

**Submission to Draft South Dublin County Development Plan**

**2022 – 2028**

**For lands**

**At**

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

**September 2021**



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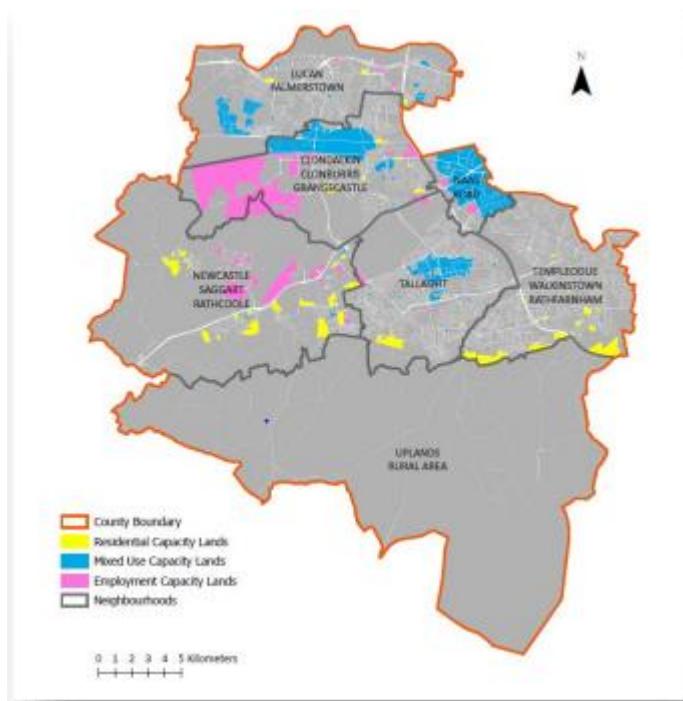
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## Introduction

The following document has been jointly prepared by Simon Clear and Associates and Doyle Kent Planning; on behalf of BCDK Ltd landowners for lands located at Edmondstown/Kilmashogue, Co Dublin.

A pre-draft submission was submitted on behalf of these landowners in respect of lands at Edmondstown (Ref. SD-C147-45). It is noted that Edmondstown lands have been identified for their potential to provide housing within the M50, identified in Table 13 as part of the south eastern suburbs.

Appendix 2 Part 1 deals with Developing the Core strategy. The Edmondstown lands are identified as Residential Capacity lands in the Templeogue, Walkinstown, Rathfarnham and Firhouse neighbourhood, as indicated in the graphic below.



Within this neighbourhood, approximately 78% of lands are categorised as Tier 2 lands, due to an indicated high cost of infrastructure provision to support the development of additional neighbourhood lands, as indicated in the Table extracts below.

## Templeogue, Walkinstown, Rathfarnham and Firhouse Neighbourhood

Total land capacity within the Templeogue, Walkinstown, Rathfarnham and Firhouse Neighbourhood provided for a total area of 120 ha.

Following assessment, 78% (c.93ha) of this total land area were categorised as Tier 2 lands. Note: The remaining 22% was identified as being serviced and Tier 1.

Approximately 59 ha of Residential and Mixed-Use lands are categorised as Tier 2 serviceable and relate to the Wastewater drainage infrastructural requirements in this neighbourhood (as detailed below).

34 ha of Residential land requires roads infrastructure to support development (as detailed below).

The following sets out the infrastructural requirements of these Tier 2 lands, Estimated costings, and the Agencies for delivery of such infrastructure. Infrastructural requirements for all Tier 2 lands have been classified as medium term i.e. deliverable within the lifetime of the plan.

Tier 2	Infrastructure Requirements	Costings	Agency
		Low: €0-€200,000  Medium: €200,000 - €1,000,000  High: €1,000,000 +	
Roads	Junction upgrade / enhancements required at Scholarstown Road/Edmondstown Road	High	Developer/SDCC led
	Road improvement works along Edmondstown Road	High	Developer/SDCC led
	New link road required from Whitechurch to the Edmondstown Road or alternative transport solution	High	Developer

The table extract indicates an ‘alternative solution’ is available to facilitate opening up the Edmondstown lands for residential development. The most feasible alternative transport solution in the short-term would be the restoration of bus public transport services as far as the M50 along Whitechurch Road, along with improvement to walking and cycling infrastructure. It has been confirmed by Irish Water that water supply and drainage services can be provided by developers.

Regional sports centres at Marlay Park and St Thomas’s, the Wicklow Way and uplands are accessed along this route and provision of public transport services would improve

sustainable access and connectivity through this area. There is a relatively low-cost solution to access that could promote early development of the the Edmondstown lands.

The NPF indicates that where public infrastructure is required, this must be identified and specific details provided by the planning authority at the time of publication of the draft and final plan. There is an indication that a new link road is required from Whitechurch to the Edmondstown Road and for junction upgrades and road improvement works along Edmondstown Road. All of these should be identified as SM objectives in Chapter 7 and on maps.

### **Submission**

The RSES Strategy identifies Edmondstown within the settlement hierarchy in South Dublin. The development capability and capacity of this area to accommodate new population in a compact, efficient and accessible way, should be recognised in the next Development Plan.

CS6 Objective 5 applies to all new suburban development and reads: - To 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. There is no need for a locality-specific SLO applying to Edmondstown.

Objective CS 6 -5 is a general objective, which is supported by the area-specific objective SM4 SLO1.

The SLO1 text should be supplemented in SM4 with an infrastructure objective to provide a link road between Whitechurch Road and Edmondstown Road, with an indicative roads objective line on Map 10.

### **Summary**

Given all of the foregoing and in order to give effect to the Objective expressed in SM4 SLO1, the public transport network extension should be identified and provision should be

made in the 6-year Road Programme for a new link road with associated pedestrian and cycle paths, between Whitechurch Road and Edmondstown Road as well as junction upgrades and road improvement works along Edmondstown Road, noting that this would be in accordance with the overarching principles in relation to Sustainable Movement and Core Strategy, expressed in the Draft County Development Plan, in particular SM1 objectives 5 and 6 and CS6 Objective 5.

It is requested that this submission be given full consideration in the preparation of the new South Dublin County Development Plan 2022-2028.

Yours sincerely,

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Simon Clear

15<sup>th</sup> September 2021.