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01 February 2022

**Submission on Proposed Draft Dublin City Development Plan 2022-2028
Map G: Site at Kimmage Road West**

Dear Sir/Madam,

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed by Mr. Ben Dunne of [REDACTED] to lodge this formal submission to Dublin City Council in relation to the Dublin City Draft Development Plan 2022-2028.

The submission is specifically related to the proposed Map G2: Site at Kimmage Road West and the zoning of the land within this boundary. Please find further details in the attached submission prepared by Brock McClure Planning and Development Consultants.

We confirm that we act for Mr. Ben Dunne, [REDACTED] and request that all future correspondence in relation to this matter be directed to this office. If you have any queries please contact me directly.

Yours sincerely,



Matthew McRedmond
MRUP MIP1

[REDACTED]

[REDACTED]



Draft Development Plan Submission



**On behalf of Ben Dunne, Castleknock,
Co. Dublin**

01 February 2022

**Brock
McClure**

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1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed by our client Mr. Ben Dunne, [REDACTED] to make this submission to Dublin City Council in response to the Draft Dublin City Development Plan 2022-2028, which is currently on public display.

Our client specifically wishes to comment on the proposed Map G of the Draft Plan in relation to the subject site at Kimmage Road West. The proposed Dublin City Council Draft Plan seeks to retain the Z9 zoning (Amenity/Open Space Lands/Green Network) for the existing leisure club and art gallery on the subject site.

The main objective of this submission is to highlight the inconsistency in maintaining the zoning of the leisure club and former art gallery lands as Objective 'Z9'. We note the existing residentially zoned lands to the north of the subject site that we understand will be the subject of a significant residential planning application in the near future. It is submitted that a more appropriate and holistic approach would be to re-zone the subject lands to **'Z10 – Inner Suburban and Inner City Sustainable Mixed Use'** to allow an overall development strategy for these lands to be progressed that would complement the residential zoned land and maximise the use of available land in the metropolitan area.

This would allow for an integrated set of land uses for a well-located site that complies with relevant compact development and brownfield development objectives. The gym use at this location is ongoing and is intended to be maintained in the future. It is envisaged that this use would be incorporated into an overall development strategy for the lands that would realize the potential of an underutilized site and maximise the provision of critical mass to surrounding services, amenities and infrastructure.

We conclude that the Z9 zoning of the gym and former art gallery is no longer appropriate and should be amended in the forthcoming Dublin City Development Plan 2022-2028.

2 Subject Site

This submission relates generally to a 2.21-hectare parcel of land at Kimmage Road West, Dublin 12 which is partly occupied by a leisure centre and associated car park with a former art gallery that is vacant. For clarity, this submission refers to the leisure centre and art gallery lands with the residential zoned land now in separate ownership.

The overall site is as outlined in red in the site aerial below.



Figure 1: Site Location

The Planning Authority will be aware that the lands generally comprise a leisure centre and car park with a separate tract of currently vacant land (approximately 1.5 hectares and zoned residential) located to the rear. There is an existing vacant building on site known as 'The Nora Dunne Gallery'. The building is part two storey and is set on landscaped grounds with an associated car parking area accessed via the main route off Kimmage Road West.

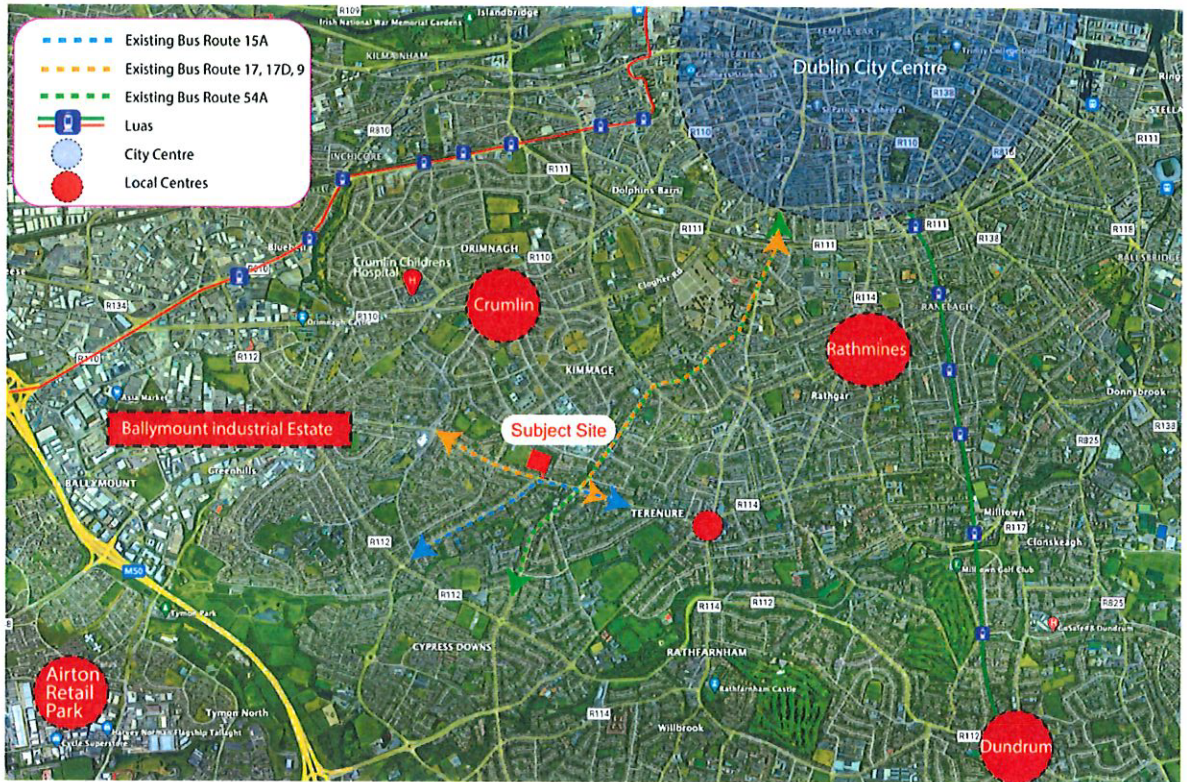
2.1 Site Location

The site comprises an area of approximately c. 2.21 ha and is generally located to north of Kimmage Road West; to the east of residential development at Brookfield; north of residential development along Captain's Road; and to the east of Lorcan O'Toole Park.

The site is served by a number of bus services along Kimmage Road West and Terenure Road to the east of the subject site highlighting the accessibility of the site and suitability of the subject site for a more intense format of development. A number of spine and orbital bus routes in the new bus connects programme will also run adjacent to the site.

The site is easily accessible from the M50 Motorway and via sustainable modes including cycle routes and bus routes, 9, 15A, 54A, 17 and 17D that serve a range of locations including the City Centre, Tallaght, UCD, Blackrock and local centres such as Rathmines.

There are a number of large employment centres in close proximity to the site also, including the Crumlin Business Centre and KCR industrial Estates in the immediate locality as well as the Crumlin Children’s Hospital to the north west, Ballymount Industrial estate and Broomhill Industrial estate and Airton Retail Park to the west of the M50 and the City Centre 3 – 4km to the north east. The connectivity of the subject site will only be enhanced by the future bus connects network and this should be considered in the future planning of this opportunity site. The existing context for the subject site in relation to surrounding key public transport services and surrounding locations is shown below.



Existing Site Context

The site includes the existing active gym and leisure centre use with a former art gallery building, that is currently vacant.

3 Rationale for Re-zoning Subject Lands

The proposed Draft Dublin City Development Plan 2022-2028 proposes to retain the existing zoning for the subject site which includes the Z9 – Amenity/Open Space Lands/Green Network zoning for the existing leisure club and art gallery and a Z1 – Sustainable Residential Neighbourhoods zoning for the access road that serves the subject site and a 1.5ha strip of land along the northern and eastern boundary of the site which is also zoned residential.

The zoning for the site as it exists in the current City Development Plan 2016-2022 and that is proposed to be maintained in the Draft Dublin City Development Plan 2022-2028 is illustrated below.

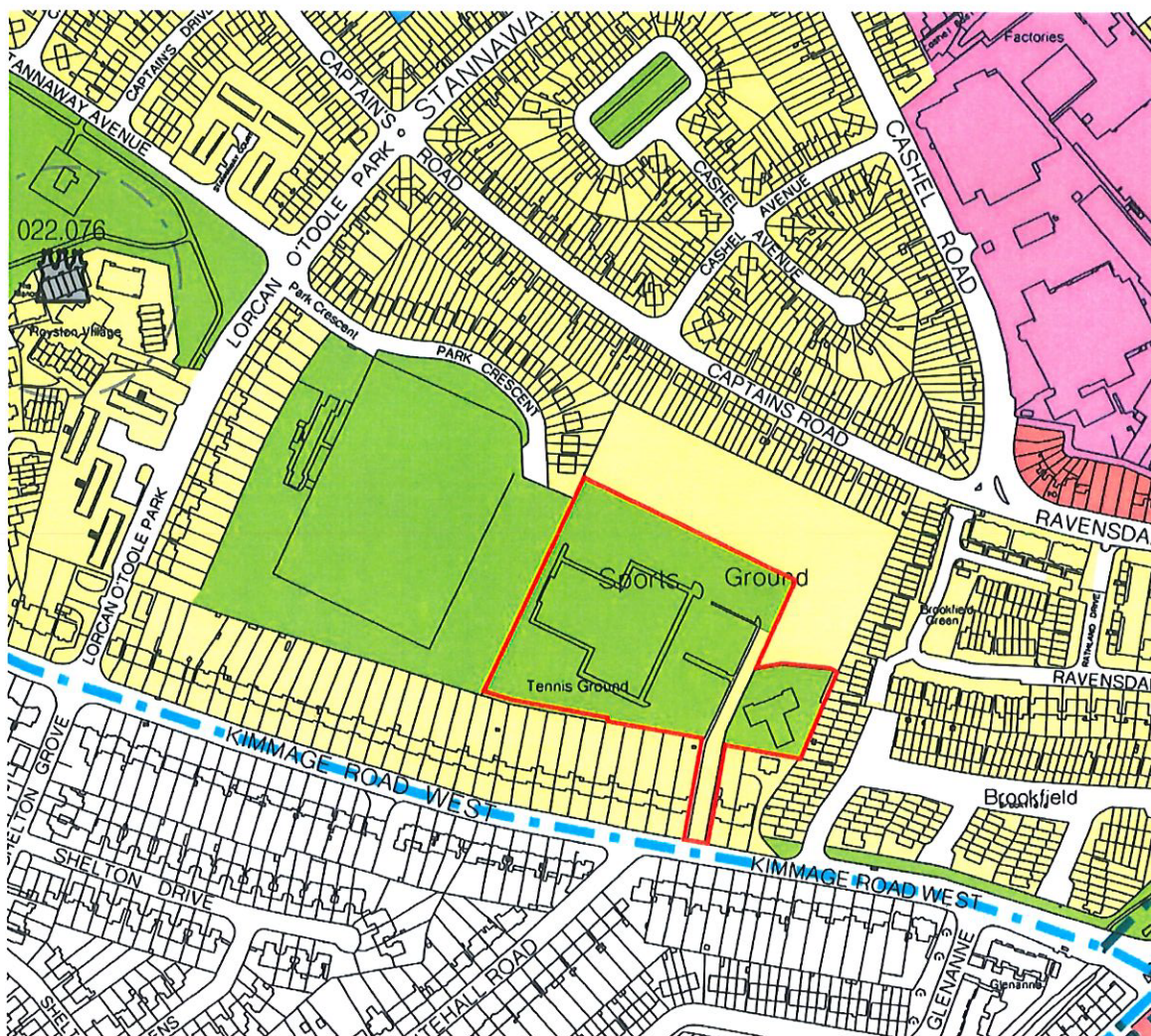


Figure 2: Proposed Zoning as Per DCC Draft Development Plan 2022-2028 (no change from existing)

In this regard, we very much see this as a missed opportunity for the zoning of this site, which is ideally located within 4km of the City Centre and a range of services, amenities and employment locations in the surrounding vicinity. The subject site is ideally suited to a comprehensive re-development to maximise the use of scarce development land within the Metropolitan Area, which is consistent with national and regional policy objectives.

This is a commercial brownfield site, well located to provide facilities and services to meet the needs of the surrounding resident population. Maintaining the Z9 zoning objective on the former art gallery lands and the Gym/Leisure Centre lands prevents the opportunity for the existing buildings to form part of an integrated development solution for the site. It is important that the site is re-zoned to facilitate the delivery of viable uses, as the former art gallery use is no longer sustainable and the residential zoned land adjacent will be subject to a planning application in the near future.

It is submitted that were the zoning of these lands changed from Z9 to Z10 – Inner Suburban and Inner City Sustainable Mixed Uses, a holistic development proposal for the overall site could be brought forward to incorporate a range of uses including residential, leisure uses (existing), café, creche and other

facilities to create an integrated neighbourhood in line with “15-minute City” Objectives. This would allow the subject site to be integrated with the residential site immediately adjacent.

There is simply no market for a dedicated art gallery at this location and the building would only be at risk of dereliction if the current vacancy were to remain for the next 6 years. It is now timely and appropriate to expand the potential uses that are considered acceptable for these lands and we ask the Planning Authority to look closely at the suitability of the subject site for a Z10 zoning. We submit that the re-zoning to Z10 would enable a planning application for a change of use to be considered on its merits by the Planning Authority.

It is our considered view that a mixed use development proposal can be accommodated on the subject site without impacting negatively on the amenity of established residential and non-residential uses in the vicinity. The site is well served by public transportation, close to local services and amenities and is in an already established residential area. There are ample uses provided under the Z10 objective that would be of benefit to the wider community at this location in comparison to the underutilised and partially vacant nature of the site at present.

We remind the Planning Authority that the subject lands are brownfield commercial lands and not amenity open space, as the land use zoning suggests. The Z9 designation is therefore both inconsistent and inappropriate. Furthermore, the retention of the Z9 zoning on the art gallery lands leaves this portion of the site as an isolated and effectively unusable portion of open space/amenity lands. To view the amended land use zoning map as currently proposed by DCC looks like an anomaly in land use zoning terms.

The Draft Plan states that the vision for residential development in the city is one where a wide range of accommodation types are available within sustainable communities where residents are within easy reach of services, open space and facilities such as shops, education, leisure, community facilities and amenities, on foot and by public transport. The proposal to rezone the vacant portion of this site to Z10 is therefore consistent with the objectives of the Draft Development Plan.

The proposed rezoning of the art gallery and leisure centre portions of the site would facilitate the development of a type of accommodation and associated uses in close proximity, which is currently lacking in this area of the City and would provide for a sustainable land use allowing the local population to be housed and cared for within their own community at all stages of their lives.

3.1 Z10 Zoning Provisions

The objective of the Z10 Zoning is to “consolidate and facilitate the development of inner city and inner suburban sites for mixed uses”.

The purpose of the Z10 Zoning is to promote mixed use in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. While the subject site currently consists of an active gym/leisure use in the existing gym, the remainder of the site is vacant (Z9 – Gallery building). It is intended that the gym/leisure use will continue to operate at this location but a Z10 zoning for the overall site would allow an integrated, mixed-use development proposal to be brought forward to maximise the use of available land at this brownfield site.

We note that:

“In order to ensure that a mixed use philosophy is adhered to on Z10 zoned lands, the focus will be on delivering a mix of residential and commercial uses and there will be a requirement that a maximum of 70% of a Z10 zoned site can be given to one particular use, with the remaining portion of the site (30% or greater) to be given over to another use or uses (e.g. residential or office/employment).”

The primary uses that would be considered appropriate for the subject site would be residential (in line with the existing residential zoning adjoining), sports facility (in line with the existing gym and neighbouring open space/sporting lands), creche, café, medical centre and other commercial facilities/small scale offices. These would be uses that could effectively support the local population and would be an appropriate utilisation of a well-located brownfield site.

The requirement for a masterplan on Z10 zoned lands greater than 0.5ha in size is also noted and welcomed. The subject site is an overall 2.21ha land bank, in single ownership, which would facilitate a cohesive development strategy for the site with a high level of certainty associated with any Masterplan proposal brought forward. Any masterplan proposal could also serve to successfully integrate with any future residential development on the currently vacant Z1 zoned lands.

3.2 Draft Dublin City Development Plan 2022-2028 – Brownfield Land

Section 15.1 of the Draft City Development Plan notes a number of national and regional policy objectives that are relevant to the subject site and the future zoning of these lands.

“NPO 6, 13 and 35 and RPO 4.3 and 5.4 specifically encourage the rejuvenation of urban areas reutilising existing buildings and brownfield sites for increased heights and densities subject to compliance with a series of qualitative assessments.”

The vacant gallery building, and the available land surrounding the leisure centre are ideal lands that are suitable for regeneration to the benefit of the wider community. Section 15.5.1 specifically relates to “Brownfield, Regeneration and Large-Scale Redevelopment Sites”. The following is stated:

“Brownfield sites are generally referred to as previously developed lands that are not currently in use. Quite often these brownfield sites are located in areas in need of regeneration. These sites often contain derelict or vacant buildings which are underutilised and in need of redevelopment. Brownfield lands have the ability to regenerate and rejuvenate large portions of the city through redevelopment.”

Several considerations are identified for large scale, brownfield sites that can be applied and facilitated at the subject site:

“• To encourage innovative, high quality urban design and architectural detail in all new development proposals.

- To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.*
- To respect and enhance existing natural features of interest.*
- To contribute to the streetscape creating active and vibrant public realm.*
- To create animation and create activity at street level and vertically throughout the building.*
- To provide for appropriate materials and finishes in the context of the surrounding buildings.*
- To ensure land contamination is appropriately dealt with and mitigated against.*
- To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.*
- To create new compositions and points of interest.*
- To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community-and/or employment generating uses to improve the existing range of uses and facilities in the area.*
- To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.*
- To prioritise pedestrian and cycle movements in connection with public transport infrastructure.*
- To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.*
- To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.*
- Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood”*

Overall the subject site presents very suitably in the context of the Z10 Zoning as it is a brownfield site with a vacant building that could contribute significantly to the regeneration of the area, provide crucial housing supply and maximise the existing gym and leisure facility at this location.

Policy **QHSN8** is noted in relation to active land management:

“To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.”

Policy QHSN10 in relation to the 15 minute City is also specifically noted:

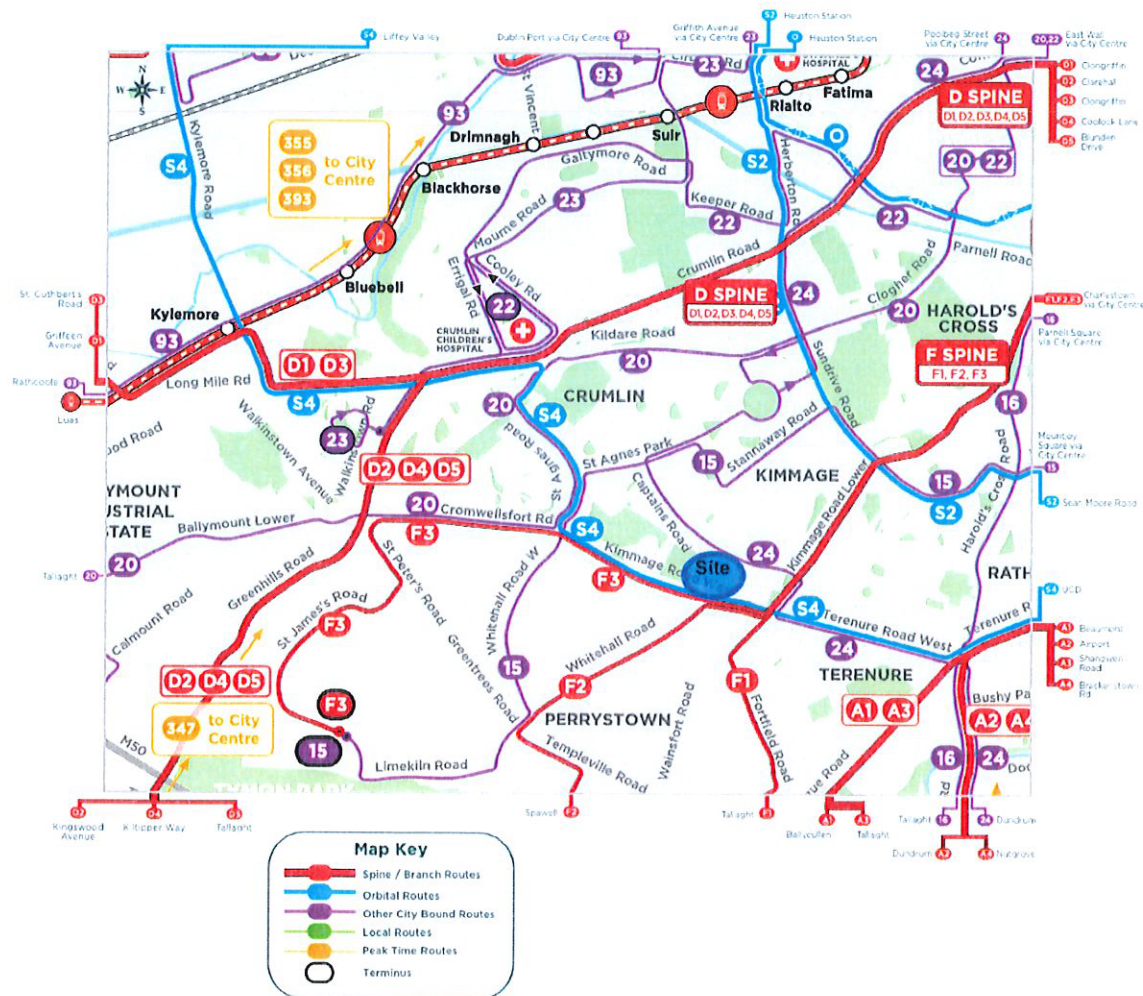
“To promote the concept of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well-designed, safe and inclusive public spaces served by local services, amenities and sustainable modes of transport”

A comprehensive redevelopment of the subject site to include a mix of uses under the Z10 zoning can meet these key policy objectives by providing a well located, high quality placemaking solution that is accessible to surrounding employment locations and the City Centre.

3.3 Public Transport

The subject site is also ideally located to maximise the use of public transport in the area with existing routes 9, 17 and 17D running along Kimmage Road at the front of the site and the 15A and 54A bus routes also running close to the site at Whitehall Road and Kimmage Road Lower serving a range of locations including the City Centre and Rialto.

The site will also benefit from the new Bus Connects Network Redesign with Spine and Orbital Routes serving the site including the F2 and F3 Spine Routes at Kimmage Road West that serve the City Centre, the F1 Spine Route at Kimmage Road Lower that serves Tallaght and the S4 Orbital Route at the front of the site that will serve UCD, Liffey Valley and connect to the Red Line Luas at Kilmore. The proposed bus connects map as it relates to the subject site is shown below.



Proposed Bus Connects Map as it relates to the Subject Site

All of the above criteria identify the subject site as being in alignment with the Metropolitan Area Strategic Plan (MASP), to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands in the city. As specified in the Draft City Development Plan in terms of quality housing and sustainable neighbourhoods, national and regional policy reinforces the need for 'healthy placemaking' and the delivery of well-designed, affordable, adaptable, infill and brownfield development close to existing services and facilities.

All of these elements can be accommodated at the subject site if the subject site is re-zoned to Z10 – Inner Suburban and Inner City Sustainable Mixed Use.

4 Conclusion

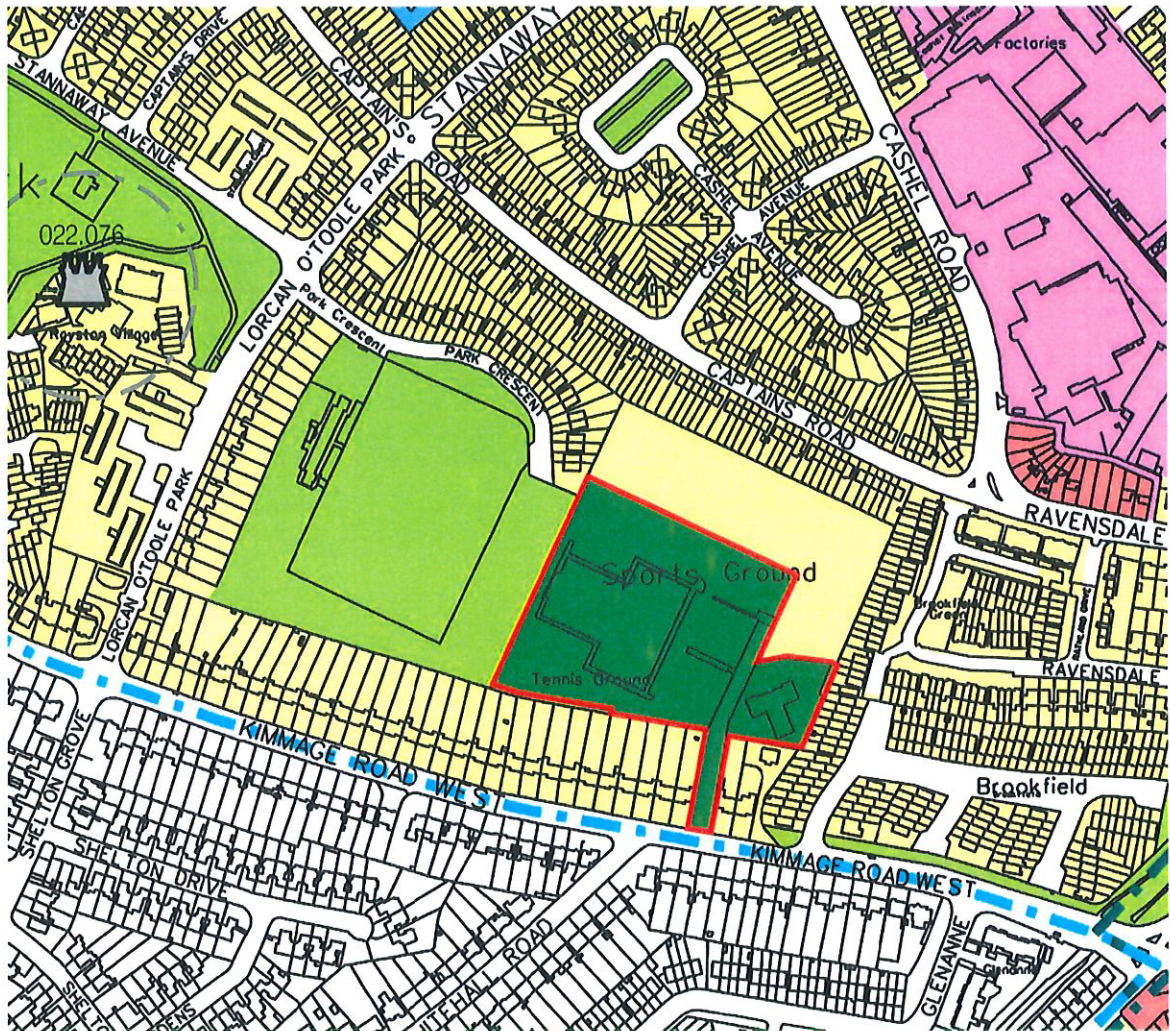
We respectfully submit that the current land use zoning of Z9 on the leisure club and former art gallery is inappropriate and inconsistent with the long-term future vision for comprehensive regeneration and redevelopment of Dublin City and is an underutilisation of the subject site. The existing Z1 zoning on the land to the north is appropriate and can be successfully integrated with a mixed use proposal at the subject site.

We therefore invite the Planning Authority to amend the Draft Development Plan Map G as follows:

To show the Ben Dunne Gym and Leisure Centre and vacant former Art Gallery site at the Kimmage Road West Site rezoned FROM Objective Z9 TO Objective Z10 ‘Inner Suburban and Inner City Sustainable Mixed Use’

Reason: In the interests of the proper planning and sustainable development of the area.

The requirement for a masterplan for sites in excess of 0.5ha is noted and can be facilitated at this location due to the single ownership and existing gym use to be retained. The site area and proposed land use zoning for the subject site are illustrated in the figure below.



Z10 – Mixed Use Zoning for Overall Site

We trust the foregoing sets out a reasonable rationale for the rezoning of the subject site and adequate justification is provided to allow this underutilised site to be brought forward for development in a sustainable manner to promote compact growth in line with national, regional and local policies.

