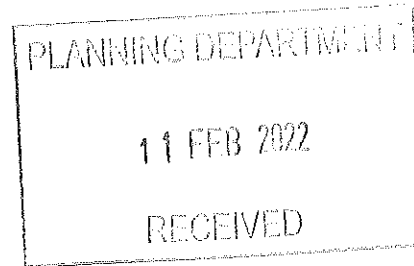


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Dublin City Council  
Development Plan Team,  
Planning and Property Development Department,  
Dublin City Council,  
Wood Quay,  
Dublin 8

Date: 11<sup>th</sup> February 2022

**RE: SUBMISSION ON DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028 IN RELATION TO LANDS AT ST. MICHAEL’S COTTAGES, HOLE IN THE WALL ROAD, DONAGHMEDE, DUBLIN 13**

**1.0 INTRODUCTION**

- 1.1 This submission is made on behalf of our client, Dalton Brokers, 44 Corrán Lorcáin, Seantrabh, Baile Átha Cliath. D09 DC63, who is the appointed advocate for the Owners of St Michael’s Cottages properties at, The Hole in the Wall Road, Dublin 13
- 1.2 Our client represents the existing landowners at St. Michael’s Cottages, as outlined in red in Figure 1 in Section 2 below.
- 1.3 Our client has co-ordinated a development agreement between the landowners included within the red line identified on the St. Michael’s Cottages site, as identified overleaf, with such development agreement providing the basis for a family orientated residential scheme on the site.
- 1.4 In the context of the emerging Dublin City Development Plan 2022 – 2028, we wish to inform the City Council of this emerging residential development site at St. Michael’s Cottages and invite the Council to review the policy context for the site to be included in the new City Development Plan, in light of the forthcoming residential scheme.

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## 2.0 SITE LOCATION / CONTEXT

- 3.0 The roughly triangular site measuring circa 2.7 hectares (6.6 acres) is located to the west of Hole in the Wall Road and north of an existing 6 storey apartment building 'New Priory' which addresses 'Main Street Boulevard', an east west street connecting Belmayne to the west with Clongriffin Dart Station to the east. To the west is a duplex designed residential scheme in Parkside and to the south west of St Michael's Cottages is the new mixed application for Parkside 5B with heights and density ranging from 9 storeys to 6 to 1 storeys (Ref: SHD0024/21), with a decision from An Bord Pleanala due in March 2022.
- 3.1 Currently, the site is occupied by a number of primarily single storey detached and semi-detached dwellings. The St Michael's Cottages site is underutilised and considering the level and scale of residential development directly to the south, west and north of the site, it is incongruous with the surrounding area.

**Figure 1: Approximate Site Location**



Source: Google Maps

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- 3.2 The St. Michael's Cottages site is extremely well located in terms of access to three different public transport nodes.
- It is a c.5-10 minute walk across the park to Clongriffin Dart Station to the east. (A Park and Ride facility has also been developed adjacent to the train station).
  - St Michael's Cottages is also adjacent to the Malahide/Portmarnock QBC on the newly extended North South distributor Rd to Portmarnock & Malahide, with the no. 15 bus running alongside the entire eastern boundary of St Michael's Cottages.
  - In addition, in May of last year the first of the BusConnects spine routes commenced from a terminus at the Clongriffin DART with 3 new bus routes (D1, N8, and L80) which also service St Michael Cottages at its south east corner at the Boulevard. Which provide regular services between Clongriffin, City Centre and Ballycullen in south west Dublin.
- 3.3 The North Fringe Sewer and North Fringe Watermain infrastructural projects have been completed and the existing road network has been developed as part of the wider regeneration of the Belmayne / Clongriffin area, meaning that key infrastructural services for the St Michael's Cottages are in place.
- 3.4 Furthermore, Father Collins Park, a 20 hectare (52 acre) public open space, is located immediately adjacent east of the St Michael's Cottages site.
- 3.5 St Michael's Cottages is therefore strategically located close to public transport and existing infrastructure and meets all the key criteria for high quality and higher density residential development, economic and leisure facilities.

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**Figure 2: Site Context**





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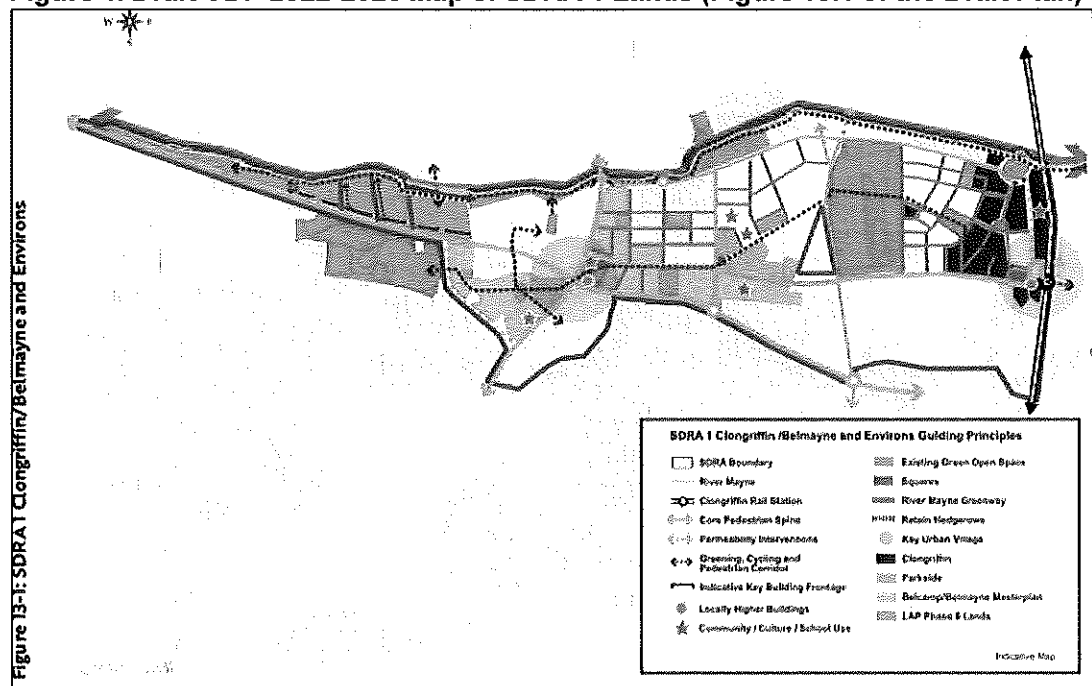


- 4.4 The Development Plan notes that “Z14 areas are capable of accommodating significant mixed-use development; therefore, developments must include proposals for additional physical and social infrastructure/facilities to support same”.
- 4.5 St. Michael’s Cottages also falls within the Clongriffin—Belmayne Local Area Plan, adopted 2012 and extended to December 2022.

**Emerging Policy Context**

- 4.6 In the Draft Dublin City Development Plan 2022-2028 (Draft CDP), the site remains as part of SDRA 1 (North Fringe, including Clongriffin/Belmayne), see Figure 4 with site outlined in red.

**Figure 4: Draft CDP 2022-2028 Map of SDRA 1 Lands (Figure 13.1 of the Draft Plan)**



- 4.7 The Draft CDP sets out the guiding principles for the development of Clongriffin / Belmayne regarding Urban Structure, Land Use & Activity, Height, Design and Green Infrastructure. The Draft CDP notes that the rationale for designating Clongriffin-Belmayne as an SDRA is to provide a strategic spatial and urban design framework, so

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that the objectives of the CDP can guide future development; and to ensure that the phasing and implementation strategy envisaged in the LAP can be delivered as part of the future build-out of the lands, when the LAP expires.

- 4.8 No specific mention is made in the Draft Development Plan to the St. Michael's Cottages site and although included within the wider Z14 zoning, the development potential of the site is not specifically identified in the Draft Plan. This is reflective of its current developed nature.
- 4.9 As we will come on to discuss in the next section, the St. Michael's Cottages site is available for residential development in the next Development Plan period and should be included for such in the CDP 2022-2028.

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## **5.0 THE OPPORTUNITY AT ST. MICHAEL'S COTTAGES**

- 5.1 St. Michael's Cottages is currently wholly underutilised being of an extremely low density at 0.12 per hectare in circa 2.7 hectares (6.6 acres).
- 5.2 In both the existing City Development Plan and the Clongriffin-Belmayne Local Area Plan, St. Michael's Cottages is treated in a 'neutral' manner, in that it is not specifically identified for development. This is reflective of its current developed nature. However, in light of the development agreement which is now in place for the comprehensive redevelopment of the St. Michael's Cottages, it is considered appropriate that the new City Development Plan addresses St. Michael's Cottages in a more specific manner.
- 5.3 The St. Michael's Cottages site, which extends to circa 2.7 hectares (6.6 acres), is strategically located and central to contribute to housing need within the SDRA 1 (and greater Dublin City) area. The lands have the potential to provide a high quality development as part of a planned and co-ordinated residential community well integrated with the pattern of development in the Belmayne – Clongriffin Area.
- 5.4 A Site Analysis Diagram has been prepared by Darmody Architecture to support this submission (see **Appendix A**) which establishes the key principles for a future residential development at St. Michael's Cottages. It demonstrates how St. Michael's Cottages would be developed to provide not only residential development (including social/affordable housing) but some ancillary/subsidiary commercial floor space, and improved pedestrian connections to the neighbouring area in a sensitive manner to the surrounding built form.
- 5.5 Considering its strategic location in the centre of the SDRA 1 area, we consider it prudent that St. Michael's Cottages be identified by the City Council for appropriate residential development in the CDP 2022-2028.
- 5.6 We respectfully request the City Council to give consideration to the following specific points for inclusion in the new City Development Plan. The St. Michael's Cottages site is considered to present an excellent opportunity for residential development for the following reasons:
- St. Michael's Cottages is capable of development within the short-medium term with all landowners committed to its future development;
  - St. Michael's Cottages is sustainably located within the built up area of Donaghmede and supports to concept of 'Compact Growth';



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- St. Michael's Cottages is very well connected:
  - Close to Clongriffin DART station/park & ride facilities
  - 50 metres from a frequent Dublin BusConnects service
  - On a QBC running North/South along its entire Eastern boundary
  - Within walking distance of numerous shops, services and amenities.
- St. Michael's Cottages abuts the 'Belmayne' development and would integrate with the neighbouring residential sites to the immediate west and south;
- There is excellent infrastructure serving the lands:
  - The Hole in the Wall Road is a good standard two lane road, with footpaths and cycle lanes on both sides providing excellent access to Father Collins Park
  - Existing foul and surface water infrastructure
  - Electricity and broadband capacity
- There are no known constraints on the site which preclude its suitability for residential use:
  - No protected structures or archaeological features.
  - No constraints due to proximity to other sensitive receptors.
  - No history of flooding.

5.7 It is of significant importance to note that the 'Development Plans Guidelines for Planning Authorities (Draft for Consultation August 2021) state at Section 6.2.1 that:

*"It is recommended that in most cases, that land-use zoning decisions should not be deferred to subsequent local area plan processes. This is to avoid a scenario whereby the development plan core strategy may be subject to challenge and effectively undermined in a separate statutory process.*

*Accordingly, land-use zoning should principally be undertaken as part of the development plan process in tandem with the preparation of the directly-related core and settlement strategies, informed by a Settlement Capacity Audit".*

5.8 It is therefore respectfully submitted that it is incumbent of the new Dublin City Development Plan 2022 – 2028 to address the emergence of the St. Michael's Cottages site as a redevelopment site.

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5.9 We request that the Council considers the following material amendments to the draft Plan:

- Figure 13.1 relating to SDRA 1 is updated to recognise/acknowledge the development potential of the St. Michael's Cottages site.
- Consideration be given as to whether the St. Michael's Cottages should be identified on Figure 13.1 as a location for a taller building, considering its location directly opposite Father Collins Park, in particular.
- Consideration is given to the inclusion of the Site Analysis Diagram for St. Michael's Cottages (attached at Appendix A).

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## **6.0 CONCLUSION**

- 6.1 This submission is submitted on behalf of the owners in respect of their land interests at St. Michael's Cottages, Hole in The Wall Road, Donaghmede, Dublin 13.
- 6.2 It is respectfully requested that the St. Michael's Cottages lands are specifically identified for redevelopment for a residential led development as part of the SDRA 1 site in the Dublin City Development Plan 2022-2028.
- 6.3 In the Draft CDP 2022-2028, St. Michael's Cottages, which currently comprises very low density residential development, is not specifically identified for future development. The site is situated in a sustainable location for development and has no known planning constraints. It has the ability to be delivered early in the Development Plan period.
- 6.4 We would be grateful if you could please confirm receipt of this submission. Going forward we welcome the opportunity to participate in all stages of the plan making process and we request that this submission be given full consideration in preparation of the forthcoming CDP.

Yours faithfully,

*Robert Keran*

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**Robert Keran,**  
*BSc Spatial Planning, BA (Law), LLB, MIPI*  
**Virtus**



**APPENDIX A:**  
**Site Analysis Diagram**

Site Analysis Diagram

