

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

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McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS

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<b>Prepared by</b>	Carlos Lara Gonzalez (Executive Planner)	
<b>Checked by</b>	Paula Galvin (Director)	
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	CORK	DUBLIN
6 Joyce House		Kreston House
Barrack Square		Arran Court
Ballincollig		Arran Quay
Cork		Dublin 7
P31 YX97		D07 K271
<a href="http://www.mhplanning.ie">www.mhplanning.ie</a>	T. +353 (0)21 420 8710	T. +353 (0)1 676 6971

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# 1. Introduction

McCutcheon Halley Chartered Planning Consultants have prepared this submission on behalf of our client, the O'Flynn Group (OFG), in response to the public consultation on the Draft South Dublin County Development Plan 2022-2028 (the Draft Development Plan).

OFG welcome the review of the South Dublin County Development Plan and specifically the inter-authority collaborative approach to delivering a Development Framework for the regeneration of the Naas Road lands that straddle South Dublin and Dublin City jurisdictions.

As one of the largest developers in the State and the owner of a strategic 7.33 hectare (approx. 18 acres) brownfield site on Naas Road, OFG are a key stakeholder in shaping the regeneration of this area.



**Figure 1 O'Flynn Group Landholding - Former Nissan Site**

The changing character of the Naas Road lands, from low intensity commercial uses to high-density mixed-use developments, is reflected in the recent permissions for development at the former Nissan site, the Royal Liver site and Concorde. Together these developments would act as a catalyst for the transformation of the area.



**Figure 2 Permitted Developments on former Nissan Site (OFG), Royal Liver Site & Concorde Site**

## 2. O'Flynn Group - Naas Road

### 2.1 Masterplan Former Nissan Site

The O'Flynn Group control the former Nissan site, a landbank of approx. 7.33 hectares (18 acres) with frontage onto the Naas Road, Walkinstown Avenue and Longmile Road. The extant Naas Road Local Area Plan (LAP) required the preparation and submission of a Masterplan with the application.

The Masterplan was developed in close cooperation with Dublin City Council to ensure that it satisfied the vision established in the LAP and the changed policy context arising from the publication of the National Planning Framework and the Eastern and Midlands Regional Spatial Strategy.

The vision for the Masterplan area aligns with the overall LAP vision. Its aim is to;

- Establish a vibrant, diverse, mixed use quarter, of excellent design quality, that is attractive to both occupiers and visitors.
- Create a place with distinct characters where people can work and play and with a well defined home environment, where families can grow.
- Establish a place that is resilient, welcoming, safe, and healthy and that will act as a focal point for the regenerated Naas Road.

The Masterplan provides for a high density mixed use scheme consistent with the national planning objective for compact growth through making the most efficient use of the existing built environment.

To inform the quantum of development for non-residential land uses, the baseline target for the Masterplan was to achieve a proportionate quantum of development established for this Key District Centre, The Former Nissan Plant & Site fronting Long Mile Road.

This KDC occupies an area of 45 hectares and the Masterplan lands are approx. 7.3 hectares. Therefore, the Masterplan share of the individual land use targets is 16.2%. Applying this share would yield the following baseline;

- 16.2% of 40,000sq.m commercial = 6,480 sq.m
- 16.2% of 2,500 sqm community = 154 sq.m
- 16.2% of 12,500 sq.m industrial = 2,025 sq.m

Notably, the retail quantum of 15,000 sq.m is allocated solely to, The Former Nissan Plant & Site fronting Long Mile Road of 12 hectares. The Masterplan lands occupy 61% of this site and so the applicable quantum is 9,150 sq.m.

During preplanning meetings, the planning authority acknowledged that the quantum of retail envisaged is no longer appropriate due to changed circumstances and the Masterplan was developed based on integrating a modest quantum of viable convenience retail to serve the anticipated population of the proposed development and immediate surrounding area.

A comparison between the LAP targets and the quantum of development for each land use proposed in the Masterplan is set out below.

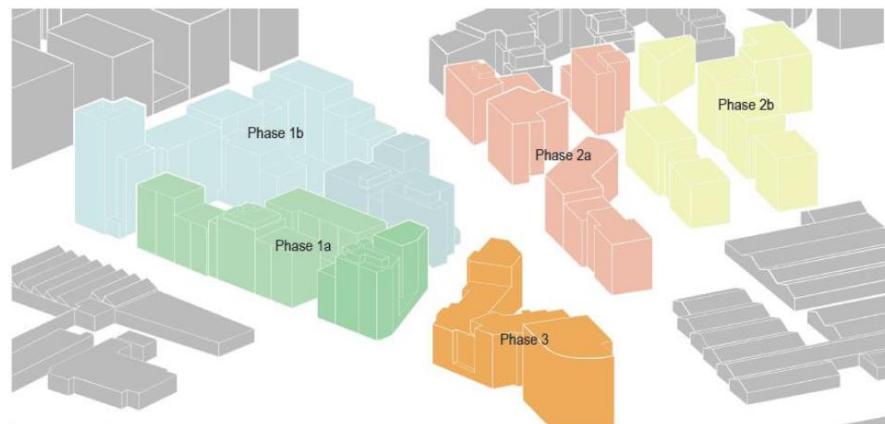
Landuse	LAP Total Target sq.m	LAP Adjusted Target sq.m	Masterplan sq.m	% of Total Target	% of Adjusted Target
Commercial <sup>1</sup>	40,000	6,800	25,577.20	64	376
Community <sup>2</sup>	2,500	425	2,660.75	106	626
Industrial	12,500	2,125	-	-	-
Retail	15,000	9,160	5,509.85	37	60

COMPARISON OF LAP TARGETS WITH MASTERPLAN

1) Commercial - including Hotel & Office  
2) Community - including Primary Health Care, Gym and Cultural Hub

Given that the Masterplan lands comprise 16.2% of the total lands within the KDC, the proportion of proposed non-residential land uses was deemed appropriate. The proposed commercial and community uses significantly exceed the relevant target as a share of the overall KDC lands and the quantum of retail proposed is justified in the context of a significantly changed retailing environment.

The Phases of the Masterplan are illustrated below and Phase 1a, 1b, 2a and 2b have received development consent. A separate application will be prepared for Phase 3.



**Figure 3 Masterplan Phases**

**Recommendation:**

Having regard to the collaborative approach between the O'Flynn Group and Dublin City Council employed during the preparation of this Masterplan, it is submitted that the plan making team for the Development Framework and subsequent Local Area Plan or similar mechanism as identified in Objective CS2 of the Draft South Dublin Development Plan should engage with the O'Flynn Group to consider the optimum land use strategy for Phase 3, having regard to the current work being undertaken by the local authorities.

## 2.2 Approved Development - Southwest Gate (Reg. Ref. 3228/20)

Implementation of the O'Flynn Group planning permission authorised by Dublin City Council (DCC) in 2021 for the development of 'Southwest Gate' will be instrumental in the regeneration of Naas Road and will act as a catalyst for the wider regeneration of the area.



**Plate 1 CGIs of Permitted Southwest Gate Mixed Use Scheme**

The permission (reg. ref. 3228/20) represents one of the most ambitious regeneration mixed-use developments in the Naas Road to date. The development site is an underutilised brownfield site, known as the former Nissan site within DCC's administrative area. The site of approx. 7 hectares (18 acres) occupies a key location at the junction of Naas Road and Walkinstown Avenue.

The permitted scheme comprises a mix of residential, community, commercial and retail uses together with a public park and public square. It is divided into 3 no. character areas;

- i. The **Urban Quarter** comprising Blocks A-E encompasses a broad mix of uses and is strategically located to the northwest of the site to facilitate direct access to the Kylemore Luas stop. Here, the commercial (hotel, office, and retail) social (childcare, primary healthcare centre and gymnasium) and cultural uses (cultural hub) are clustered. Active uses are concentrated on the public square, 'Barnewall Square', and surrounding routes to ensure vitality. Residential is proposed on upper floors to contribute to high levels of natural surveillance. The mix of uses support day and night activity to ensure a vibrant neighbourhood.
- ii. The **Central Park**, 'Biodiversity Park' has a north south orientation and acts as a transition between the Urban Quarter and Residential Neighbourhood. It is designed as a predominantly biodiverse rich, passive space that provide connectivity through the scheme and beyond to the Naas Road and Long Mile Road.

iii. The **Residential Neighbourhood** (Blocks F-L) to the east of the site offers high-quality housing with a wide range of unit sizes set amidst landscaped areas that will offer residents a variety of spaces allowing for a diverse and dynamic environment that can be shared and enjoyed by the whole community.



**Figure 4 Southwest Gate Character Areas**

The scheme would deliver 1,123 new homes with a mixed residential tenure i.e., a combination of Build to Sell, Build to Rent and Social and Affordable homes. The mix of units would accommodate a broad range of occupants from single occupancy households to families.

**Mix of units - 1123 No. Units**

- 146 no. (13%) 1-bedroom (1 person) units
- 368 no. (33%) 1-bedroom (2 person) units
- 528 no. (47%) 2-bedroom (4 person) units
- 81 no. (7%) 3-bedroom (5 person) units

**Table 1 Permitted Unit Mix at Southwest Gate**

The permitted commercial and retail uses are a considered response to the existing and future needs of the area. They include a hotel (148-beds), office accommodation, primary care centre, creche (approx. 140 childcare spaces), local retail, food, and beverage floorspace, a gym and a cultural hub.

It is anticipated that these non-residential uses will generate employment opportunities for approx. 40% of the population that will be generated by the development. This balanced approach to the redevelopment of the site is a commitment to realising both social and economic rejuvenation of the Naas Road.

#### Non Residential

- Hotel – 7,220 sq.m
- Office – 4,940.10 sq.m
- Retail (11 no.) – 2,695.20 sq.m
- Primary Care Centre – 994.30 sq.m
- Creche - 968.95 sq.m
- Cultural Hub – 486.60 sq.m
- Gym – 230 sq.m

**Table 2 Permitted Commercial, Retail & Social Uses at Southwest Gate**



**Figure 5 Permitted Mixed Use Southwest Gate Scheme**

#### **Recommendation:**

Southwest Gate is a permitted mixed-use development. Having regard to the scale of the development together with its location advantage at a critical node on Naas Road, implementation of this permission would act as a catalyst for regeneration of lands within the wider area.

It is important that the plans proposed under Objective CS2 of the Draft South Dublin Development Plan do not affect the delivery of this permission in a timely manner. Phased and sequential development can have unintended consequences in the context of permitted developments, and this must be given full consideration so as not to undermine the timely implementation of Southwest Gate and other local permissions that provide for regeneration opportunities.

### 3. The Naas Road Lands: Plan-Led Regeneration

**Policy CS2 Naas Road/Ballymount Regeneration Lands** and associated policy objectives of the Draft Development Plan gives expression to the Council's overarching strategy for the development and regeneration of the brownfield/infill lands on the Naas Road.

***Policy CS2 - Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council** which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy (emphasis added) (SDCC, 48).*

***CS2 Objective 1 - To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at Naas Road/Ballymount** to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework until such time as a Statutory Plan is in place (emphasis added) (SDCC, 48).*

***CS2 Objective 2 - To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders** including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development (emphasis added) (SDCC, 48).*

Regarding the Council's plans for the regeneration of the Naas Road lands, Chapter 12 of the Draft Development Plan acknowledges that SDCC, in collaboration with DCC, is currently preparing a masterplan for the Naas Road lands. It is further noted that the masterplan will be guided by an integrated land use and sustainable transportation approach in accordance with national and regional strategic planning policy objectives to deliver compact growth.

**EDE4 Objective 10** and **QDP16 Objective 2**, set out in the Draft Development Plan under the overarching **Policy EDE4 Urban Growth, Regeneration and Placemaking** and **Policy QDP16 Framework Plans**, respectively, are also relevant in the context of the plan-led approach to be implemented by SDCC for the future regeneration and growth of the Naas Road lands.

**EDE4 Objective 10** - *To support the Naas Road Masterplan and any future framework for the area in delivering urban growth and regeneration for the County and the wider Region, recognising its significant potential as the largest regeneration area in the country (emphasis added) (SDCC, 338).*

**QDP16 Objective 2** - *To support the Naas Road Strategic Framework plan and any future framework for the area in delivering urban growth and regeneration for the County and the wider Region, recognising its significant potential as the largest regeneration area in the country (emphasis added) (SDCC, p. 207).*

**Comment:**

The Naas Road area represents a unique opportunity to regenerate a significant predominantly brownfield landbank at the edge of the city.

OFG welcome the valuable opportunity arising from preparing a masterplan to unlock these lands and help shape the future of this part of Dublin's metropolitan area. As a key stakeholder within the masterplan's study area, OFG will work with both authorities to ensure that policies and objectives of the Development Framework and subsequent Local Area Plan, Masterplan or similar are fit for purpose and capable of implementation in a timely manner.

## 4. City Edge Project

The O'Flynn Group welcome the recent publication of the City Edge Project and commend South Dublin County Council and Dublin City Council for this significant milestone. We note that the public consultation phase has now commenced and OFG will make a submission within that process.

The most successful regeneration projects in Europe have been characterised by strong local governance, key stakeholder collaboration and a strategic vision that have transformed the image of city's and enhanced their economic position.

As a key stakeholder, the O'Flynn Group are committed to working proactively with both Local Authorities to deliver on the vision set out by the Government for the comprehensive regeneration of the Naas Road area in the National Planning Framework.

Large scale urban regeneration is complex, and this City Edge Project is critical if urban renewal is to be achieved in the Naas Road, Ballymount and Park West area. A great deal of work has been undertaken to establish the baseline environment and investment in vital infrastructure must be prioritised to secure investor confidence .

Regeneration incorporates many different elements, including land, the provision of infrastructure, leadership, and funding. A vision and masterplan are required to put all the pieces together to create a successful regeneration. It is therefore critical for all stakeholders to work in unison with one another, to ultimately achieve the successful transformation of this area. The whole is more than the sum of its parts and so each piece is essential to the success of this regeneration scheme.

The role of the public sector is to create confidence in a regeneration area as an investment location. Urban regeneration projects offer a degree of uncertainty for investors. To compensate this, a clear regeneration framework underpinned by a substantial public sector commitment for the area would provide certainty for investors and would bolster investment confidence. The need for transport infrastructure and utilities along with the public sector's support of public services (parks, public use buildings etc.) is vital to attract investors within urban regeneration areas.

Delivery is critical to investor confidence far beyond the boundaries of the regeneration area. The public sector must deliver on infrastructural commitments, or the risk is that our global competitors will act before us.

## 5. Conclusion

The preparation of the South Dublin County Development Plan 2022-2028 provides a timely opportunity to address and achieve the long-term objectives for the redevelopment and consolidation of the extensive underutilised brownfield lands that exist at the Naas Road, Ballymount and Park West area.

The O'Flynn Group are a key stakeholder in this area, and their land benefits from planning permission for the delivery of a significant quantum of residential and commercial development that when implemented would act as a dynamic catalyst for further urban redevelopment locally.

In summary, we recommend that the Council:

- Actively pursue the proposed policies and objectives set out in the Draft Development Plan regarding the regeneration and redevelopment of the extensive brownfield/infill lands at the Naas Road, Ballymount and Park West area.
- Engage with all relevant stakeholders, including OFG, as part of the plan making process currently being prepared by SDCC in collaboration with DCC for the regeneration of these lands.
- Recognise the planning permissions that exist for the redevelopment of lands at the Naas Road and ensure that in this interim period, i.e., while the Development Framework and subsequent plans are being prepared, that supporting the activation of these permissions is prioritised.