

Our ref: MH16007

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Senior Executive Officer,  
Forward Planning Section,  
Land Use, Planning & Transportation Department,  
County Hall,  
Tallaght,  
Dublin 24

Dear Sirs,

### **South Dublin County Council Draft County Development Plan 2022-2028 Observations in relation to lands at Liffey Valley, Dublin 22**

RPS is instructed by Killeen Motor Group to submit this observation in relation to the South Dublin County Council Draft County Development Plan 2022-2028 (hereafter the draft Plan).

The observations relate to lands at Liffey Valley, Dublin 22.

The draft Plan is generally welcomed. It is requested that the content of this letter is taken into consideration in the final version of the Plan.

#### **Subject Lands**

The subject lands comprise a c. 1.65 hectare site located within Liffey Valley. The site is bound to the north by the N7, the west by Toyota Liffey Valley and to the east by a greenfield site and Giraffe Childcare, Liffey Valley. The site is bound to the south by an unnamed road which serves the Clayton Hotel, Toyota Liffey Valley, and a range of food outlets and vehicle salesrooms including Kia, Nissan, VW and Opel.

The site is roughly rectangular in size and is undeveloped. It appears to have been used as informal parking in the past.



**Figure 1: Subject Lands**

## Planning Policy

The overarching planning policy is set out in the National Planning Framework (2018) (NPF) and the Regional Spatial and Economic Strategy (2019) (RSES). The Plan should also have regard to specific planning policy requirements contained within section 28 Guidance such as Urban Development and Building Height Guidelines (2018) (hereafter the Height Guidelines).

This is enshrined in section 10(1A) of the Planning and Development Act, 2000 (as amended) which states in reference to the production of Development Plans:

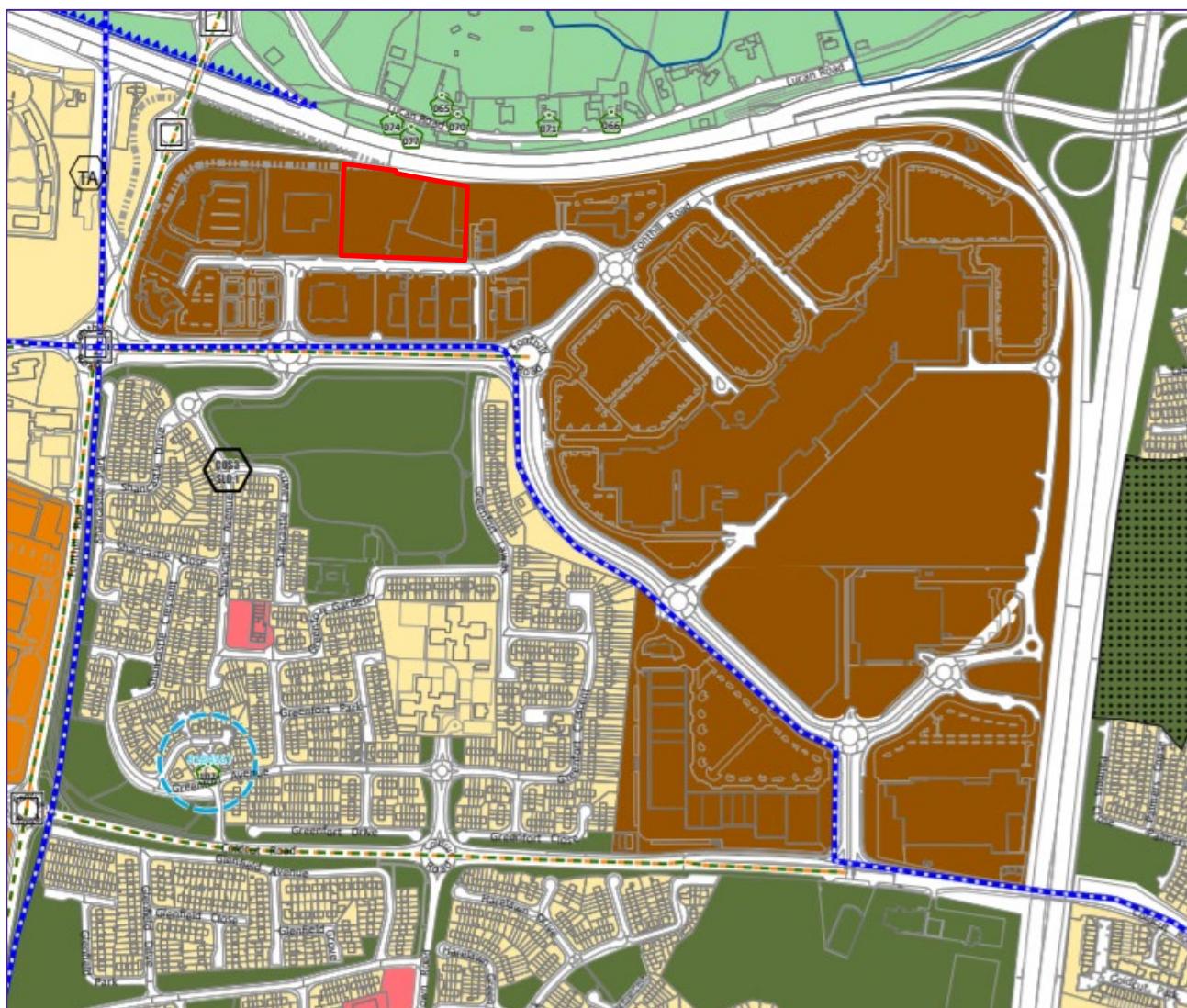
*"The written statement referred to in subsection (1) shall include a core strategy which shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28".*

Each will be referred to where relevant below.

## Zoning

The site is zoned Objective MRC in the draft Plan. The Objective is as follows:

*"Objective MRC: To protect, improve and provide for the future development of a Major Retail Centre".*



**Figure 2: Extract from draft Plan (site edged in red)**

Section 9.5 of the draft Plan sets out Core Retail Areas as required by the Retail Planning Guidelines (2012). The Core Retail Area for Liffey Valley is shown in **Figure 3**.



**Figure 3: Liffey Valley Core Retail Area and Opportunity Site (Figure 9.2 of the draft Plan)**

The supporting text notes that the Liffey Valley Shopping Centre is designated as a Major Retail Centre (MRC). This reflects the Level 2 Retail designation under the regional retail hierarchy set out in the RSES. It goes on to states: "*The established shopping centre use allows for complementary leisure, retail warehouse and commercial land uses*". This is reiterated in EDE10 Objective 1 which permits the growth of the shopping centre as well as complementary leisure/entertainment, retail warehouse and commercial land uses.

The draft Plan notes that the centre will develop as a key public transport hub, works for which should be completed by the time of adoption of the Plan in 2022.

The site and surrounding area has been designated as a Town Centre in the previous two Development Plans (2004-2010 and 2010-2016) and was designated a Major Retail Centre in the current Development Plan (2016-2022).

This zoning has failed to attract the required interest from retailers to occupy the site. This combined with changing retail habits, a movement towards online retailing, a move towards destination based retail and a national movement away from large retail provision which is reliant on car journeys requires a reassessment of the zoning to provide more options for this site.

### Proposed Alteration

The MRC zoned land at Liffey Valley comprises two distinct parts. The first is the Liffey Valley Retail Core, as shown in Figure 3 above, which has a strong retail function and comprises a range of retailers.

Secondly, the remainder of the site is developed in a more piecemeal fashion. In particular, the area to the north west of the MRC, where the subject site is located, is characterised by car sales, restaurants, a hotel and some office development. However, at this location there are still many undeveloped sites.

It is considered that the subject site (**Figure 1**) is suited for office development. It is well accessed by public transport and proposed improvements to Bus Connects and the Luas will see this improved. It is considered that an office use would enhance the area and provide a wider range of uses in the area. There are also two existing offices in the area: Volkswagen Group Ireland Ltd, Block C, Liffey Valley Office Campus and Abbott/Johnson & Johnson/Valero Energy/Astra Zenica in Block B, Liffey Valley Office Campus.

It is requested that the draft Plan is amended to provide more opportunity for development on this and surrounding sites. This will encourage a range of occupiers and investment to the area.

The following alterations are requested:

- Amend the MRC zoning to include “Offices over 1,000 sq.m” as “open for consideration”. If preferred, this can be limited to sites outside the Retail Core (as identified in Figure 6.3 of the draft Plan).
- Add a policy to support the provision of office development outside the Retail Core.
- Introduce a Specific Local Objective to encourage office development on the subject site.

The suggested Objective and Specific Local Objective are set out below:

**EDE10 Objective 5:**

To support the provision of office development on sites outside the Liffey Valley Core Retail Area.

**EDE10 SLO 1:**

To support the provision of an office development to the east of the Toyota Garage, Liffey Valley to increase the mix of uses in the area.

It is considered that the amendments set out above would encourage the development of the site for a use to which it is very well suited. The current range of policies are restrictive and have not encouraged development of the site thus far. The proposed changes would encourage the sustainable development of the site for an employment generating use and would contribute towards good planning and the sustainable development of the area.

It is respectfully requested that the proposed amendment is taken on board in the final version of the Plan.

Yours faithfully,  
for RPS Group Limited

  
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