Ballyboden	2.4	Existing Residential	2004	Inactive
14	Site at Taylors Lane and Edmondstown Road, Taylors Lane, Ballyboden, Dublin 16 (Former Good Counsel Lands)	3.4	Existing Residential	2004	Inactive
Total		241.8			

¹⁸ Source: Author's research.

Appendix B – Regional Population Distribution

Table 1 below sets out the Transitional Regional and County Population Projections to 2031 that are presented in the Implementation Roadmap, for each of the three regional assembly areas. The figures show a percentage of population in the EMRA region of between 45 and 46 % of the State population.

LOW	2016	2026	2031	Increase 16-31	
Region				Persons	%
EMRA	2,329,000	2,566,500	2,668,000	339,000	46.2
S	1,585,000	1,781,000	1,865,000	280,000	38.2
N&W	847,442	942,500	961,500	114,058	15.6
Total	4,761,442	5,290,000	5,494,500	733,058	100
HIGH					
EMRA	2,329,000	2,619,000	2,740,500	411,500	44.6
S	1,585,000	1,820,500	1,928,500	343,500	37.3
N&W	847,442	986,500	1,014,500	167,058	18.1
Total	4,761,442	5,426,000	5,683,500	922,058	100

Table 1 - Transitional Regional Population Projections to 2031 (Source: *Implementation Roadmap for the National Planning Framework*, Govt. of Ireland, July 2018, Appendix 2, p. 13.)

Table 2 shows the percentage regional breakdown of dwelling units that were granted permission during the period 2018 up to 2021 (first quarter). These figures demonstrate a gap between the breakdown across the regions of the increase in population that is expected in the population projections (table 1) and the breakdown of this increase in population if based on the actual planning permissions granted for dwelling units that are to accommodate this population increase.

Region	Units Granted Permission in all Planning Permissions		Units Granted Permission in SHD Permissions	
	2018-2021	2019-2021	2018-2021	2019-2021
EMRA	59.4	61.2	86.2	87.5
S	29.4	27.8	11.2	10.2
N&W	11.2	11.0	2.6	2.3
TOTAL	100	100	100	100

Table 2 – Percentage Regional Breakdown of Dwelling Units Granted Permission (Source: CSO).

A similar picture emerges if dwelling completion figures are analysed. As the figures in Table 3 demonstrate, the distribution of dwelling unit completions is heavily weighted towards the EMRA region, although the trend appears to be in line with the NPF as a reduction from 61 to 59 % in the EMRA region of the State total can be noted.

Region	Units Completed	
	2018-2021	2019-2021
EMRA	60.5	59.3
S	26.5	27.1
N&W	13.0	13.6
TOTAL	100	100

Table 3 – Percentage Regional Breakdown of Dwelling Units Built (Source: CSO.)

Based on the figures that are presented in tables 2 and 3 it is possible to construct an alternative distribution of the transitional population projections as presented in the Implementation Roadmap report that would represent more realistically the real pattern of population distribution based on planning permissions for dwelling units in the country. The resulting figures are presented in table 4. An average between the high and low projections is assumed. It can be seen from this table, that if the proportion of the national population increase that would be housed in the EMRA region would be 60% instead of 45%, it would result in an additional population of 124,134. As the population of South Dublin County in 2016 (278,767) was 12% of the population of the EMRA region, it can be assumed that at least **14,896** additional people would need to be housed in the county compared to the transitional population projections that have been used in the core strategy calculations. This could translate into the need for 177 additional hectares of zoned land based on 2.4 household size and 35 gross density.

Region	Implementation Roadmap		Realistic Pattern		Difference
	% of Population Increase	Population Increase	% of Population Increase	Population Increase	
EMRA	45	372,401	60	496,535	+ 124,134
REST	55	455,157	40	331,023	- 124,134
TOTAL	100	827,558	100	827,558	0

Table 4 – Comparison Regional Breakdown of Population Increase as per Implementation Roadmap vs. Planning Permissions granted.



Appendix E: Compliance with Objectives of Development Plan Prepared by Hibernia REIT

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>Overview of Objectives Aided or Complied with</i>			Total Objectives
Chapter 2-Core Strategy			
	CS4	Objective 2	39
	CS6	Objective 5	
	CS7	Objective 1,3	
Chapter 3- Natural, Cultural and Built Heritage	NCBH1	Objective 1	127
	NCBH 2	Objective 1	
	NCBH 5	Objective 1, 2	
	NCBH 11	Objective 3, 4	
	NCBH 19	Objective 3, 4, 6	
	NCBH 21	Objective 2	
	NCBH 22	Objective 1	
	NCBH 23	Objective 1	
	NCBH 24	Objective 3, 4	
	NCBH 25	Objective 2	
Chapter 4-Green Infrastructure	GI 1	Objective 1, 3	49
	GI 2	Objective 1, 2, 4, 7	
	GI 4	Objective 1,3,5	
	GI 6	Objective 1, 3, 4, 5	
Chapter 5-Quality Design and Healthy Placemaking	QDP 2	Objective 1, 2	61
	QDP 4	Objective 1,2	
	QDP 5	Objective 1, 2	
	QDP 6	Objective 1	
	QDP 7	Objective 8, 9, 10, 11, 12	
	QDP 10	Objective 1,2	
Chapter 6-Housing	H1	Objective 1, 2, 3, 6, 7, 8, 9	82
	H2	Objective 2	
	H3	Objective 1	

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

	H7	Objective 1, 2, 3, 4,	
	H8	Objective 1, 2	
	H9	Objective 1, 2	
	H10	Objective 1, 2	
	H11	Objective 1, 2, 3, 4	
	H13	Objective 1,3,5	
Chapter 7-Sustainable Movement	SM2	Objective 3, 4, 5, 6, 7, 8, 13, 14	96
	SM3	Objective 3, 4	
Chapter 8-Community	COS 2	Objective 1, 4, 6,	110
	COS 3	Objective 3, 6	
	COS 4	Objective 1, 4, 5, 6, 8	
	COS 5	Objective 10, 11, 13, 14, 15, 20	
	COS 6	Objective 2, 6	
	COS 7	Objective 1, 3	
	COS 8	Objective 1,3,5,6	
	COS 11	Objective 5	
Chapter 9-Economic Development	EDE 1	Objective 1, 3, 5,6	116
	EDE 2	Objective 5	
	EDE 3	Objective 5, 7	
	EDE4	Objective 1, 2,6, 7, 12	
Chapter 10-Energy	E3	Objective 3	34
Chapter 11- Infrastructure & Environmental Services	IE 2	Objective 7	57
	IE 3	Objective 1, 2	
	IE5	Objective 2	
	IE6	Objective 1, 3	
	IE7	Objective 5, 7	
Total Number of Objectives Compliant or Aided With		128	771

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

Strategy Policy Objective		Why Newlands Farm
CHAPTER 2 CORE STRATEGY and SETTLEMENT STRATEGY		
<i>CORE STRATEGY (CS) Policy 4: Active Land Management</i> <i>Facilitate the re-use and regeneration of vacant sites and landbanks through various measures to promote compact urban growth in line with the Core Strategy.</i>		
CS4 Objective 2:	Promote the delivery of residential development through active land management measures and a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites and under-utilised areas.	Newlands Farm should be rezoned as it presents a significantly underutilised large land bank located within the existing built urban footprint of the county at a strategic location which contributes to the national objective of achieving compact urban growth.
<i>CORE STRATEGY (CS) Policy 6: Settlement Strategy - Strategic Planning Principles</i> <i>Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.</i>		
CS6 Objective 1	To implement the Growth Strategy detailed in the RSES and in particular, the delivery of sustainable growth in the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (consistent with RPO 3.1)	Newlands Farm can help achieve the growth strategy of the RSES and delivery of sustainable growth in the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (consistent with RPO 3.1).
CS6 Objective 2	To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).	Newlands Farm represents a strategic and totally underutilized infill land bank, located within the built up area of Dublin City and suburbs. Rezoning of these lands can positively contribute to achieving the target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

CS6 Objective 4	To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and/or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.	Newlands Farm can deliver a high quality residential and commercial development, designed and constructed to sufficient densities to assist with achieving compact growth which is also located on high capacity public transport nodes. This submission demonstrates that the site is fully serviced and that the public transport infrastructure already exists.
CS6 Objective 5	Design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and insofar as possible, to existing developments which need them.	Newlands farm is strategically positioned beside major public transport nodes and existing road infrastructure. The site is served by excellent public transport links including both LUAS and bus services. Newlands Farm offers an exemplary site for the promotion of Transport Orientated Development. Additionally, the vision for Newlands Farm proposes to reduce car dependency and promote active modes of transport.
CS6 Objective 6	To support, through the compact growth model in the Core Strategy and settlement strategy and by ensuring population growth and plot densities are sustainable, the just transition to a climate resilient, biodiversity-rich, environmentally sustainable and carbon neutral economy before 2050.	The rezoning of Newlands Farm to provide housing and commercial space would assist in achieving the compact growth model specified within the core strategy by delivering new homes within the Dublin city and suburbs boundary. The development vision if realised would see the site achieve the required densities whilst providing a sustainable, climate resilient and biodiversity-rich new community.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>CORE STRATEGY (CS) Policy 7: Consolidation Areas within the Dublin City and Suburbs</i> <i>Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.</i>		
CS7 Objective 1	To promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.	Newlands Farm sits within the Dublin City and Suburbs settlement boundary. Rezoning of these underutilised farmlands will consolidate a fragmented area of the county and promote more intensive population and employment uses, deliver a new sustainable community, civic and school facilities, good quality streets, and employment opportunities in area which benefits from existing transport infrastructure.
CS7 Objective 3	To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).	The rezoning of Newlands Farm will support the development of a substantial, infill site. If rezoned Hibernia REIT would welcome the opportunity a pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

CHAPTER 3 NATURAL, CULTURAL AND BUILT HERITAGE		
<i>NATURAL, CULTURAL AND BUILT HERITAGE (NCBH) Policy 1</i> <i>Protect, conserve and enhance the County's natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.</i>		
NCBH 1 Objective 1	To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and developments.	The development vision for the site includes measure to protect and enhance natural, cultural and built heritage features.
<i>Policy NCBH2: Biodiversity</i> <i>Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.</i>		
NCBH2 Objective 1	To support the implementation of the National Biodiversity Action Plan (2017- 2021) and the All-Ireland Pollinator Plan (2021-2025) and to support the adoption and implementation of the South Dublin County Biodiversity Action Plan (2020-2026) and Pollinator Action Plan (2021-2025) and any superseding plans	NF proposes a net gain in biodiversity and promotion of pollinator friendly plant and insect species on site through a series of measures and the retention and expansion of much of the biodiverse rich areas of the site.
<i>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas</i> <i>Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.</i>		
NCBH5 Objective 1	To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.	Hibernia has conducted a baseline ecological survey of the Newlands Farm site which found no species of flora or fauna of significant interest, no rare or threatened species. A suite of biodiversity and habitat enhancement measures have been catered for within the proposed vision masterplan for the site.
NCBH5 Objective 2	To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity	Newlands Farm can deliver housing whilst also ensuring the enhancement of existing ecology and biodiversity features. A baseline ecology study has been undertaken and has informed Hibernia with

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

	importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals	appropriate avoidance and mitigation measures which will be incorporated into all development design.
<i>Policy NCBH11: Tree Preservation Orders and Other Tree Protections</i> <i>Review Tree Preservation Orders (TPO) within the County and maintain the conservation value of trees and groups of trees that are the subject of a Tree Preservation Order while also recognising the value of and protecting trees and hedgerows which are not subject to a TPO</i>		
NCBH11 Objective 3	To protect and retain existing trees, hedgerows, and woodlands which are of amenity and/or biodiversity and/or carbon sequestration value and/or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area	Hibernia's proposal and vision for NF aims to protect and retain existing trees, hedgerows and woodlands which are of amenity and or/biodiversity value. This has been informed by the baseline ecology study prepared for the site.
NCBH11 Objective 4	To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4, Green Infrastructure).	Hibernia proposes to protect and retain boundary treelines, hedgerows and woodlands with the aim of retaining as much of the treelines and hedgerows within the site as possible. The site occupies a key position with the potential to serve as an ecological corridor between the existing Ballymount Park to the East and CRH lands and Newlands Golf Course to the West. The existing high quality natural environment can be enhanced to strengthen the network of green lands as well as preserve and develop the fauna and flora.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

<i>Policy NCBH19: Protected Structures</i> <i>Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly</i>		
NCBH 19 Objective 3	To address dereliction and to welcome, encourage and support the rehabilitation, renovation, appropriate use and sensitive re-use of Protected Structures consistent with RPO 9.30 of the RSES.	The proposed sensitive restoration of Katharine Tynan house will see a derelict protected structure restored and refurbished to provide a vital piece of communal infrastructure. Hibernia REIT has engaged Grade 1 conservation architects to oversee the design and proposed restoration of the house, ensuring that it is done in a sensitive and historically appropriate manner.
NCBH19 Objective 4	To support alternative uses for Protected Structures including former institutional sites in order to provide continued security of the heritage value of these buildings, attendant grounds and associated landscape features. To this end, the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the protected structure where the use proposed is compatible with the existing structure and where the proposed development is consistent with best practice conservation policies and the proper planning and sustainable development of the area.	The restoration of Katharine Tynan House proposes a change of use to allow for the building to be used as a cultural and communal hub to serve the local area. The restored house would create a multifunctional community space with a distinctive focus on the promotion of heritage and literature, along with a broad range of other activities to sustain and promote vibrant communities. Additionally, the adjoining gardens provides a space to act as a community hub for biodiversity initiatives and learning, cultural events and historical events appropriate to the history of the house and its curtilage.
NCBH19 Objective 6	To ensure that any works to upgrade the energy efficiency of Protected Structures and historic buildings are sensitive to traditional construction methods and materials and do not have a detrimental physical or visual impact on the structure. Regard should be had to the DAHG publication ‘Energy Efficiency in Traditional Buildings’ 2010	Hibernia REIT has developed an energy efficiency upgrade plan for the proposed restoration of Katherine Tynan house which is sensitive to its nature as a historic building and is sensitive to traditional construction methods and materials with no detrimental physical or visual impact on the structure. The restoration of the house includes the use of on-site renewable energy via minimal impact solar PV panels located on the restored outbuildings.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

Policy NCBH21: Vernacular/Traditional and Older Buildings, Estates and Streetscapes Ensure appropriate design of new-build elements and interventions in historic buildings and environments.		
NCBH21 Objective 2	To ensure that the redevelopment of older buildings, including extensions and renovation works do not compromise or erode the architectural interest, character or visual setting of such buildings including surrounding housing estates or streetscapes.	The proposed restoration represent an opportunity to revive the house, enhance its appreciation and association with Katherine Tynan and to better understand the historic fabric and significance. Restoration of lost elements is proposed in historic architectural style based on documentary research and physical evidence, with the aim of enabling the hidden quality of the historic structure to be appreciated.
Policy NCBH22: Features of Interest Secure the identification, protection and conservation of historic items and features of interest throughout the County including street furniture, surface finishes, roadside installations, items of industrial heritage and other stand-alone features of interest.		
NCBH 22 Objective 1:	To ensure that development within the county including the council's own development seeks to retain, refurbish and incorporate historic items and features of interest	Hibernia REIT seeks to retain and enhance the historic curtilage and structure of Katherine Tynan house through its refurbishment and transference into a vibrant community space. The historical and architectural features of the house and its curtilage including gardens and walls would be fully restored to provide a historically appropriate place of local interest.
NATURAL, CULTURAL AND BUILT HERITAGE (NCBH) Policy 23 Placemaking and the Historic Built Environment Ensure that historic buildings and built environments are sensitively incorporated within development and regeneration schemes, taking advantage of their intrinsic attributes including character, visual amenity, sense of identity and sense of place.		
NCBH 23 Objective 1	Ensure that historic buildings and built environments are sensitively incorporated within development and regeneration schemes, taking advantage of their intrinsic attributes including character, visual amenity, sense of identity and sense of place.	Katherine Tynan House is proposed to be integrated into the Newlands Farm development to serve as a cultural hub, community space and source of historical interest for local residents and those from surrounding areas. The restored house would act as a focal point for the development.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>Policy NCBH24: Adapting and Reusing Historic Buildings</i> <i>Support and encourage the reuse and adaptation of historic, traditional, and older vacant and derelict buildings as a key component of promoting sustainable development and achieving compact growth and as a catalyst for the revitalisation of historic village and town centres</i>		
NCBH 24 Objective 3	To encourage and support the delivery of projects that repair and conserve historic structures in accordance with national grant schemes for architectural conservation.	Hibernia REIT propose to sensitively restore and refurbish Katherine Tynan House in accordance with grant schemes for architectural conservation. A built heritage grant has already been awarded to carry out stabilisation works for the scheme and a planning application lodged for its full refurbishment.
NCBH24 Objective 4	To ensure the reuse, adaption and upgrade of historic buildings is in accordance with conservation principles including minimal intervention, reversibility, respectful alteration and repair.	<p>It is proposed that Katherine Tynan House will be conserved in accordance with conservation principles including minimal intervention, reversibility, respectful alteration, and repair.</p> <p>Conservation work is proposed on the basis of understanding the building and its historical significance. The primary aim is the retention and recovery of the building which is true to its original design and construction. Alterations will be carried out in accordance with the principle of 'minimal intervention'. Lost elements to be reconstructed will aim for historic authenticity and avoid conjecture in as far as possible.</p>
<i>Policy NCBH25: Placemaking and the Historic Built Environment</i> <i>Ensure that historic buildings and built environments are sensitively incorporated within development and regeneration schemes, taking advantage of their intrinsic attributes including character, visual amenity, sense of identity and place</i>		
NCBH25 Objective 2	To ensure that conservation is a key design principle underpinning any redevelopment/regeneration schemes that affect the historic built environments of the County.	Conservation work will be based on the understanding of the building and its historical development, and the primary aim will be to retain and recover the significance of the building. All alterations will be carried out under the principle of 'minimal intervention'.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<p>CHAPTER 4 GREEN INFRASTRUCTURE</p> <p><i>Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.</i></p>		
<p>GREEN INFRASTRUCTURE (GI) Policy 1 <i>Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.</i></p>		
GI 1 Objective 1	To establish a coherent, integrated and evolving GI network across South Dublin County with parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams and other green and blue assets forming the strategic links and to integrate the objectives of the GI Strategy throughout all relevant land-use plans and these measures to be incorporated into all development in the County.	It is envisaged that Newlands Farm could become part of the existing GI network in SDCC forming a new node and strengthening existing connections by enhancing the present drainage sink of Ballymount park. A 40-acre park has been proposed for Newlands Farm which would connect with the existing Ballymount Park. This combined with other open space features of the development would provide for over 100 acres of open and accessible green space.
GI 1 Objective 3	To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.	Hibernia REIT proposes making the entire development of Newlands Farm fully accessible to the public, enhancing biodiversity features of the site and incorporating distinctive landscape features through its SUD's strategy and showcasing enhanced biodiversity, wildlife and other landscape features. There are no of Natura 2000 sites within a 5km radius of the site.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

GREEN INFRASTRUCTURE (GI) Policy 2 Biodiversity Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021- 2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the East Region Spatial and Economic Strategy (RSES).		
GI 2 Objective 1	To reduce fragmentation and enhance South Dublin's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.	Newlands Farm is proposed as a strengthening link in the local, Green Infrastructure network between to immediately adjoining Ballymount Park, CRH lands and Newlands Golf Club and their wider connections.
GI 2 Objective 2	To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process.	The vision for Newland Farm has been devised to respond to the site's existing ecological features, such as mature trees and hedgerows and wetlands, allowing them to remain intact and enhanced to appropriate management measures.
GI 2 Objective 4	Integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 13 Implementation and the policies and objectives of this chapter.	Newlands Farm will adhere to requirements set out in Chapter 13 objectives regarding integrated GI.

GREEN INFRASTRUCTURE (GI) Policy Sustainable Urban Drainage Systems Require the provision of Sustainable Urban Drainage Systems (SUDS) in the County and maximise the amenity and biodiversity value of these systems.		
GI4 Objective 1	To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SuDS) using surface water and nature based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.	The proposed SuDS strategy for Newlands Farm limits the surface water run-off through localised catchments and providing nature based solutions. The SuDS strategy for the site would be designed in accordance with South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

GI4 Objective 3	To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.	The development vision for Newlands Farm includes the provision of multifunctional open space with provision for ecology and sustainable water management.
GI4 Objective 5	To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network	The development vision proposes SuDS features to restrict and delay runoff from streets entering the storm drainage network.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

GREEN INFRASTRUCTURE (GI) Policy 6: Human Health and Wellbeing Improve the accessibility and recreational amenity of the County's GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.		
GI 6 Objective 1	To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses (See Chapter 8 Community and Public Open Space).	The rezoning of Newlands Farm has the potential to open up an green space and an existing heritage site to the local community for multiple uses.
GI 6 Objective 3	To provide accessible, attractive and safe routes linking settlements to the GI network of the County.	The vision for Newlands Farm includes a network of safe walking, cycling and biodiversity trails linking with existing green spaces and community areas and provide access to new recreational areas and sports amenities.
GI 6 Objective 4	To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8 of this plan and South Dublin County's Parks and Open Space Strategy.	Newlands Farm aims to provide a real parkland amenity alongside the development by preserving much of the existing green space. This entails over 40 acres of actively managed parkland, and over 100 acres when added to the existing Ballymount park
GI 6 Objective 5	To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.	Newlands Farm proposes the creation of a 4km biodiversity trail accessible to all, connecting green spaces and wetlands with running, walking and cycling tracks internally that will connect with existing local networks.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

CHAPTER 5 QUALITY DESIGN AND HEALTHY PLACEMAKING		
QUALITY DESIGN AND HEALTHY PLACEMAKING (QDP) Policy 2 Overarching - Successful and Sustainable Neighbourhoods		
Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and functional places to live, work, visit, socialise and invest in throughout the County.		
QDP2 Objective 1	To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.	Hibernia REIT will satisfy the objective for applications for new developments to be accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design for Newlands Farm.
QDP2 Objective 2	To ensure that 'The Plan Approach' to development is taken into consideration by the applicant and demonstrated during any pre-application consultations (under section 247 of the Planning & Development Act, 2000, as amended).	Hibernia REIT will illustrate how 'The Plan Approach' to development is considered during the pre-application consultation and will work with the local authority to develop a plan approach for the site.
HIGH QUALITY DESIGN AND HEALTHY PLACEMAKING (QDP) Policy 4 Healthy Placemaking		
<i>Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.</i>		
QDP4 Objective 1	To deliver successful and sustainable neighbourhoods that are attractive, connected, vibrant and well-functioning through high quality design and healthy placemaking in a manner which reduces the need to travel, facilitates a mix of uses and the efficient use of land and infrastructure in line with the provisions of NPO 4 and 26 of the NPF and RPO's 6.12, 9.10 and 9.11 of the RSES.	Newlands Farm aims to be co-created with the local community to generate ideas regarding design elements. Newlands Farm aims to provide all amenities for daily life to residents and achieve the goals of a 10-minute city. Access to green space and biodiversity will provide a healthy living environment for residents.
QDP4 Objective 2	To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.	Newlands Farm can deliver a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

QUALITY DESIGN AND HEALTHY PLACEMAKING (QDP) Policy 5 Connected Neighbourhoods Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.		
QDP5 Objective 1:	To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7 Sustainable Movement and Chapter 11 Our Neighbourhoods for further details)	Newlands Farm seeks to improve permeability in-between Tallaght and Clondalkin, improving safe pedestrian and cyclist access to the Red Cow Luas interchange as well as creating more inclusive linkages between transport Infrastructure. NF is located on a Bus Connects corridor providing efficient access to local identified centres and the city centre.
QDP5 Objective 2:	Promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.	Newlands Farm aims to prioritise pedestrians and cyclists above automobiles.
QUALITY DESIGN AND HEALTHY PLACEMAKING (QDP) Policy 6 Public Realm Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County		
QDP6 Objective 1:	To require that all development proposals, whether in established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also Chapter 13 Implementation and Monitoring - design statements and public realm).	Newlands Farm aims to provide 40 acres of actively managed parkland, a 4km biodiversity trail, and maintain a priority green corridor through Newlands Farm allowing future access to adjoining green spaces. Significant attention to the quality of the proposed public realm has been catered for in the development proposal.
QUALITY DESIGN AND HEALTHY PLACEMAKING (QDP) Policy 7 High Quality Design – Adaptability and Inclusivity Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.		
QDP7 Objective 8:	To promote and support a Universal Design Approach to residential and non-residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the	Newlands Farm in accordance with Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – would ensure that all

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

	National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES. (See also Chapter 8 Community Infrastructure and Open Space).	environments are inclusive and can be fully used by all users regardless of age, ability or disability.
QDP7 Objective 9:	To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in the South Dublin Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide’ (2009) and the guidance on Lifetime Homes as set out in the ‘Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007).	Newlands Farm if rezoned would be designed and developed in accordance with South Dublin Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide’ (2009) and the guidance on Lifetime Homes as set out in the ‘Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007)
QDP7 Objective 10:	To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.	Newlands Farm would support the principles of universal design, promoting inclusivity and the use of the land by all ages and abilities consistent with RPO 9.12 and 9.13 of the RSES. The communal amenities and housing mix envisaged for the scheme would be designed to be universally accessible to people of all ages and abilities.
QDP7 Objective 11:	To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive county.	The vision for Newlands Farm proposes a mix of housing typology, mix of tenure, mix of social and private housing, mix of renting and for sale housing. It is envisaged that 20% of the homes would be for social housing with no recognisable delineation in order to create inclusive neighbourhood.
QDP7 Objective12:	To develop a network of pedestrian footpaths and public spaces which include facilities for people with disabilities and/or mobility impairments based on the principles of universal design.	Newlands Farm proposes to use universal design principles from the outset which will inform the creation of a network of footpaths, public spaces, and facilities accessible to all irrespective of ability level.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>QUALITY DESIGN AND HEALTHY PLACEMAKING (QDP) Policy 10 Mix of Dwelling Types</i> <i>Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</i>		
QDP10 Objective 1:	To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.	The vision masterplan for Newlands Farm has been developed with a mix of housing types and tenures informed by the South Dublin County Housing Strategy 2022-2028.
QDP10 Objective 2:	To ensure that our ageing society is catered for in a choice of housing provision having regard to South Dublin Age Friendly County Strategy and Age Friendly Ireland's Principle and Guidelines for the Planning Authority (2021)	The vision for Newlands Farm has been developed with the ageing population in mind, additionally it aims to provide opportunities for the elderly to downsize within their communities into homes which are more energy efficient, easier to maintain and accessible for those of all abilities and at all stages of life.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

CHAPTER 6 HOUSING		
<i>Housing (H) Policy 1: Housing Strategy and Interim Housing Needs and Demand Assessment Implement South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two-Year Development Plan review.</i>		
H1 Objective 1	To ensure adequate and appropriate land is zoned to facilitate and implement the aims of the Core Strategy, to deliver sustainable development, and to meet likely future housing need in the County as identified by the Housing Strategy and Interim HNDA.	The rezoning of Newlands Farm would assist in the implementation of the core strategy, to deliver sustainable development and to meet likely future housing need in the country as identified by the housing strategy and interim HNDA. In particular Newlands Farm would assist in delivering housing within the existing built footprint of the county, preventing further urban sprawl, and achieving consolidated and compact urban growth.
H1 Objective 2	To require that 25% of lands zoned for residential use, or for a mixture of residential and other uses for development of 9 or fewer houses or development of houses on land less than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Urban Regeneration and Housing Act 2015 and the Planning and Development Act 2000 (as amended).	Hibernia REIT proposes that 25% of housing units at Newlands Farm would be delivered for social and affordable housing subject to rezoning.
H1 Objective 3	To ensure that housing is available to meet the needs of people of all incomes and needs including older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.	Newlands Farm would seek to provide a mix of housing typologies and tenures which will meet the needs of people of all incomes and ages.
H1 Objective 6	To ensure the selection of land or housing units to purchase or lease by the Council, including Part V, promotes the development of sustainable and mixed income communities.	Housing purchased or leased by the council would be integrated into Newlands Farm without demarcation in order to counteract undue segregation by persons of different social backgrounds.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

H1 Objective 7	To provide social and affordable housing over the Plan period to meet forecast future housing need as identified in the Housing Strategy and interim HNDA.	Hibernia REIT is committed to providing 20% of housing at Newlands Farm to social and affordable housing to accommodate future housing needs subject to rezoning.
H1 Objective 8	To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries suited to their strategic regional role, subject to good design and development management standards being met.	Newlands Farm is located within Dublin City and Suburbs and the County's town boundaries. Newlands Farm can contribute positively towards population growth in housing densities contiguous to Dublin City suburb boundaries.
<i>Housing (H) Policy 2: Supply of Housing</i> <i>Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.</i>		
H2 Objective 2	To ensure that sufficient zoned land, integrating land use and transport and which can be serviced is available at appropriate locations to satisfy the housing requirements of the County and to support and facilitate the development of housing lands based on the Settlement Strategy outlined in Chapter 2: Core Strategy and Settlement Strategy.	Newlands Farm should be rezoned in order to satisfy the housing requirements of the county to support and facilitate the development of residential lands in strategic locations.
H2 Objective 3	To promote and facilitate the development of infill schemes throughout the County where it has been identified that such schemes will contribute towards the enhancement of communities within the County subject to the protection of residential amenity ensuring that sufficient and appropriate public spaces and amenities are preserved in existing residential estates.	Newlands Farm is a significant infill scheme within the county bounded by Clondalkin to the North and Tallaght to the South. The site has the potential to deliver desperately needed new home and communal amenities which would positively contribute towards the enhancement of communities within the County. The development vision for the site provides that the residential amenity of surrounding neighbourhoods would be preserved through the deliver of enhanced and all necessary amenities within the site itself.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>Housing (H) Policy 3: Housing for Older People</i> <i>Support the provision of accommodation for older people in established residential and mixed-use areas offering a choice and mix of accommodation types to older people (independent and semi- independent living) within their communities and at locations that are proximate to services and amenities.</i>		
H3 Objective 1	To support housing that is designed for older people (including independent, semi- independent or nursing home accommodation) in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.	Newlands Farm has capacity to accommodate semi-independent living or indeed a nursing home facility that would benefit an abundance of services including communal, parkland, retail and social amenities whilst also benefiting from unrivalled public transport connections required to create inclusive and sustainable neighbourhoods for older people.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

<i>Housing (H) Policy 7: Residential Design and Layout</i> <i>Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development</i>		
H7 Objective 1	To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) and Chapter 13: Implementation and Monitoring.	Newlands Farm in accordance with Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) would be designed to incorporate both national and international best practice in terms of placemaking and housing design. The public realm and provision of amenities would be sensitively designed to a high-quality living environment for residents.
H7 Objective 2	To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities	If rezoned, the development would seek to be a net zero carbon development in operation, with all buildings being designed and constructed to consume the least possible energy. All homes would be all-electric and benefit from an onsite renewable including solar PV panels. Certification to the Irish Green building Council’s Home Performance Index as well as LEED (Leadership in Energy and Environmental Design) Communities will provide assurance that all housing is energy efficient.
H7 Objective 3	To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour, and only progressing vehicle permeability schemes where necessary.	The vision for Newlands Farm seeks to vastly improve the permeability of the site and create a better-connected community, opening the lands and prioritising pedestrian and cyclist permeability whilst limiting the level of vehicular movement through the proposed development.
H7 Objective 4:	To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the	If rezoned Newlands Farm would provide an integrated and balanced approach to movement, placemaking and streetscape design in accordance

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

	Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).	with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG.
<i>Housing (H) Policy 8: Public Open Space</i> <i>Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.</i>		
H8 Objective 1	To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring.	The open spaces at Newlands Farm would be designed and built in compliance with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring
H8 Objective 2	To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.	The vision for Newlands Farm considers the need for passive surveillance from residential development. Open spaces would be designed with the prioritisation of visibility to green and open space that is intended to greatly improve passive surveillance whilst also promoting connection with biophilia and the natural environment.
<i>Housing (H) Policy 9: Private and Semi-Private Open Space</i> <i>Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.</i>		
H9 Objective 1	To ensure that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 13: Implementation and Monitoring.	If rezoned, the housing and open spaces within the development would be designed with qualitative and quantitative standards set out set out in Chapter 13: Implementation and Monitoring.
H9 Objective 2	To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.	Newlands Farm would provide an array of semi-private and communal amenity space including facilities for sporting activities and other passive activities associated with the promotion of healthy, active, and socially inclusive lifestyles.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>Housing (H) Policy 10: Internal Residential Accommodation</i> <i>Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.</i>		
H10 Objective 1	To promote the provision of high-quality houses and apartments/duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 13: Implementation and Monitoring.	Housing at Newlands Farm would be designed in line with relevant quantitative and qualitative standards in accordance with Ministerial Guidelines and as set out in Chapter 13: Implementation and Monitoring.
H10 Objective 2	To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity.	The residential accommodation at Newlands Farm is envisaged to be fully adaptable and would be designed to absorb changes over the lifecycle of the buildings.
<i>Housing (H) Policy 11: Privacy and Security</i> <i>Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</i>		
H11 Objective 1	To ensure there is a clear definition and delineation between private, semi-private (communal) and the public open spaces that serve residential development.	Design and layout of housing at Newlands Farm will create clear definition between private, semi-private and public open spaces of the residential development.
H11 Objective 2	To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.	The vision for Newlands Farm provides that every home is to have direct greenspace accessibility and visibility, enhancing passive security of the developments public realm.
H11 Objective 3	To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.	Private open spaces at Newlands Farm would be protected by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.
H11 Objective 4	To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.	Above ground balconies would be designed to create adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<p>Housing (H) Policy 13: Residential Consolidation</p> <p>Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.</p>		
H13 Objective 1	To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.	The rezoning of Newlands Farm would support the residential consolidation of the county and sustainable intensification at a strategic location within the county. Hibernia REIT has already consulted with local stakeholders and is committed to doing so to ensure that the proposed development is of positive benefit for all.
H13 Objective 2	To maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 13 Implementation and Monitoring.	Newlands farm can positively contribute towards the consolidation of the county's housing stock through infill development of a 144 acre site in an established residential area which would comply with the appropriate safeguards and standards identified in Chapter 13 Implementation and Monitoring.
H13 Objective 5	To ensure that new development in established areas does not unduly impact on the amenities or character of an area	The development vision for Newlands Farm has been designed to ensure that the amenity or character of the existing area would not be impacted but rather enhanced if realised.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

CHAPTER 7 SUSTAINABLE MOVEMENT		
<i>SUSTAINABLE MOVEMENT (SM) Policy 2: Walking and Cycling</i> <i>Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.</i>		
SM2 Objective 3	To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.	Newlands Farm proposes a sustainable development which exemplifies sustainable movement through prioritisation of foot traffic and cyclists over automobiles throughout the development. Furthermore, the sites location provides that internal cycling and walking trails could be readily connected to the wider county network.
SM2 Objective 4	To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers.	If rezoned, Newlands Farm would open a non-accessible site to the public allowing for improved access to the facilities proposed for the development and existing facilities in the local area. The site would be managed, further reducing the potential for anti-social behaviour.
SM2 Objective 5	To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.	Newlands Farm would adhere to the Design Manual for Urban Roads and Streets with these guidelines incorporated into the proposal for the site.
SM2 Objective 6	To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance,	Newlands Farm would adhere to the principles, approaches and standards contained in the National Cycle Manual.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

	subject to any design having regard to environmental sensitivities.	
SM2 Objective 7	<p>To promote walking and cycling for school trips by implementing the following measures:</p> <ul style="list-style-type: none"> – Identifying school sites that are as close as possible to the communities they serve; – Ensuring that multiple access points are provided to school sites for pedestrians and cyclists; – Ensuring that adequate and secure bicycle storage is provided within schools; – Promoting initiatives such as the ‘Green Schools’ and ‘Schools Streets’ projects; and – Prioritising school routes for permeability projects and provision and enhancement of pedestrian and cycle ways. <ul style="list-style-type: none"> - Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools. 	<p>The preferred location of primary and post primary schools have been identified in the visionary plan prepared for the site and have been situated in close proximity by foot or bicycle to the residential areas of the development. Furthermore, the development would seek to provide multiple access to school sites for pedestrians and cyclists and Ensure adequate bicycle storage is provided.</p> <p>The proposed location of the schools has been consolidated beside other key pieces of infrastructure such as sports facilities and the communal hub of Katharine Tynan house to prevent car travel between the facilities and to promote walking and cycling.</p> <p>Additionally, Hibernia REIT would work with the local schools on Green Schools and Schools Streets initiatives in line with our Sustainability ethos and culture.</p>
SM2 Objective 8	To work with the NTA to acquire funding and secure full implementation of the Cycle South Dublin programme and the Sustainable Movement Studies recommendations.	Newlands Farm would seek to help implement the Cycle South Dublin programme and the Sustainable Movement Studies recommendations. Hibernia REIT is fully committed to working with the NTA to help realise these recommendations.
SM2 Objective 13	To ensure that new walking and cycling routes are designed, insofar as possible, to function as links in the County’s green infrastructure network and that adequate replacement and additional planting of native species and pollinators is provided, and that SuDS approaches are used to deal with surface water run- off.	Newlands Farm proposes 4km biodiversity trail connecting green spaces and wetlands with running, walking and cycling tracks. Planting of native species of trees, hedgerows and wildflowers in conjunction with this to encourage greater biodiversity. SUDS recommendations will be utilised throughout, managing run off from buildings and all hardstanding

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

		areas and to enhance the wetland areas of the site, prevent downstream flooding and create carbon sinks.
SM2 Objective 14	To ensure that all walking and cycling routes have regard to environmental conditions and sensitivities including biodiversity, protected species, and designated sites and to incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.	A proposed Biodiversity trail would be designed with environmental assessments of biodiversity, protected species and designated sites as driver of design principles. The routes and trail would be co-created with the local community, with awareness and buy-in central to all engagement.
<i>SUSTAINABLE MOVEMENT (SM) Policy 3: Public Transport – General</i> <i>Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.</i>		
SM3 Objective 3	To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.	If realised, Newlands Farm would allow for greater access to public transport by opening the site to the public, improving walking, and cycling permeability to employment areas. The site offers a significant opportunity for the realisation of Transport Orientated Development along existing and proposed public transport routes and nodes including the Luas red line and Bus Connects. The site has significant potential to positively contribute to compact growth policies, consolidating development around existing and planned public transport routes.
SM3 Objective 4	To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.	The development of Newlands farm would allow for the increased permeability of existing public transport nodes located along the N7 including providing pedestrian and cyclist access to the Red Cow interchange and proposed bus connects routes along the Belgard road. The development of Newlands Farm would assist in increasing the catchment and more particularly improving the commercial viability of existing and proposed public transport routes.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

CHAPTER 8 COMMUNITY		
<i>COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy COS 2 Social/Community Infrastructure</i> <i>Support the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities, close to the communities they serve, in accordance with RPO 9.14 of the RSES. (See also Chapter 5, Quality Design and Healthy Placemaking)</i>		
COS 2 Objective 1:	To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new communities in tandem with housing development, and in accordance with the phasing requirements of Local Area Plans and Planning Schemes.	If rezoned, Newlands Farm will provide facilities in tandem with housing throughout the development, incorporating commercial development along with social and communal amenities such as features such as restaurants, retail, cafes, offices, primary and post primary schools, health care facilities, community spaces, cultural hubs, sports facilities, childcare and public facilities.
COS 2 Objective 4:	To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, and open spaces to create multi-purpose community hubs.	Newlands Farm proposes the clustering of communal facilities on the site to provide for both a new and the existing community. Additionally, the vision for the site considers the need to provide co-location of such facilities to ensure viability, vibrancy and reduce car journeys required to utilise such facilities. The proposed development will provide for the clustering of schools, sports, cultural and recreational facilities in an open and permeable parkland environment accessible to a new and existing community.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

<p>COS 2 Objective 6:</p>	<p>To ensure that social, community, cultural and recreational facilities are provided in a manner which reduces climate impact by supporting and promoting the following measures:</p> <ul style="list-style-type: none"> – Provision of facilities within walkable distances of communities and on public transport routes, – Promotion of walking and cycling and use of public transport via permeability and mobility management measures, – Co-location, clustering and sharing of community facilities to increase efficient use and reduce trips, – Location, siting and design to promote climate mitigation and adaptation e.g. taking advantage of solar gain, – Sourcing power from renewables such as wind and solar energy, – Use of alternative energy technologies such as heat pumps, – Energy-proofing of community buildings, – Additional tree planting and adapting management regimes in parks and public open spaces to allow more wild areas in order to increase opportunities for carbon sequestration. 	<p>Newlands Farm will provide community facilities with climate impact in mind from the onset of its design. These measures would include:</p> <ul style="list-style-type: none"> - Development that is dense and mixed use, walkable and cyclable, reducing the need for travel by car or for long distance. - Shared resources due to co-location - Different services all located in close proximity to one another. - The provision of highly efficient, renewable energy sources throughout the development including in both residential and commercial space. - Provision of a 40-acre parkland amenity including planting of native species of flora and fauna and a 4km bio-diversity trail. - Active management and enhancement of bio-diversity rich areas to create carbon sinks and to assist with climate change mitigation measures.
---------------------------	--	---

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy 3 Community Centres Ensure that communities across the county have access to multifunctional and intergenerational community centres that provide a focal point for community activities.		
COS 3 Objective 3:	To provide discretion to the Council to require residential or mixed used developments in new development areas to provide a pro rata contribution towards the provision of a community centre, in accordance with the standards set out in Objective 2 and in line with the Development Contribution Scheme	The proposed development of Katherine Tynan house on Newlands Farm would fulfil the pro rata contribution towards the provision of a community centre in accordance with the standards set out in Objective 2 and in line with the development contribution scheme.
COS 3 Objective 6:	To support and facilitate the provision of community resource centres	Newlands Farm will deliver the creation of a community resource centre at Katherine Tynan house, additional community spaces would also be provided within the development.

COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy 4 Sports Facilities and Centres Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable.		
COS 4 Objective 1:	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 multisport 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	Newlands Farm will deliver a multifunctional state of the art community sports hub including four floodlit Astro turf pitches comprising two full GAA pitches and two soccer pitches, which are flexible and adaptable to accommodate other sporting activities. A sports pavilion to support these pitches and additional dance and yoga studios, cafe and zones for informal exercise. Hibernia REIT will ensure the fair and equitable management of these facilities to ensure access for all including local sporting organisations, schools, and members of the community. The provision of these facilities will be delivered 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.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

COS 4 Objective 4:	To support and encourage the co-location and sharing of community and sporting facilities within the County where feasible. (See also Policy C8 Objective 8).	The sports facilities proposed for Newlands farm are multi-functional providing for sharing of facilities by multiple community/ sporting organisations along with schools who could benefit from the use of such facilities. It is also proposed for these facilities to be provided adjacent to a restored Katharine Tynan House in line with co-location of community infrastructure.
COS 4 Objective 5:	To support the provision of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities across the County, ensuring that the needs of differing age groups and abilities are accommodated.	Newlands Farm will provide playground areas along with spaces for informal types of physical exercise and passive outdoor time to accommodate people of all ages and abilities.
COS 4 Objective 6:	To facilitate the provision of appropriately scaled children’s play facilities and teen space facilities at suitable locations across the County within existing and new residential development.	Subject to rezoning, Newlands Farm will deliver children’s play facilities and teen space facilities in line with housing delivery, ensuring they are available for use as soon as is practically possible.
COS 4 Objective 8:	To support the provision of permanent space for well-established sports and recreational activities at appropriate locations within the County, aspiring to the standards and conditions met for such playing areas by National Governing Bodies, where feasible and in accordance with proper planning and sustainable development.	The proposed sports facilities at Newlands Farm will be permanent space for well-established sports and recreational activities and aspire to the standards and conditions met for such playing areas by National Governing Bodies, where feasible and in accordance with proper planning and sustainable development.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy 5 Parks and Public Open Space – Overarching Policy COS 5: Provide a well-connected, inclusive and integrated public open space network through a multifunctional high-quality open space hierarchy that is accessible to all who live, work and visit the County.		
COS 5 Objective 10:	To support and facilitate the key role of parks and open spaces in relation to green infrastructure including sustainable drainage systems (SuDS), flood management, biodiversity and carbon absorption and to promote connections between public open spaces and the wider GI network.	The proposed Suds strategy for the site would seek to connect with Ballymount park and other local watercourses, creating wetland areas for the enhancement of biodiversity on the site. The proposed suds strategy would provide interconnected areas along new and existing watercourses in between public open spaces and the wider GI network.
COS 5 Objective 11:	To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National Biodiversity Action Plan (2017-2021) and the All Ireland Pollinator Plan 2021-2025, the Council's Biodiversity Action Plan 2020-2026 or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.	The vision for Newlands Farm provides extensive parkland and open space which aims to improve biodiversity through the enhancement of habitats on site in hedgerows and mature treelines with expanded planting of native flora in accordance with National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan 2021-2025. Hibernia REIT is committed to fully engaging with all relevant stakeholders and incorporating the aforementioned biodiversity and pollinator plans into a comprehensive park management plan.
COS 5 Objective 13:	To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community regardless of age or ability	Newlands farm would seek to provide inclusive and safe parkland and green space for people of all ages, genders and abilities. Recreational amenities would be provided which will cater for all groups in an inclusive and vibrant environment.
COS 5 Objective 14:	To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1.	Newlands Farm proposes an extensive cycling and footpath network through the site connecting with existing networks within the county. All public and recreational facilities located within the development

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

		would be fully accessible by walking, cycling and public transport.
COS 5 Objective 15:	To support the development of passive recreation within open spaces, such as walking trails, seating provision and areas which provide for passive amenity/hobbies, and visual interest.	The vision for Newlands Farm aims to encourage locals to spend time outdoors in active and passive ways through the provision of street furniture, outdoor recreation space, biodiversity and walking trails, water features along with a restored Katherine Tynan house and its extensive gardens.
COS 5 Objective 20:	To ensure that children’s play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 13 Implementation and Monitoring	Newlands Farm would provide for children’s play areas as part of a landscape plan in accordance with the requirements set out in Chapter 13 Implementation and Monitoring.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy COS 6 Healthcare Facilities Policy COS 6: Support the Health Service Executive (HSE) in their aim to provide access to a range of quality health services, in line with Sláintecare and relative to the scale of each settlement and community, and facilitate other statutory and voluntary agencies, and the private sector in the provision of healthcare facilities and services, including the system of hospital care and the provision of community based primary care facilities appropriate to the size and scale of each settlement.		
COS 6 Objective 2:	To promote healthcare facilities of an appropriate scale to be provided in new communities on a phased basis in tandem with the delivery of housing, in accordance with the phasing requirements of Local Area Plans and approved Planning Schemes and in locations that are accessible by public transport, walking and cycling.	If rezoned, Newlands Farm will create community healthcare facilities such as a primary health care centre, dental surgeries, physiotherapy clinics etc. These facilities will be delivered in locations that are easily accessible via public transport, walking and cycling.
COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy 7 Childcare Facilities Policy COS 7 Support and facilitate the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee.		
COS7 Objective 1:	To support and facilitate the provision of childcare facilities on well located sites within or close to existing built-up areas, including adjacent to school sites, and within employment areas where the environment is appropriate, making provision to encourage sustainable transport, consistent with NPO 31 of the NPF	Newlands Farm will deliver childcare facilities in an appropriate, well-located site, in close proximity to schools and employment areas.
COS7 Objective 3:	To require childcare facilities to be provided in new communities in tandem with the delivery of residential development and, where a Local Area Plan or Planning Scheme applies, in accordance with the phasing requirements of that plan/scheme.	Newlands Farm will deliver childcare facilities in tandem with the delivery of residential development.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<p>COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy 8 Primary and Post Primary Schools</p> <p>Policy COS 8 (a): Work in conjunction with the Department of Education and Skills to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of communities.</p> <p>Policy COS8(b): Engage with the Department of Education and Skills and support the Department's School Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need</p>		
COS8 Objective 1:	To reserve and identify early on sites for primary and post-primary provision in developing areas through the Development Plan, Local Area Plans, Planning Schemes and masterplans, in consultation with the Department of Education and Skills and to ensure that designated sites are of sufficient size and are accessible cycle and pedestrian friendly locations, consistent with, consistent with NPO 31 of the NPF and RPO 9.21 of the RSES.	The development vision for Newlands Farm has identified location for the delivery of primary and post primary schools. If rezoned, Hibernia REIT will consult with the Department of Education and Skills and to ensure that designated sites are of sufficient size and are accessible cycle and pedestrian friendly locations, consistent with, consistent with NPO 31 of the NPF and RPO 9.21 of the RSES.
COS8 Objective 3:	To require schools to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans and Planning Schemes or as may be otherwise required.	Newlands Farm can deliver new schools within a new community, in tandem with the delivery of residential delivery.
COS8 Objective 5:	To promote an urban school model within built-up areas of the County, where access to off-site facilities including for sport, recreation and amenity space can be clearly demonstrated.	The delivery of schools within the Newlands Farm masterplan will conform with the school model within built-up areas of the County. Additionally, access to off-site facilities including for sport, recreation and amenity space including sporting, community and cultural facilities has already been considered in the vision document.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

COS8 Objective 6:	<p>To ensure new schools are designed and located to promote, by implementing the following measures:</p> <ul style="list-style-type: none"> - Ensuring school sites are in locations that are central and accessible to the communities they serve; - Providing infrastructure including safe cycle ways and footpaths; - Requiring a mobility management plan for all new schools that prioritises active travel modes and public transport; - Incorporating measures to promote walking and cycling at design stage including permeability and connectivity with the surrounding area through - Provision of adequate access points for pedestrians and cyclists; - Ensuring the provision of adequate secure bicycle storage; - Working with existing and new schools to increase the proportion of students walking and cycling through the promotion of initiatives such as the ‘Green Schools’ and ‘School Streets’ projects. (Refer to Chapter 7,Sustainable Movement) - Introduce measures that would support increased bus services to enable more students to travel to school through public transport. 	<p>The potential locations of schools at Newlands Farm have been selected to promote walking and cycling and use of public transport. The school sites have been positioned to serve a wide catchment area including the proposed development and the existing residential areas of Kingswood, Belgard and South Clondalkin. The promotion of healthy and active lifestyles is central to Hibernia REIT’s vision for Newlands Farm and a great level of attention has been paid to providing cycling and walking infrastructure to serve schools. Additionally, Hibernia REIT is committed to working with the local schools on Green Schools and Schools Streets initiatives in line with our Sustainability ethos and culture.</p>
-------------------	---	--

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

COMMUNITY INFRASTRUCTURE AND PUBLIC OPEN SPACE (COS) Policy 11 Arts and Cultural Facilities Policy COS 11: Facilitate and support the continued development of arts and culture within the County.		
COS11 Objective 3:	To require new commercial developments greater than 5,000 sqm in size, in the case of non-residential development, and in excess of 500 units in the case of residential development, to incorporate a physical artistic feature into the scheme to improve the built environment / public realm, which could include high quality features within the environment / landscaping, in agreement with the Council, and to invite local artists to participate where appropriate by way of open competition.	Hibernia REIT through its internal ESG and sustainability policies are committed to promotion of the arts and will provide physical artistic features within the proposed development. Hibernia REIT have an excellent track record in working with local artists to contribute positively towards the communities in which they are located or involved.
COS 11 Objective 5:	To ensure that arts and cultural facilities are accessible to all members of the community.	The proposed restoration of Katherine Tynan House as a cultural hub will be available to all members of the community, with a number of local heritage, artistic and literary groups expressing interest in the use of the restored house.

Chapter 9 Economic Development and Employment ECONOMIC DEVELOPMENT AND EMPLOYMENT (EDE) Policy 1 Overarching Support sustainable enterprise and employment growth in South Dublin County recognising the County's role in the Dublin region as a driver of economic growth.		
EDE1 Objective 1:	To enable a strong, inclusive and resilient economy, supported by enterprise, innovation and skills through the creation of places that can foster enterprise and innovation and attract investment and talent, consistent with National Strategic Outcomes 4, 5 and 6 of the NPF.	Newlands Farm proposes to provide high quality commercial space within the development which will positively contribute towards enterprise, innovation, and skills.
EDE1 Objective 3:	To ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote compact growth by strengthening the integration between employment, housing and transportation.	Newlands Farm is suitable position to accommodate a range of employment types which can be realised through the provision of commercial floor space that that it is in close proximity to proposed residential development and major public transport nodes.

Newlands Farm- Alignment with the Objectives of South Dublin’s County Development Plan 2022-2028

EDE1 Objective 5:	<p>To support the implementation of the Metropolitan Area Strategic Plan to support the objectives for the South - West Corridor and the area within the M50 by the:</p> <ul style="list-style-type: none"> • Promotion of high tech, manufacturing and research and development in Grange Castle Business Park and Citywest. • Intensification of industrial lands and mixed-use development at Naas Road/Ballymount and in Tallaght Town Centre/Cookstown while ensuring, to the greatest extent possible, the sustainability of existing businesses and employment. 	Newlands Farm can contribute positively towards the realisation of the Metropolitan Area Strategic Plan for the Southwest Corridor, providing residential and commercial space in close proximity to the Naas Road which will support the viability of intensification of the lands. Additionally, the development could act as an area for business located within the “REGEN” lands to decant to a nearby location allowing for site assembly on a larger scale to deliver the vision for the Naas Road/Ballymount area.
EDE1 Objective 6:	<p>To ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions by supporting and promoting the following measures:</p> <ul style="list-style-type: none"> - An increase in employment densities within walkable distances of communities and on public transport routes; - Promotion of walking and cycling and use of public transport through increased permeability and mobility management measures within and outside employment areas; - The sourcing of power from district heating and renewables including wind and solar 240- Additional native tree planting and landscaping on development sites to aid with carbon sequestration, contribute to the green infrastructure network of the County and promote quality placemaking. 	Newlands Farm can deliver new employment opportunities in close proximity to residential development and within walking distance and on established and new public transport routes. Additionally, Newlands Farm proposes a planting initiative of native trees and wildflowers, creation of biodiversity areas and habitats which will contribute to the green infrastructure network of the County and promote quality placemaking.
<p><i>ECONOMIC DEVELOPMENT AND EMPLOYMENT (EDE) Policy 2 Green Economy</i> <i>Support the Green Economy as a means of future proofing South Dublin County’s economy and facilitate this through orderly growth.</i></p>		
EDE2 Objective 5:	To support the promotion of skills, education and awareness raising in the energy efficiency sectors, promoting smart technologies and well-connected communities.	Newlands Farm would strive to be Irelands most sustainable and connected community incorporating the most advanced technologies to improve the energy efficiency of the development.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

<i>ECONOMIC DEVELOPMENT AND EMPLOYMENT (EDE) Policy 3 Innovative Economy</i> <i>Promote an Innovative Economy, fostering an environment which supports creativity and new technologies in the places we live, work and invest in, supported through orderly growth at strategic population and employment locations.</i>		
EDE3 Objective 5:	To promote, through good placemaking, the delivery of places and communities which encourage employers and workers alike to live in the County, closer to their workplaces, promoting more sustainable travel and a good quality of life.	Newlands Farm can deliver housing adjacent to or in close proximity of key enterprise and employment zones such as the Naas Road, Citywest and Grange Castle while also delivering new modern commercial floor space. This would assist in keeping employers and workers within the county and reducing car dependent journeys.
<i>ECONOMIC DEVELOPMENT AND EMPLOYMENT (EDE) Policy 4 Urban Growth, Regeneration and Placemaking</i> <i>Support urban growth and regeneration through the promotion of good placemaking to attract employees and employers and to provide a competitive advantage to the County and diverse investment opportunity.</i>		
EDE4 Objective 1:	To ensure that economic and employment development is located to optimise existing infrastructure and to support development and investment in the County's urban centres supporting orderly growth and placemaking	Newlands Farm can aid in the creation of economic and employment development within the existing urban footprint of the county which benefit's from unrivalled existing and proposed transport infrastructure to support orderly growth and placemaking.
EDE4 Objective 2:	To promote quality placemaking and design as an integral element of attracting investment and a diverse and creative population to live and work within the County	It is envisaged that Newlands Farm would be developed with quality design and effective placemaking strategies from the outset, making possible the delivery of thousands of homes and modern commercial floorspace to attract a diverse, creative, and educated population, along with wider investment to the county.
EDE4 Objective 6:	To support the provision of ground floor work-live units as part of mixed-use and residential developments in appropriate locations, as a means of enlivening streets and to provide flexible accommodation for small businesses.	If rezoned, Newlands farm would provide for ground floor work live units as part of the development, additionally the development would also provide flexible office accommodation for small business and remotng working facilities for residents.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

EDE4 Objective 7:	To require that employment space provided as part of new mixed-use development is suitably designed to be a viable workspace to meet the needs of a broad range of different employment types	Newlands Farm will deliver high quality, flexible commercial floor space that caters for a broad spectrum of employment types including office and non-office based employment types.
EDE4Objective 12:	To support the Government's Making Remote Work National Remote Work Strategy and the provision of appropriate IT infrastructure and facilities (including hubs at neighbourhood level) that enable a better life-work balance enabling people to live near their place of work.	Newlands Farm will assist in creating a remote work friendly environment through the provision of onsite co-working and collaboration spaces which will reduce the need to travel for work, additionally the development will incorporate high quality telecommunications infrastructure to all homes and commercial development, allowing people to stay connected.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

Chapter 10 Energy		
Energy (E) Policy 3 Energy Performance in Existing and New Buildings		
Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retrofitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans		
E3 Objective 3	To require all new development be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines	The proposed development would seek to be a net zero carbon development in operation, with all buildings being designed and constructed to consume the least possible energy. All homes and commercial space will be certified to highest sustainability standards using LEED (Leadership in Energy and Environmental Design) as a design benchmark.
EDE3 Objective 7	To promote the provision of workspace as part of any mixed-use development on REGEN zoned land	Newlands Farm as a proposed mixed-use development will provide on site workspace.

Chapter 11 Infrastructure and Environmental services		
INFRASTRUCTURE & ENVIRONMENTAL SERVICES (IE) Policy 2 Water Supply and Wastewater		
Ensure that water supply and wastewater infrastructure is sufficient to meet the growing needs of the population and to support growth in jobs over the lifetime of the Development Plan facilitating environmental protection and sustainable growth.		
IE 2 Objective 7:	To promote water conservation and best practice water conservation in all developments, including rainwater harvesting, grey water recycling and supporting the implementation of BS8515:2009 Rainwater harvesting systems – Code of practice	Newlands Farm stormwater will be collected from the development in compliance with Sustainable Urban Drainage Systems to allow for the creation of extensive wetland areas within open spaces that will join up with existing streams and other localised watercourses. The development will also include rainwater harvesting and grey water recycling supporting the implementation of BS8515:2009 Rainwater harvesting systems – Code of practice.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

INFRASTRUCTURE & ENVIRONMENTAL SERVICES (IE) Policy 3: Surface Water and Groundwater Manage surface water and protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.		
IE3 Objective 1:	To maintain, improve and enhance the environmental and ecological quality of our surface waters and groundwater by implementing the relevant programme of measures set out in the River Basin Management Plans.	The vision for Newlands Farm incorporates a series of measures in the proposed surface water drainage design such as: Surface water quantity management is provided through the use of detention basins and flow control devices to reduce the overall runoff discharging to the existing surface water network within Newlands Cross Cemetery to the current greenfield runoff. Surface water infiltration is proposed for the base and sides of the detention bases where the infiltration rates are favourable. The detention basins are provided with a stone bed to provide for settlement and filtration of sediment as the surface water flows through.
IE3 Objective 2	To maintain and enhance existing surface water drainage systems in the County and to require Sustainable urban Drainage Systems (SuDS) in new development in accordance with objectives set out in section 4.3.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.	The vision for Newlands Farm masterplan assumes the development of a comprehensive suite of SuDS to manage stormwater including individual soak ways for roof run-off from houses/ apartment blocks, pervious paving for driveways/ car parking spaces, rain harvesting/ water saving devices, infiltration of surface water through use of swales, development of retention pods, retention of existing water courses, green roofs and living walls, blue roofs, hydrocarbon interceptors will also be incorporated for all roads.

Newlands Farm- Alignment with the Objectives of South Dublin's County Development Plan 2022-2028

INFRASTRUCTURE AND ENVIRONMENTAL SERVICES (IE) POLICY 5: Information and Communications Technology (ICT) Promote and facilitate the sustainable development of a high-quality ICT network throughout the County in order to achieve social and economic development, whilst protecting the amenities of urban and rural areas.		
IE 5 Objective 2	To co-operate with the relevant agencies to facilitate the undergrounding of all electricity, telephone and television cables in urban areas wherever possible, in the interests of visual amenity.	In the event of rezoning, Hibernia will in discussion with telecommunication and utilities providers, determine the preferred connection point to any proposed development site at a later stage in the planning/design process with a preference for undergrounding of cables.
INFRASTRUCTURE AND ENVIRONMENTAL SERVICES (IE) POLICY 7 Environmental Quality Seek to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity in line with European, National and Regional policy and legislation.		
IE 7 Objective 5	To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).	Newlands Farm will be designed to minimise noise disturbance through incorporating innovative design and landscaping features in the public realm and considers the multi-functional uses of streets as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).
IE 7 Objective 7	To ensure that noise sensitive development in proximity to national and other roads provides a noise impact assessment and includes appropriate mitigation measures, such as noise barriers, set back landscaping and/or buffer zones between areas of land where development is proposed and existing and proposed national and other roads	Given the proximity of Newlands Farm to major roadways, the vision masterplan has incorporated features to mitigate the noise obstacles presented by the N7, Belgard Road and Ballymount Road. Mitigation measures proposed would include to include noise barriers, landscaping features and setbacks and buffer zones.



Appendix F: An Assessment of Housing Need Calculation in the *Draft South Dublin County Development Plan 2022-2028* Prepared by KPMG Future Analytics

September 2021

Submission to the Draft South Dublin County Council
Development Plan 2022-2028

An Assessment of Housing Need Calculation in the Draft South Dublin County Development Plan 2022-2028

Prepared By



 **Future**Analytics

For

hibernia
— REIT —

Executive Summary	I
Section 01 Introduction	1
Section 02 Demographic Rationale	2
Section 03 Housing Rationale	5
Section 04 Policy Rationale	9
Section 05 A Modified Approach	10
Section 06 Conclusion	14

Executive Summary

Considerable work has been undertaken by South Dublin County Council in the preparation of the Draft South Dublin Development Plan 2022-2028 against the backdrop of an evolving national and regional planning policy and regulatory context. The Draft Plan is prepared at a crucial time following the preparation of the National Planning Framework (NPF) and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (RSES) which seek to promote compact urban growth in our city regions. The Draft Plan has proactively embraced many of the challenges and opportunities identified in the NPF and the RSES around quantifying housing need and addressing endemic issues in the current market.

The chronic lack of supply of new housing stock in South Dublin coupled with the significant rate of population growth over the past decade has been driving up the cost to purchase and to rent, and pushed many families into living in sub-optimal housing, prevented new households from forming, and exaggerated Group Housing as a form of tenure. In the 10 year period between 2006-2016 just 8,245 units were completed in South Dublin, while population grew by 33,165 persons. This quantum of housing was a fraction of what was needed based on that new population, let alone the shifting demands of existing households.

This research assesses a single, but important variable used in the South Dublin Housing Need Demand Assessment (HNDA) related to the application of Average Household Size (AHS). Specifically, the HNDA has applied a linear regression of AHS change from 2016 (3.0 persons per household [pph]) towards an NPF national alignment by 2040 (2.5 pph), and a target of 2.74 pph by the end of the plan period. Given the specific impacts of the 2008 Financial Crash on household income, employment and housing provision in Dublin, the research in this report provides the justification for a more evidenced 2.5 pph target, over 2.74 pph considering the range of demographic, housing market and policy factors that better illustrate the lack of unit development obstructing smaller household sizes forming, and perpetuating the larger AHS that exists.

The average size of a household in South Dublin declined from 3.95 pph to 2.99 pph over the past 30 years. At each recorded Census period since 1986, AHS has declined by an average of 5.8%. This trend reversed Nationally and in South Dublin in 2016 (from an average decline of 5.8%, to an increase of 2.4%). This is the first time since the foundation of the State that the average household size increased in a census. It was also the opposite trend experienced in the rest of Europe where household size continued to decline. It is probable that the reversal in trend is not representative of actual demand, but a product of economic and housing market realities. **In order to develop a profile of actual demand, the 2016 AHS should be replaced with the pattern of change from the previous 30 years for South Dublin to determine need.**

Executive Summary

Table 1.1 below provides the Draft South Dublin County Council (SDCC) HNDA AHS (on the right) and the proposed AHS used in this study (outlined in red on the left). This approach proposes that the 2016 AHS is taken as a misnomer, and that viewing demand through the longer historical trend analysis is more representative of the current market and associated pent-up demand.

	Number of Households	Number of Persons Resident	Proposed AHS	Rate of Change	Number of Households (SDCC HNDA)	SDCC HNDA AHS	Rate of Change	Period Between Census
1986	49,906	197,080	3.95		49,906	3.95		
1991	54,802	206,383	3.77	-4.6%	54,802	3.77	-4.6%	5 years
1996	61,437	214,961	3.50	-7.1%	61,437	3.50	-7.1%	4 years
2002	73,516	236,244	3.21	-8.2%	73,516	3.21	-8.2%	6 years
2006	80,358	243,596	3.03	-5.7%	80,358	3.03	-5.7%	4 years
2011	90,019	263,723	2.93	-3.4%	90,019	2.93	-3.4%	5 years
2016	100,000	276,761	2.77	-5.5%	92,393	3.00	2.4%	5 years
2022	115,000	302,026	2.63	-5.1%	106,754	2.86	-4.3%	6 years
2028	130,000	325,285	2.50	-4.7%	118,501	2.74	-4.2%	6 years

Table 1.1: Projected Population Growth and Household Change in South Dublin 1986-2028 (Proposed and SDCC HNDA)

Maintaining the level of population growth as prescribed in the SDCC HNDA¹, the scenario presented in Table 1.1 above applies the same rate of AHS change experienced over the past 30 years to the baseline number of households. Using this rate, AHS would be projected to reach 2.5 pph by 2028, and would indicate an additional housing shortfall of over **11,000 units** above the SDCC projected need by 2028. The total projected number of households by South Dublin County Council in 2028 is 118,501, versus the 130,000 using the modified AHS approach.

This level of additional unit provision would require significantly more residentially zoned lands than is currently available. South Dublin County Council have identified 477 hectares of undeveloped residentially land zoned within the Draft Plan. It is estimated that the total potential units that this land area can accommodate will be 23,730, with an average density of 50 units per hectare (uph). Using the 2.74 pph AHS, this level of zoned land will equal the household requirement in the county by 2028, and thus meet the demand. **Using the modified target average household size (2.5 pph), alongside the indicative average density figure (50 uph), there would be a requirement for at least another 220 hectares of available land to meet the housing demands and reverse the pattern of pent-up demand that exists.**

¹ As calculated within Table 45 of Appendix 11: South Dublin Housing Strategy and Interim HNDA 2022 - 2028

Executive Summary

This report presents the argument that the average household size (2.74 pph by 2028) as set out in the Written Statement of the Draft Development Plan is too high, and that proceeding with this underlying assumption in predicting housing need will not address the pent-up demand that exists in South Dublin, and will exacerbate issues related to affordability, social housing and sub-optimal housing arrangements within the local population. Taking a revised AHS of 2.5 pph would assist in addressing this demand surplus, but would also require the zoning of an additional 220 hectares (at a minimum) of residential lands to facilitate unit development around the target 11,000 units.

The Draft Development Plan has been prepared and released during a period of dramatic policy change at a national and regional level. Specifically, the manner in which housing need is to be quantified by a local authority for their Development Plan. While SDCC must seek alignment with Housing Supply targets as set out by the Department, the method used to reach these targets does not follow a strong enough evidence base. The approach taken, although in alignment, seems to involve two entirely different models that have fundamentally different underlying methodologies. Despite the alignment, we would argue that the approach is underdeveloped, and does not dig far enough into measuring true housing need in the county.

SECTION 1

Introduction

The following report has been prepared by KPMG Future Analytics, 1 Stokes Place, St. Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants), on behalf of Hibernia Reit PLC to assess the Housing Needs and Demand Assessment (HNDA) carried out as part of the Draft South Dublin Development Plan 2022-2028. The report focuses on the importance of long-term planning for *compositional changes* within the housing market, and how inaccuracies in developing suitable future average household sizes can have significant impact on the level of unit demand in the short-term.

With the continued high levels of population growth, it is imperative that future urban development occurs in a sustainable manner, which makes most efficient use of the limited land available. This will ensure that future communities are connected and integrated within Dublin's urban form and are well placed to avail of existing and proposed services and infrastructure. The National Planning Framework recognises the inherent dangers of continued pent-up demand and under provision of housing not meeting minimum market demands.

The principal issue identified and assessed in this report is that: *the current and projected average household size (hereafter referred to as AHS) figure used in the Housing Needs and Demand Assessment (HNDA) within the Draft South Dublin Development Plan 2022-2028 does not sufficiently account for the aggravating factors present in the housing market since 2008. The core constraint in the current ESRI and South Dublin County Council (SDCC) HNDA projection modelling is that its baseline input characteristics of using 2016 data have masked the pent-up need that exists in the market. It makes the assumption at the outset that the rate in 2016 is not an outlier and is representative of a slowing in pace of AHS decline. We would argue that this is measurably false and shouldn't be used at the baseline for meeting future targets.*

The solution outlined in this research supports utilisation of a modified AHS that takes account of these aggravating factors, and determines a housing demand for the Development Plan period based on it. Rather than selecting an assumptive AHS trajectory, we put forward the utilisation of the South Dublin average AHS change over the past 30 years. This figure would discount the 2016 AHS which is judged to mask the level of need in the county.

In support of this problem statement the report also reviews each of the contributing factors that lend weight to the argument that the level of AHS decline experienced in South Dublin was not natural, but rather a product of these aggravating factors. This analysis has been subdivided into a range of Demographic Factors, Housing Market Factors, and Policy Factors and has sought to utilise the best available data on population growth, socio-economic indicators, income, market analysis and awareness of the composition of households, stock, tenure, affordability and future anticipated changes, in order to create a viable and holistic outlook.

SECTION 2

Demographic Rationale

Changing Household Demands

Over the past 50 years the primary driver of the shift in household composition has been lower fertility rates, with the replacement rate now below the rate of two children per woman. This reduction in fertility has decreased the average size of families and as a consequence, the demand for larger unit sizes. The average household size in South Dublin was 3.00 persons per household in 2016, down from 3.5 in 1996 and 3.95 in 1986 (Figure 2.1). When isolating just those persons living in apartment units, the average household size in South Dublin is significantly lower at 2.4 persons per household in 2016.

Trends in household size have also been heavily influenced by: health, longevity and migration; cultural patterns surrounding intergenerational co-residence, home leaving, cohabitation, marriage and divorce, lower mortality; and socioeconomic factors that shape trends in education, employment and housing markets. For example, in 2016 there were 40,271 persons living alone in Dublin over the age of 65, accounting for over 1-in-4 (26.8%) of all persons over 65. This rate increases to 46.8% for persons over 80 years old. Taken as a whole, these trends mean that there is a need to plan for more homes, particularly to meet the accommodation needs of smaller families and single person households (including older people), both of which are likely to increase in number.

Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type. The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150% (i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes). While it is recognised that it will be necessary to provide for a range of incomes, it is critical to accommodate the needs of increasingly more diverse household types in the context of a growing and ageing population

As the population in South Dublin continues to grow rapidly (estimated to reach 325,285 persons by 2028), and household formation continues to evolve, there will be an expanding requirement for significantly more smaller units capable of accommodating new populations, and the changing demand of the existing 300,000 persons living in South Dublin.

Table 2.1: Population Growth and Household Change in South Dublin 1986-2016 (Actual)

	Number of Households (Number)	Number of Persons Resident (Number)	Average Household Size (AHS)	Rate of Change	Period Between Census
1986	49,906	197,080	3.95		
1991	54,802	206,383	3.77	-4.6%	5 years
1996	61,437	214,961	3.50	-7.1%	4 years
2002	73,516	236,244	3.21	-8.2%	6 years
2006	80,358	243,596	3.03	-5.7%	4 years
2011	90,019	263,723	2.93	-3.4%	5 years
2016	92,393	276,761	3.00	2.2%	5 years

SECTION 2

Demographic Rationale

Comparing International Trends in Household Formation

One and two person households now comprise a majority of households in Dublin and across Ireland. This trend is set continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe.

Given the rapid urbanisation and per capita wealth change in Ireland since joining the European Union, Irish statistics on household composition do not parallel other similarly developed nations around the world. For example, Dublin, while following the trend, still has a significantly higher average household size than the EU-28, and particularly countries like France, Germany or Sweden (Figure 2.2). Over the last decade, the relative importance of the larger households has fallen significantly having profound impact on Average Household Size within the EU-28. In 2016, the AHS across Europe was registered at 2.3 pph, well below the 2.73 pph registered in Ireland, and 3.0 pph registered in South Dublin.

Analysing the number of persons by household, almost two-thirds of all households in the EU-28 were composed of one or two persons in 2016. The most common type of household is that composed of a single person (Figure 2.3); one third (33.1%) of the total number of households. This group also recorded the highest relative increase from 2006 to 2016 (3.4 percentage points (pp)). Households composed of two persons correspond to 31.7% of the total number of households in 2016 (0.8 pp increase since 2006). Larger households are becoming less common and their share has decreased, with 15.9% of households composed of three persons, 13.4% by four persons, and households with five persons or more accounted for 5.8%.

While the reduction in household size is evident at a country level, this trend is more evident in urban locations and city regions. Over the next decade, its likely that this pattern of lower AHS in Ireland and South Dublin will further converge with European counterparts.

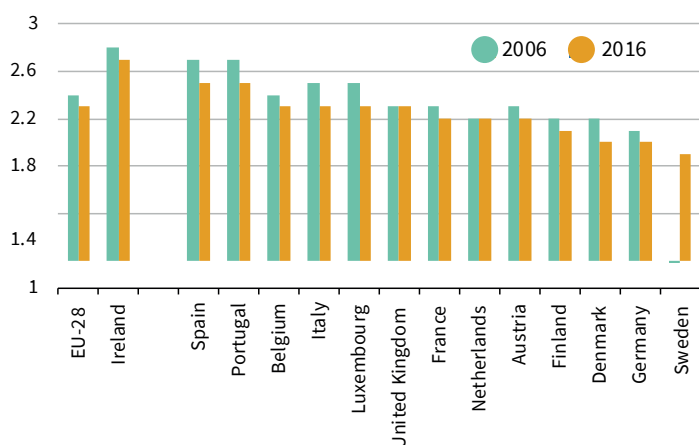


Figure 2.2: Average household size, 2006 and 2016 (average number of persons in private households)

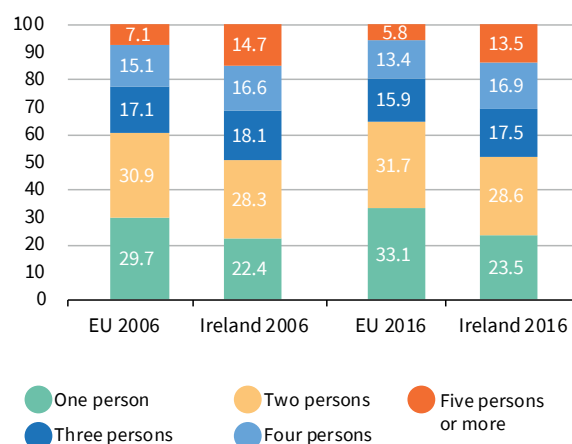


Figure 2.3: Distribution of households by size, EU-28, 2006–16

SECTION 3

Housing Rationale

Unit Stock Masking Underlying Demand

The reducing average household size in Ireland has led to the widespread development of apartments over the past few decades. Apartments continue to be an increasingly common form of housing in Ireland's urban areas. Between 2002 and 2016, the number of occupied apartments increased by 85%, nationally. Apartments now comprise 12% of all occupied households in Ireland and 35% of occupied households in Dublin City (Census 2016). However, Ireland is a long way behind European averages in the numbers of households living in apartments, especially in our cities and larger towns. In many European countries like the UK, France, Germany, Italy etc, it is normal to see 40-60% of households living in apartments.

Total unit completions in South Dublin remain weak as compared to pre-2008 (Figure 3.1). In the 10 year period between 2006-2016 just 8,245 units were completed in South Dublin, while population grew by 33,165 persons. This quantum of housing was a fraction of what was needed based on that new population, let alone the shifting demands of household formation. Moreover, between 2011-2020, just 17.5% of unit completions in South Dublin were apartments. By contrast, apartments have comprised the bulk of completed units in both Dublin City and Dún Laoghaire-Rathdown comprising 50-60% of all units.

South Dublin has a significantly lower proportion of apartments than the rest of Dublin. On average, the housing stock in Dublin was split 73% houses and 25% apartments, but in South Dublin apartments consisted of just 14% all units. **The lack of unit development to accommodate smaller households is damaging to the county, obstructing smaller household sizes forming, which perpetuates the larger AHS that exists.** Given South Dublin's proximity to the centre of Dublin City it is concerning as to the reason why this is the case. South Dublin needs to rebalance stock with future demands, similar to the other administrative areas of Dublin.

This dysfunction within the housing market over the past decade is now impacting on the quality of life of large sections of society. This is best illustrated by the fact that for the first time since the foundation of the State, average household size increased in the last census. Many thousands of people can no longer choose their desired living arrangements and must remain living with family for longer than planned in sub-optimal situations, or in group housing situations.

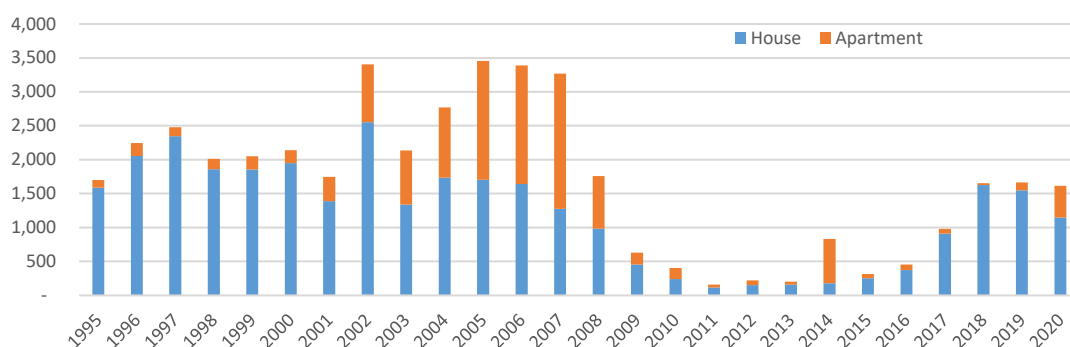


Figure 3.1: Completions Data 1995-2020 By Unit Type in South Dublin.

SECTION 3

Housing Rationale

Pipeline Not Reflecting Demand

Population in South Dublin is estimated to reach 325,285 persons by 2028, an increase of 46,516 (16.7%) from 2016. This expanding population will continue to generate an ever-increasing housing requirement in the county. The outlook is relatively positive from a housing supply capacity perspective. Granted residential planning permissions in South Dublin total of 11,703 residential units (in schemes of 10+ units) across 65 schemes as of August 2021. While a significant quantum of housing units awaits the commencement of construction, there are 3,130 units currently classified as commenced. This accounts for 26.7% of total extant permissions currently in the pipeline. Although this is a significant quantum of new units, the level of consent will need to continue at a similar pace to ensure a constant supply of new units. Based on available information, it is envisaged that a large shortfall in supply will persist in South Dublin in the face of strong, sustainable demand, until such time as unit delivery dramatically increases or population restructuring occurs.

While the Draft South Dublin Development Plan recognises the important role higher density (apartment) development will have to play in accommodating future housing need (and demand for smaller units), an analysis of the consents pipeline for South Dublin indicates that over the next 5 years residential development will continue to cater for primarily larger homes (with 43% of granted units for 3-bedroom or larger). This is well in excess of the overall Dublin average at 28%, and just short of Fingal which has consents for 46% 3-bedroom or larger.

There is a clear need for apartment and smaller unit types across the county. Given that the existing granted pipeline is geared heavily towards larger units, it is currently unlikely that targets for 1 or 2 bedroom units will be achieved. A major injection of smaller units is required in the short term to cater for the projected number of new household formations and offer the greatest feasibility to meet the market demand (pent-up and future) in terms of both unit type and scale.

In order for AHS to reduce it needs to be supported by local policy. South Dublin must actively ensure a greater proportion of 1 and 2 bed units are built on new schemes (concentrated at locations next to good transportation links and economic opportunities).

The continued lack of unit development to accommodate smaller households is damaging to the county, obstructing smaller household sizes forming, which perpetuates the larger AHS that exists.

South Dublin County Council	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	5 Bed +	Total
Granted Units 2021 Aug	2,259	4,204	4,044	974	12	-	11,703
Percentage 2021 Aug	19.3%	35.9%	34.6%	8.3%	0.1%	0.0%	

Figure 3.3 Planning Application Consents (and %) 2021 - South Dublin

SECTION 3

Housing Rationale

Affordability and Land Supply

Accelerating the delivery of new housing is imperative to combat the shortage of affordable housing which is currently distorting Dublin and South Dublin's housing market. This must be delivered in sufficient densities in order to make efficient use of available land in urban built up areas and must be supported by suitable services and public transport.

In Dublin, property prices have been increasing since 2012, with the average sale price at €514,480 in Dublin in 2020, 76.2% higher than the bottom of the market. Rents have also gone through a considerable period of change since the mid-2000s and now exceed peak pre-economic crisis levels. For Dublin, 2020's average asking market rent has been €2,023; 102% higher than the lowest point in 2012 and 43.5% higher than the previous peak in 2008 (Daft.ie, 2021). While the baseline for South Dublin is lower than that of Dun Laoghaire Rathdown and Dublin City, the rate of increase and impact of level of affordability in the market is identical. By contrast, the average level of income inflation is estimated (CSO) to be around 2-3% per cent per annum. The extent of this gap between annual income and price inflation is leaving more and more households unable to afford.

Affordability is a fundamental factor of any housing market, allowing households the choice between either renting in the short-, medium- or long-term or becoming homeowners. While a large proportion of the Irish population is likely to continue to aspire to home ownership, for many of this cohort, this will have to be delayed until such time as they have saved the necessary deposit. Therefore, they will require access to rental accommodation in the interim. For others, such as the millennial generation or the large proportion of transient workers, renting is an increasingly acceptable form of tenure. Building more 1-2 bed units also offers greater potential for households that wish to purchase but cant otherwise afford/need larger units.

SDCC have identified 477 hectares of undeveloped residentially land zoned within the Draft Development Plan to accommodate 23,730 new units over the plan period. While this upper capacity reflects the projected need in the county, it leaves little to no contingency if specified land banks are not developed for any number of market reasons over the next 6 years. **In order to balance competition, deliverability, and market forces, SDCC should have an increased level of built-in headroom with respect to residentially zoned land to ensure targets can be more readily met.**

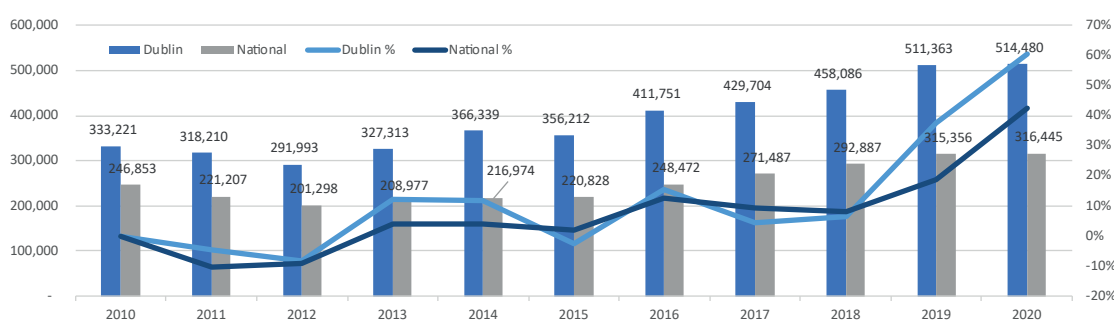


Figure 3.3 Property Price Register - Average Sale Price in Dublin 2010-2020

SECTION 3

Housing Rationale

Unit Mix and Household Composition in South Dublin

The draft Development Plan and HNDA indicates that there is an increasing demand for smaller units in South Dublin, with the share of 4-person or more households reducing year-on-year. The unit mix analysis carried out by SDCC represents this demand projection via the change in per person household composition between 2006-2016 (Figure 3.4). While this approach for assessing unit demand is valid, we would argue that the ascendancy of 1, 2, person households is much stronger than SDCC have projected. For example, between 1996 and 2016 the number of 1- and 2-person households increased dramatically from 32.7% of all households, to 44.0%. Over the same period the number of household formations of 4 persons or more reduced from 49.3% of all households to just 36.2%. Figure 3.4 demonstrates a pattern of change in all household size that is largely stagnant between 2006 and 2016, with the proportion of 1 and 2 person households actually shrinking between 2011 and 2016.

For a majority of the period between 2006 and 2016, the South Dublin housing market was unable to meet the demands of the new populations or support changes to existing household formations. Given the extremely low level of unit completions, an economy and people that were struggling with affordability, unemployment, reduced household income, being forced into sub-optimal housing conditions (increased group housing, negative equity, living at home with parents etc), it is likely that the compositional changes that occurred in this period are not reflective of unit need.

The wider argument is that there is a need for significantly more 1- and 2-bedroom units in the county to meet household demands (rather than the continued proliferation of bigger houses), and that the current demand profile that has been carried out by SDCC would lead to a unit mix unable to support the more diversified household needs of its resident population, and potentially further housing shortages.

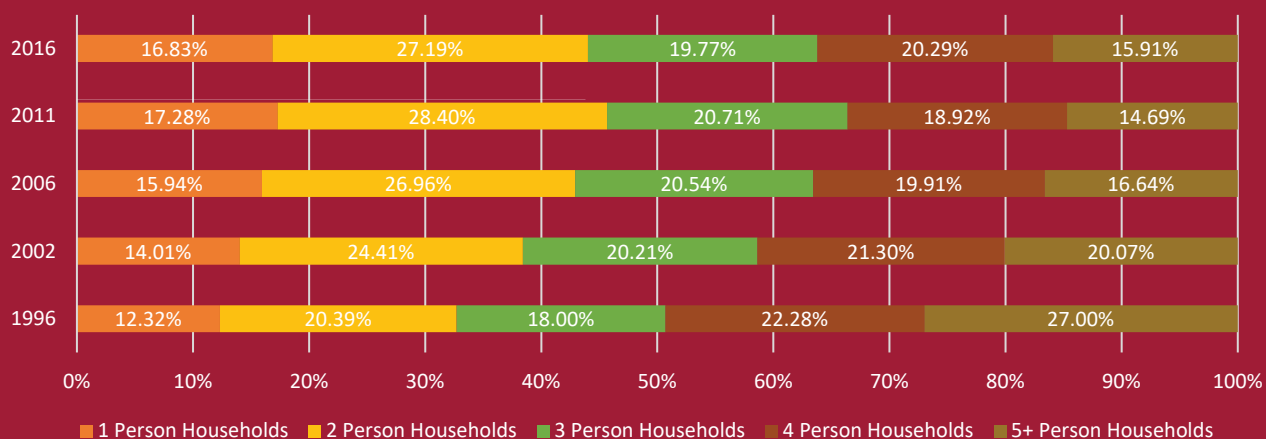


Figure 3.4 Per Person Household Change 1996-2016 in South Dublin

SECTION 4

Policy Rationale

Compact Urban Growth and Meeting Targets

In the years to 2040, work undertaken by the Economic and Social Research Institute (ESRI) indicates housing demand arising from approximately 600,000 new households in Ireland, half of which is to be met in the five cities (Dublin, Cork, Limerick, Galway and Waterford). The National Planning Framework (NPF) signals a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located and also requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

The NPF states that average household size is anticipated to decline to approximately 2.5 persons per household by 2040, specifying that urban areas are likely to have smaller households than rural parts of the Country. The Census 2016 results specify South Dublin's average household size to be 3.0. This is higher than the state figure of 2.73. The previous Regional Planning Guidelines, 2010, suggest that by 2022, average household size would be 2.24 providing a 2016 figure of 2.49 for South Dublin. This household formation has not taken place.

The current 2028 target of 2.74 persons per household for South Dublin has been prepared with the objective of the county reaching this national target of 2.5 by 2040. As referenced in the NPF, city regions, such as South Dublin, should be aiming for a target well below 2.5 persons per household by 2040, more in line with European cities. The assumption of AHS change is one of the most impactful variables within the modelling of housing need, and restricting by even fractions of a percentage points has a material impact on the understanding of how many units are actually needed.

In general terms, apartments are most appropriately located within urban areas. As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services, are also particularly suited to apartments.

City and County Development Plans must appropriately reflect this, in the context of the need to both sustainably increase housing supply and to ensure that a greater proportion of housing development takes place within the existing built-up areas of Ireland's cities and towns. This means making provision for more residential development to take place on infill and brownfield sites and as refurbishment of existing buildings, to increase urban residential densities

- 05 -

A Modified Approach

Sections 2, 3, and 4 quantitatively describe the rationale behind accelerating the assumption of Average Household Size decline at a faster pace than is projected in the Draft South Dublin Development Plan 2022-2028.

This section provides a scenario-based assessment of modifying this AHS in line with historic changes in South Dublin, discounting AHS stagnation most likely caused by a dysfunctional housing market since 2008.

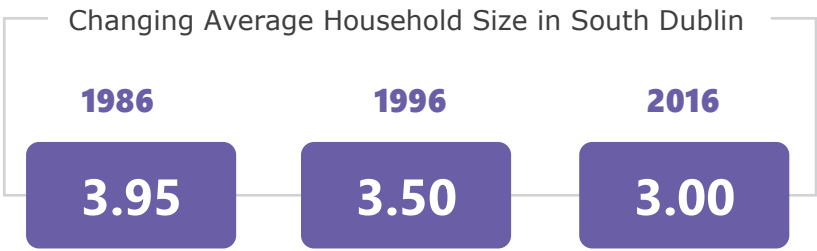


A Modified Approach

Alignment of average household size in South Dublin with historic rates of demographic and household change in the county

In considering the links between the household size and the demand for residential units the measurement of average size of households is most often used internationally. This refers to the average number of persons per household and the rate of change that occurs in its composition over time.

The principal determinant of the unit demand prediction used by South Dublin County Council (SDCC) in the Draft Housing Strategy and Interim HNDA 2022-2028 is that of **Average Household Size**. As indicated in Table 5.1, SDCC has experienced a consistent rate of AHS decline over the past 30 years (in line with much of the rest of the country). This trend reversed trajectory in 2016 for the first time, and increased from 2.93 persons per household (pph) to 3.00 pph.



There is no clear evidence to suggest that the rate of AHS decline should have increased in the period between 2011 and 2016. There is much evidence to suggest that it is attributable to lack of unit development in the county, the lasting repercussions of the economic crash of 2008, and the constraints associated with affordability that have resulted in an AHS that is likely artificially inflating.

Table 5.1: Population Growth and Household Change in South Dublin 1986-2016 (Actual)

	Number of Households (Number)	Number of Persons Resident (Number)	Average Household Size (AHS)	Rate of Change	Period Between Census
1986	49,906	197,080	3.95		
1991	54,802	206,383	3.77	-4.6%	5 years
1996	61,437	214,961	3.50	-7.1%	4 years
2002	73,516	236,244	3.21	-8.2%	6 years
2006	80,358	243,596	3.03	-5.7%	4 years
2011	90,019	263,723	2.93	-3.4%	5 years
2016	92,393	276,761	3.00	2.2%	5 years

A Modified Approach

Maintaining the same level of population growth as prescribed in the SDCC HNDA¹, the scenario presented in Table 5.2 shows AHS change using the same rate of change experienced over the past 40 years (an average of -5.8% between census periods). Using this rate, AHS would be projected to reach 2.5 pph by 2028, and would indicate an additional housing shortfall of over **11,000 units** above the SDCC projected need by 2028. The total number of households projected by South Dublin County Council for 2028² is 118,501 versus the 130,000 using the modified AHS approach (Table 5.2).

The core constraint in the current ESRI and SDCC HNDA projection modelling is that its baseline input characteristics of using 2016 data have masked the pent-up need that exists in the market. It makes the assumption at the outset that the rate in 2016 is not an outlier and is representative of a slowing in pace of AHS decline. We would argue that this is measurably false and shouldn't be used at the baseline for meeting future targets.

Using this modified approach would effectively double the overall annual requirement in the county between 2022-2028 from 2,300 units referenced in the HNDA, to 4,000 units per annum. Given this doubling of unit requirement it is critical that there is significant available land zoned within the urban boundary of South Dublin to accommodate future demand.

	Number of Households	Number of Persons Resident	Proposed AHS	Rate of Change	Number of Households (SDCC HNDA)	SDCC HNDA AHS	Rate of Change	Period Between Census
1986	49,906	197,080	3.95		49,906	3.95		
1991	54,802	206,383	3.77	-4.6%	54,802	3.77	-4.6%	5 years
1996	61,437	214,961	3.50	-7.1%	61,437	3.50	-7.1%	4 years
2002	73,516	236,244	3.21	-8.2%	73,516	3.21	-8.2%	6 years
2006	80,358	243,596	3.03	-5.7%	80,358	3.03	-5.7%	4 years
2011	90,019	263,723	2.93	-3.4%	90,019	2.93	-3.4%	5 years
2016	100,000	276,761	2.77	-5.5%	92,393	3.00	2.4%	5 years
2022	115,000	302,026	2.63	-5.1%	106,754	2.86	-4.3%	6 years
2028	130,000	325,285	2.50	-4.7%	118,501	2.74	-4.2%	6 years

Table 5.2: Projected Population Growth and Household Change in South Dublin 1986-2028 (Proposed and SDCC HNDA)

¹ As calculated within Table 45 of Appendix 11: South Dublin Housing Strategy and Interim HNDA 2022 - 2028

² As calculated within Table 45 of Appendix 11: South Dublin Housing Strategy and Interim HNDA 2022 - 2028

A Modified Approach

Impact of Modified AHS on Future Zoning Requirements in County

South Dublin County Council have identified 477 hectares of undeveloped residentially land zoned within the Draft Plan, excluding lands identified for strategic long-term development that will happen beyond the time-scale of the Plan such as SDZs and major regeneration sites. It's estimated that the total potential units that this land area can accommodate will be 23,730, at an average density of 50 units per hectare (uph). Based on the housing capacity of existing undeveloped zoned land, South Dublin County has stated there is no requirement to zone additional land to serve the needs of population and housing targets.

Using the 2.74 pph target AHS proposed by SDCC by 2028, this quantum of zoned land will equal the future household requirement in the county, and it does provide the framework for SDCC to meet their minimum housing target obligations. This approach assumes that close to 100% of land banks that have been zoned residential will be developed, and units are brought forward during the plan period. In practice, this approach leaves minimal contingency, can be anti-competitive, it will certainly impact deliverability, and is more dependant on market forces. Aside from these drawback, SDCC should be viewing housing targets as a minimum obligation. Increasing the level of built-in headroom is a recommended practice to ensure targets can be more readily met.

Using the modified AHS target identified in this study of 2.5 pph, alongside the indicative average density figure (50 uph) and the 11,000 units requirement, there would be a need for an additional 220 hectares of available land to meet the compositional demands of South Dublin residents by 2028, and reverse the pattern of pent-up demand that exists.

Regardless of the approach taken, there is a clear need to zone more lands in South Dublin. If there can be agreement that, while useful, AHS, for the range of reasons discussed in this report, can be an inherently flawed metric to use in quantifying household demand, then true housing demand is more likely to be in the range of 2.74 pph and 2.5 pph by 2028. The difference in this range has an enormous impact on unit need, and SDCC would need have significantly more residentially zoned lands available and built-in contingency to meet the needs of the resident population.

SECTION 6

Conclusion

This report presents the argument that the average household size (2.74 by 2028) as set out in the Written Statement of the Draft Development Plan is too high, and that proceeding with this underlying assumption in predicting housing need will not address the pent-up demand that exists in South Dublin, and will exacerbate issues related to affordability, social housing and sub-optimal housing arrangements within the local population.

Population targets specified in the SDCC HNDA (CSO M3F2) were selected to provide broad alignment with the RSES Appendix B population targets for South Dublin. This M3F2 scenario was considered to be a mid-growth projection for Dublin up to 2031. Moreover, there were 2 more bullish scenarios (M1F2, and M2F2 [Inflow]), and 2 more conservative (M3F2 [Outflow], M2F2 [Outflow]). We would argue that taking the mid-growth scenario as the target, and then providing enough residentially zoned lands only to meet that target, provides very little contingency to the county in the event that population growth is stronger than anticipated. It is also stated in the Housing Strategy that the NPF roadmap figures are used to establish population targets by 2028. It is later referenced that the CSO M3F2 population projections were used. There should be explicit reference made in the document as to which projections are being used by South Dublin.

The Government Housing Supply target identified for South Dublin from the Department Guidelines is for 25,459 completed units by 2028. The approach used within the HNDA identifies 23,731 units required under a separate methodology. It is judged that this provides an appropriate alignment to the Housing Supply targets, and thus validated. We would argue that too much of a focus on aligning with Housing Supply targets removes the ability for South Dublin to coherently measure housing demand, but is instead an exercise in jerry-rigging the Louth model approach toward Department guidelines.

This study reviews the principal assumptions behind this assertion in section 2, 3, and 4 of this report. These factors when taken together illustrate a clear need for apartment and smaller unit types across the county. It is argued that each of these reasons in isolation have impacted the composition of average household size, and if taken into account would contribute to a faster pace of decline than is projected in the SDCC HNDA. Moreover, that a target rate of 2.5 persons per household by 2028 (in line with the historic rate of change) would provide a better representation of demand in South Dublin. These factors can be summarised as:

- **Changing Household Demands:** The average household size (AHS) in South Dublin was 3.00 persons per household in 2016, down from 3.5 in 1996 and 3.95 in 1986. Trends in household size have been heavily influenced by: fertility, health, longevity and migration; cultural patterns surrounding intergenerational co-residence, home leaving, cohabitation, marriage and divorce, lower mortality; and socioeconomic factors that shape trends in education, employment, and indicate that majority of demand over next decade will be for 1-person or 2-person households in SDCC.

- **Comparing International Trends in Household Formation:** Ireland currently has the highest AHS in the EU-28. In 2016, the AHS across Europe was registered at 2.3 persons per household (pph), well below the 2.73 pph registered in Ireland, and 3.0 pph registered in South Dublin. Almost two-thirds of all households in the EU-28 were composed of one or two persons in 2016. Larger households are becoming less common, and while each country will evolve its own AHS, it is likely that this pattern of lower AHS in Ireland and South Dublin will further converge towards European counterparts as the dysfunction within the housing market improves in the coming years.

- **Unit Stock Masking Underlying Demand:** 85% of the current housing stock in South Dublin is Houses (versus 73% average across Dublin). Similarly, total unit completions in South Dublin remain weak as compared to pre-2008. Between 2011-2020, just 17.5% of unit completions in South Dublin were apartments. By contrast, apartments have comprised the bulk of completed units in both Dublin City and Dún Laoghaire-Rathdown comprising 50-60% of all units. The lack of unit development to accommodate smaller households is damaging to the county, obstructing smaller household sizes forming, which perpetuates the larger AHS that exists.

- **Pipeline Not Reflecting Demand:** While the Draft South Dublin Development Plan recognises the important role higher density (apartment) development will have to play in accommodating future housing need (and demand for smaller units), an analysis of the consents pipeline for South Dublin indicates that over the next 5 years residential development will continue to cater for primarily larger homes (with 43% of granted units for 3-bedroom or larger). This is well in excess of the overall Dublin average at 28%.

- **Addressing Affordability:** The chronic lack of supply of new housing stock in South Dublin over the past decade has been driving up the cost to purchase and to rent. This has resulted in a greater proportion of households on some form of income support from the State, or pushing families into living in sub-optimal housing, or preventing new households from graduating from the private rental market to owner occupancy. Given South Dublin already has an higher proportion of economically vulnerable resident populations in receipt of state-support, it is likely to experience more acute issues with respect to housing and affordability.

- **Compact Urban Growth and Aligning with National Policy:** The current 2028 target of 2.74 persons per household for South Dublin has been prepared with the objective of the county reaching this national target of 2.5 by 2040. As referenced in the NPF, city regions, such as South Dublin, should be aiming for a target well below 2.5 persons per household by 2040, more in line with European cities. The assumption of AHS change is one of the most impactful variables within the modelling of housing need, and restricting by even fractions of a percentage points has a material impact on the understanding of how many units are actually needed.

This research provides the justification for a more evidenced 2.5 pph target, over 2.74 pph in South Dublin considering the range of demographic, housing market and policy factors that better illustrate the lack of unit development obstructing smaller household sizes forming, and perpetuating the larger AHS that exists. Taking a revised AHS of 2.5 pph would assist in addressing this demand surplus, but would also require the zoning of an additional 220 hectares (at a minimum) of residential lands to facilitate unit development around the target 11,000 units.

