

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

Date: 26th April 2022

Dear Sir / Madam,

RE: SUBMISSION TO THE PROPOSED MATERIAL AMENDMENTS TO THE DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028 IN RESPECT TO LANDS AT ADERRIG AND TOBERMACLUGG, LUCAN, CO. DUBLIN

1.0 INTRODUCTION

- 1.1 On behalf of our client, Hugh McGreevy & Sons and Tierra Ltd, of 223 Mount Prospect Avenue, Clontarf, Dublin 3, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission in respect of the proposed material amendments to the draft South Dublin County Development Plan 2022-2028 (hereinafter Draft Plan), published on the 29th of March 2022.
- 1.2 Our client welcomes the opportunity to make a submission on the draft Plan in the context of their lands at Aderrig and TobermacLugg, Lucan, Co. Dublin which border the Adamstown SDZ (Strategic Development Zone) to the west and north, respectively.
- 1.3 This submission relates to **proposed material amendment no. 2.1 of Chapter 2: Core Strategy and Settlement Strategy**, which relate to housing need and the number of units to be delivered within the 6-year life of the plan.
- 1.4 Our client is a landowner actively involved in the construction of housing in the Adamstown SDZ area, with the resources and capabilities to deliver much needed new homes along with significant social infrastructure on lands adjoining the SDZ, within the lifetime of the new Development Plan.
- 1.5 Our client has a proven ability to deliver much needed housing stock, in conjunction with various landowners and collaboration with South Dublin County Council, as evidenced by their long-term commitment to the delivery of Adamstown SDZ, from its inception in 1998. At present our client is constructing housing on the TobermacLugg lands (Hallwell development) in Development Area 5 of the Adamstown SDZ Planning Scheme and recently brought forward a planning application for the final phase of development (Phase 3 under Reg. Ref. SDZ21A/0023).

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- 1.6 Our client's landholding at Aderrig and Tobermaclugg, with a combined area of c. 55 ha, has the potential to provide over 2,000 homes at a density of 35-40 units per ha. at a location close to a high-quality public transport corridor adjoining the new community of Adamstown, proximate to the established settlement of Lucan.
- 1.7 As this submission will demonstrate, the quantum of residential zoned lands within the County is not sufficient to meet the needs of the future population up to 2028. It is respectfully submitted that the population projections and expected delivery of residential units are unrealistic and the approach to residential zonings should be revisited to prevent a shortfall in residential zoned development land in the County.
- 1.8 The development plan must provide residential zoned land over that predicted by housing supply targets to ensure that, particularly where there are inhibitors in the release of suitable and developable zoned lands, a suitable range of alternate lands can come forward in a rational and organised way in tandem with planned infrastructure delivery.
- 1.9 The interim population growth figures published by the Central Statistics Office indicate a significantly higher level of inward migration, and higher overall population growth than anticipated within the NPF, and it is respectfully submitted that in the interests of proper planning and sustainable development that this needs to be reflected in new development plans being prepared for the Dublin Metropolitan Area.
- 1.10 This submission therefore requests that the Core Strategy section of South Dublin County Development Plan 2022 – 2028 be reviewed within one year of the adoption of the Plan and that the quantum of residential zoned lands be updated to reflect any revised population targets arising from the release of the 2022 Census data.

Submission request

- 1.11 This submission requests that Planning Authority make a commitment in the new South Dublin County Development Plan 2022 – 2028 to review the Core Strategy within one year of the adoption of the new Development Plan and increase the quantum of suitably located residential zoned land in the County accordingly in line with any increase in population growth and targets.
- 1.12 The amended text to be included under Proposed Material Amendment 2.1 would be as follows:

“A one-year review of the Core Strategy section of the Development Plan will be undertaken by the Planning Authority and should there be evidence of the need for further residential zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:

- Analysis of Census 2022 population data and updated regional population projections,*
- Analysis of the type of housing need,*
- Analysis of the appropriate location/s to serve such need, and*
- Relevant National and Regional policy.*

2.0 SUBMISSION TO THE PROPOSED MATERIAL AMENDMENT 2.1

- 2.1 This submission is in respect to proposed material amendment 2.1 of Chapter 2: Core Strategy and Settlement Strategy, which relates to housing need and the number of units to be delivered within the 6-year life of the plan.

- 2.2 The relevant text of proposed material amendment 2.1 is set out in the text box below with our requested amendment included in blue text.

Proposed Material Amendment 2.1

“Taking account of completed units between 2017 and Q3 2021 ~~(5,914 Units)~~ (6,554 Units) plus an estimated delivery of 1600 units between Q3 2021 and Q3 2022 (total of 8,154 Units) there is an overall requirement of ~~17,817~~ 15,576 units between ~~2021-2022~~ and 2028. The Core Strategy (Table 10) demonstrates how this target can be met up to 2028 taking into consideration units under construction. It has been developed by applying a four-step approach to the identification and assessment of lands capable of meeting this housing requirement.”¹

And:

- The housing target for South Dublin County, as set by Ministerial Guidelines and the NPF Road Map, is ~~17,817~~ 15,576 homes up to 2028.
- ~~Of this there are currently 4,557 homes under construction, thereby reducing the need to 13,260 homes up to 2028.~~
- The Council has assessed all appropriately zoned lands with the potential for residential development and has applied a residential density for each site in line with Ministerial Guidelines.
- Informed by this work, there is a total Land Capacity of ~~1,039ha~~ 990ha with the potential for ~~44,472~~ 42,570 units. However, by excluding Long Term Strategic Lands, the land capacity reduces to ~~477~~ 428 ha with the potential to accommodate ~~23,731~~ 21,490 units.
- An Infrastructure Assessment was carried out in preparation of the Plan for these lands in 2021 which identified ~~to identify~~ the capacity of lands in Tier 1 (i.e. zoned and serviced) which had a total of 11,597 homes and in Tier 2 (i.e. zoned and serviceable within the lifetime of the plan) which had a total of 12,133. Based on known construction activity and estimated delivery up to Q3 2022 the total capacity of Tier 1 and Tier 2 lands is 21,490 units over the Plan period.
- A further Planning and Deliverability assessment was carried out across the Tier 1 and 2 lands and confirmed sufficient capacity to meet the total housing target set for the County.
- Based on above – the core strategy identifies that there is no requirement to zone additional lands to meet population or housing targets”²(emphasis added)
- The Planning Authority will review the population and housing targets for South Dublin County, as set by Ministerial Guidelines and the NPF Road Map, is ~~17,817~~ 15,576 homes up to 2028.
- A one-year review of the Core Strategy section of the Development Plan will be undertaken by the Planning Authority and should there be evidence of the need for further residential zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:
 - Analysis of Census 2022 population data and updated regional population projections,
 - Analysis of the type of housing need,
 - Analysis of the appropriate location/s to serve such need, and
 - Relevant National and Regional policy.

¹ Material amendments to the Draft South Dublin County Development Plan 2022-2028, pg. 28

² Material amendments to the Draft South Dublin County Development Plan 2022-2028, pg. 29

3.0 JUSTIFICATION FOR PROPOSED AMENDMENT OF PROPOSED MATERIAL AMENDMENT 2.1

- 3.1 As set out in the text above, proposed material amendment 2.1 of the Draft Plan as it relates to the housing need and capacity for South Dublin County, identifies a need for 15,576 housing units between 2022 and 2028, calculates that the total residential zoned lands have the potential to accommodate 21,490 units within the lifetime of the plan, estimates delivery of 21,490 units over the Plan period and based on this estimation, concludes that there is no requirement to zone additional land to serve the needs of population and meet housing targets.³
- 3.2 Therefore, the decision not to zone any additional residential lands is predicated on the assumption that 100% of the residential zoned lands will be delivered within the lifetime of the new plan. It is respectfully submitted that the evidence shows that approximately only half of sites with permission are activated at any given time and that a grant of permission does not guarantee delivery of housing units as development is dependent on a range of external factors and often permissions may not be implemented at all during their lifetime.⁴
- 3.3 We respectfully submit that this approach to residential zoning will further exacerbate housing shortage issues and should be reviewed. By basing the decision on the quantum of residential lands to be zoned solely on the housing capacity of existing undeveloped zoned land, the Planning Authority fails to take into account their own findings in relation to other factors which affect housing delivery clearly set out in the Draft County Development Plan such as:
- Development challenges associated with brownfield lands, including contamination, landownership and site assembly, phasing and sequencing;
 - The fact that approximately half (51%) of sites with permission are activated at any given time while the remainder may take time to commence based on a range of factors (e.g. raising of funding, potential market changes) or that permissions may not be implemented at all during their lifetime;⁵
 - Larger developments (SHDs) comprise a significant element of permitted units throughout the County and since commencement of the SHD process in 2017 delivery has been limited with only 11% of the permitted SHDs being implemented up to Q3 2020;⁶
 - The development of the existing identified strategic lands will require significant investment and site assembly to enable the full development potential and this will take time.⁷ In this regard, it is noted that the Strategic Development Zone lands at Clonburris have at least a 10 to 15 year delivery timeframe to completion.
- 3.4 Therefore, given the above, it is unclear how the Planning Authority can conclude that 21,490 units could be potentially delivered over the next 6 years on the same lands zoned since 2016 when the annual rate of construction between 2017 and 2020 inclusive was on average 1,479 units a year within the last three years

³ *Material amendments to the Draft South Dublin County Development Plan 2022-2028, pg. 29*

⁴ *Draft South Dublin County Development Plan 2022-2028, pg. 52*

⁵ *Draft South Dublin County Development Plan 2022-2028, pg. 52*

⁶ *Draft South Dublin County Development Plan 2022-2028, pg. 52*

⁷ *Draft South Dublin County Development Plan 2022-2028, pg. 47*

averaging 1,644 units. Even at the higher output rate, this equates to less than 10,000 units over 6 years.

- 3.5 As commented upon by the Deputy Regulator of the OPR, Anne Marie O'Connor, in a discussion on land zoning and the delivery of housing, the statistics in terms of delivery on zoned land ***"are absolutely shocking. There is a one in six chance a piece of zoned land will come forward for development in its planned period."***⁸ (Emphasis added)
- 3.6 It is respectfully submitted that the housing need for the County up to 2028 will not be met without the zoning of additional lands for residential development in the new County Development Plan and additional residential zoned lands are required to meet population and housing targets up to up to 2028 and beyond.
- 3.7 To ensure the orderly development of the County, the Planning Authority must take account of the time lag between the zoning of lands, the activation of permissions and the actual delivery of actual housing units, and as outlined above, the fact that often permissions may not be implemented at all if they are to prevent an undersupply of housing within the lifetime of the new Plan.
- 3.8 The Planning Authority must revisit their decision in respect of the zoning of additional residential lands within the County. Housing delivery on undeveloped lands closest to existing services and public transport routes, carefully co-ordinated with infrastructure investment, commensurate with the achievement of compact urban development, should have the greatest level of prioritisation in the zoning of land.
- 3.9 The development plan must provide residential zoned land over that predicted by housing supply targets to ensure that, particularly where there are inhibitors in the release of suitable and developable zoned lands, a suitable range of alternate lands can come forward in a rational and organised way in tandem with planned infrastructure delivery.
- 3.10 Our client's lands at Aderrig and Tobermaclugg are located immediately west and north of Adamstown SDZ as shown in the maps presented at Figure 1 and Figure 2 of Appendix 1. The lands are proximate to the established settlement of Lucan and located on the South Western Corridor (western suburbs), an identified strategic corridor set out in the MASP integrated land use and transportation strategy.⁹ Key points to note in this regard are as follows:

- Adamstown and adjoining lands are identified in the EMRA RSES as part of the 'South-West Corridor' forming part of the Metropolitan Area Strategic Plan where strategic residential and employment development is to be targeted in order to achieve compact sustainable and sequential growth;

The lands are located close to the Dublin to Kildare Rail Line, which is part of the DART+ Programme to deliver electrified services from Hazelhatch / Celbridge to the City Centre, and therefore new housing in this area would accord with the policy of integrating land use and transportation;¹⁰

⁸ Speaking at a Dublin City Council housing seminar, April 2022

⁹ Draft South Dublin County Development Plan 2022-2028, pg. 37

¹⁰ Draft South Dublin County Development Plan 2022-2028, pg. 37

- The lands form a natural and logical extension of the Adamstown SDZ area and their future development would capitalise on the significant and on-going investment in physical, social and community infrastructure in the SDZ area;
- They offer c. 55 ha area of green-field lands within SDCC and the Dublin Region which do not contain any significant constraints in respect to the future delivery of residential development which are capable of being developed within the six year plan period;
- It is considered that due to the significant investment in Adamstown Train Station as part of the Kildare Rail Project and the Adamstown SDZ, and the medium to longer-term objective to deliver a Dart type service from Hazelhatch to the City Centre, to not develop the subject lands would be a missed opportunity.

4.0 CONCLUSION

- 4.1 It is respectfully requested that the Planning Authority have regard to the points raised in this submission to ensure that the quantum of residentially zoned lands in the County adequately provides for the delivery of the number of housing units to meet the needs of the population up to 2028. Our clients, who are actively involved in housing delivery in the County, can continue to contribute to housing supply in the County, if facilitated by the appropriate zoning designation on their lands at Aderrig and Tobermaclugg, Lucan, Co. Dublin.
- 4.2 This submission therefore requests that Planning Authority make a commitment in the new South Dublin County Development Plan 2022 – 2028 to review the Core Strategy within one year of the adoption of the new Development Plan and increase the quantum of suitably located residential zoned land in the County accordingly in line with any increase in population targets arising from the release of the 2022 Census data which, given the interim population growth figures published by the Central Statistics Office, is likely to demonstrate that greater population growth must be factored into new Development Plans for the Dublin Metropolitan Area.
- 4.3 As outlined above, this submission specifically requests that the following text be inserted under Proposed Material Amendment 2.1:

“A one-year review of the Core Strategy section of the Development Plan will be undertaken by the Planning Authority and should there be evidence of the need for further residential zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:

- ***Analysis of Census 2022 population data and updated regional population projections,***
- ***Analysis of the type of housing need,***
- ***Analysis of the appropriate location/s to serve such need, and***
- ***Relevant National and Regional policy.***

- 4.4 We trust this submission will be taken into consideration in the preparation of the finalised County Development Plan. Please do not hesitate to contact us should you require any clarification of the documentation enclosed.

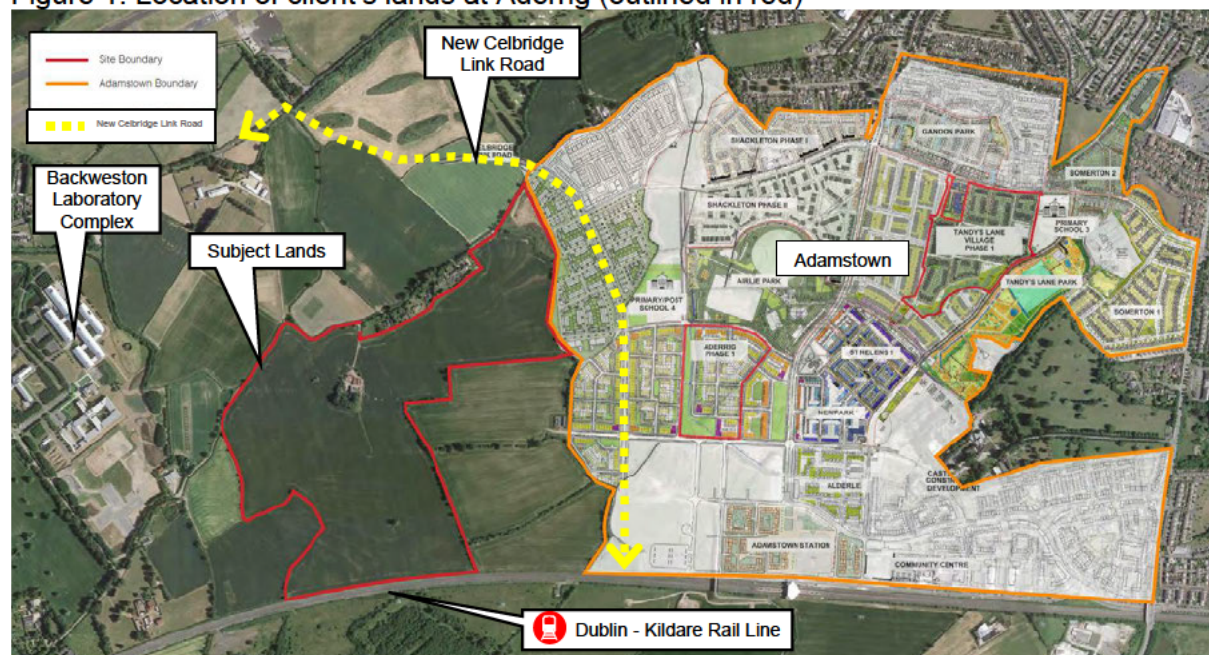
Yours faithfully,



John Spain Associates

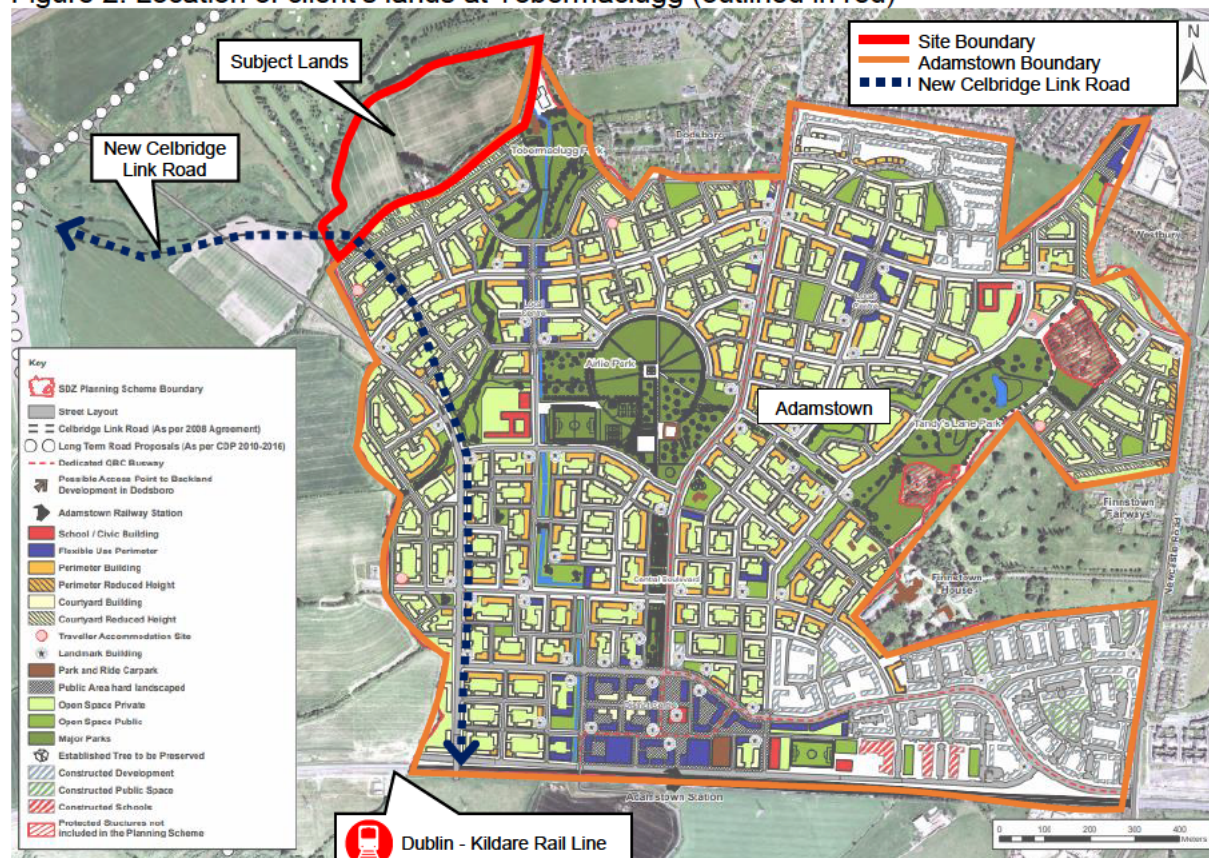
APPENDIX 1- ADERRIG AND TOBERMACLUGG LANDS

Figure 1: Location of client's lands at Aderrig (outlined in red)



Source: Davey Smith Architects and JSA

Figure 2: Location of client's lands at Tobermaclugg (outlined in red)



Source: Adamstown SDZ, Davey Smith Architects and JSA