

## **STRATEGIC HOUSING DEVELOPMENT FOR SITE AT BOHERBOY, SAGGART, CO DUBLIN**

**Ref: 313145**

### **APPLICANT: KELLAND HOMES & DURKAN ESTATES**

**Residential Development consisting of 655 no. dwellings (257 houses & 398 apartments)**

**(A) Name of Person making submission: Patrick Dowling on behalf of Saggart East Residents Association**

**(B) The Subject matter of the Submission: SHD Residential Development on a site at Boherboy, Saggart, Co. Dublin consisting of (257 houses & 398 apartments)**

**(C) The Reasons, Considerations & Arguments on which the submission or observations are based on the following:**

### **Context**

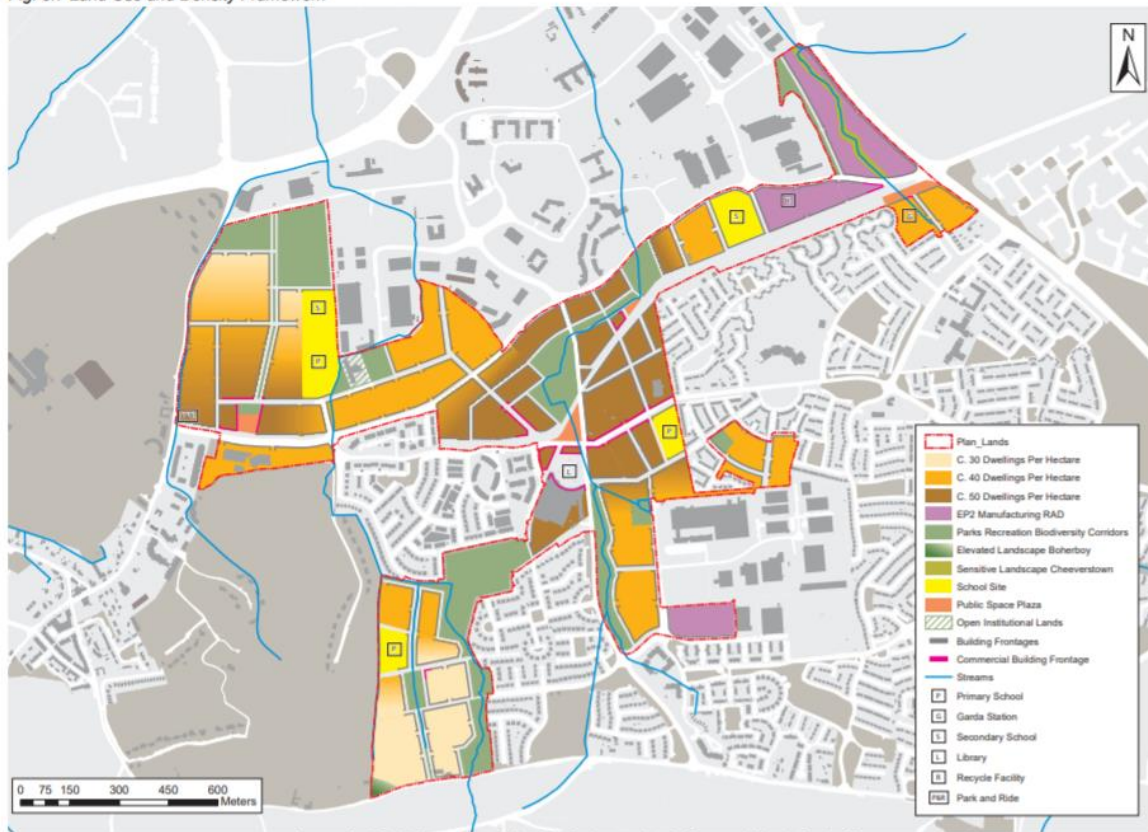
Citywest is very clearly a Growing Suburb of Dublin which unfortunately has never actually had a proper Vision for its development. The Fortunestown LAP tried to set out a vision which accepted the limitations of this suburb of Dublin but much of the fundamental aspects of this have been ignored – See below image taken in the year 2000 which shows context of Citywest. It is noted that this context has changed little in the intervening years apart from the fact that significant new housing has been added and continues to be added although it is accepted that there is now a shopping centre in the area but little else.



Geohive – Aerial Photo from year 2000 – Note Citywest in this image is clearly a developing suburb

There is no town here nor is there a plan for a new town. The Fortunestown LAP, which was developed by South Dublin Planning Department, in consultation with the Local Community, had a vision for Citywest organised around new neighbourhoods which would be centred on a 'District' core where the shopping centre is located. Densities proposed are appropriate to the developing suburban area. This vision was Sustainable in that within neighbourhood areas there are indicated locations for new schools and Community facilities including Creches to be built in tandem with new housing - see extract map below. This is a consistent vision with 'Sustainable Residential Development in Urban Areas' in particular Chapter 4 'Planning for Sustainable Neighbourhoods'

Fig. 5.7 Land Use and Density Framework



### Fortunestown LAP

The Fortunestown LAP, the first LAP for the area, attempted to consolidate a vision for Citywest in 2012 by placing the new shopping centre as the 'District' core. In the LAP the area was accepted as a growing suburb of Dublin on the outer edge of the city and the densities are consistent with this. In particular it is consistent with 'Sustainable Residential Development in Urban Areas' 2009 which stipulates maximum densities for suburbs on Greenfield sites of up to 50 dph. This document states the following for 'Outer Suburban' areas such as Citywest:

“(f) Outer Suburban / 'Greenfield' sites 5.11 These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares”. The Fortunestown LAP 2012 is entirely consistent with this vision.

What is being proposed now does not comply with the 'Residential Development Guidelines in Urban Areas' 2009.

Note also the Fortunestown LAP 2012 complies with more recent Planning Policy document 'Urban Development and Building Height Guidelines' 2018 where it states that for suburban areas, such as Citywest the following Policy applies:

## SPPR 4

“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure: 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2009)” or any amending or replacement Guidelines; 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more”

It is important to recognise that Citywest is a sprawling Suburb of Dublin at approximately 18km from the city centre and well beyond the M50 ring road. Citywest already has chronic traffic congestion and this will be increased with this new development at Boherboy due to a complete lack of vision for our area which currently is being developed in a ‘piece-meal’ fashion with each SHD being allowed to be built without a co-ordinated overall vision agreed for the area. In fact, the approach of SHDs is very undemocratic as it ignores the real concerns voiced by Community and appears to provide for new housing at any cost. Our area should have a new LAP and this should provide for all essential services within easy walking distance for new populations rather than relying on the outdated Fortunestown LAP which was made for a different context.

### **Apartment Developments**

Citywest is 18km from the city centre of Dublin. The Luas is a light rail service that moves very slowly and takes almost an hour to get to the city centre. High density apartment living suits areas that have an established high level of Urban Infrastructure such as the city centre in Dublin and along the canals. As we are a distant suburb without this existing Infrastructure apartments are not suited to this area. The Fortunestown LAP states that most housing on the outer edges of the area should be in the form of houses and not apartments allowing higher density only in the areas immediately adjacent to the shopping centre.

### **Population**

The older existing estates of the Belfry, Corbally, Verschoyle and Carrigmore have approximately 2,400 occupied dwellings with average occupancy of 2.75 (2016 Census) giving a population of 6,600 people in the immediate vicinity.

The ‘U Citywest Quarter’ development includes 600 dwellings in phase 1 and a similar number in phase 2 which was completed about a year ago. It is noted that Cairn Homes have recently commenced another phase of apartments with one block 13 floors in height. This is now under construction and is for approximately 700 apartments. These will add a further 5,225 people using the 2.75 (avg from 2016 Census) occupancy rate.

The newest development by Glenveagh homes called ‘BarnOaks’ is for approximately 650 no. dwellings (mainly apartments) which will give an additional population of 1787 persons.

The proposed Boherboy development of 655 units would add a further 1,801 based on the 2.75 occupancy rate.

When all are added together this gives a population of 15,413 in Citywest.

This population would exceed that of many Irish towns, for example Cavan town (10,914), Edenderry (6,490), Tullow (3,972) and Blessington (5,010). It is comparable to towns like Tullamore (14,607), Maynooth (14,585) and Wicklow town (10,584). These towns have garda stations, libraries,

secondary schools, community centres and sports facilities and a proper planned town centre urban cores for socialising etc, yet we are lacking all of this?

### **Lack of Social Infrastructure**

Citywest has no Civic buildings nor a Garda station. The 2012 Fortunestown LAP indicated that a Garda station be built near Cheeverstown Luas stop at some point in the future but nothing has happened to date. Early in 2015 there were a number of serious incidents of anti-social behaviour within the District Park. South Dublin County Council needs to be pro-active in addressing these issues and in maintaining the park and its facilities to a high standard to encourage good behaviour from the outset.

The issues of anti-social behaviour in the park, which is still ongoing, also highlights the urgent need for facilities for young and old such a library, community buildings, secondary school and other basic infrastructure to help our new area develop in a sustainable way. It is essential that physical and social infrastructure is put in early on and that it is accessible to all, rather than leaving it until it is too late. Large new growing areas, such as Citywest, with many children, need extra resources ahead of the more 'established' areas where demand would not be as high.

Note – Planning Contribution for this development should be ring-fenced for essential facilities for our area

### **Poor Maintenance of District Park & Anti-Social Behaviour**

There is an opportunity to improve passive surveillance at the boundary of the district park by ensuring new housing in Boherboy along the south and west boundary of the park faces onto the park. This will help to ensure any issues are reported/addressed quickly and the park is maintained to the required high standard helping towards the goal of a more sustainable community in the longer term.

Best Practice Guidelines for Quality Housing for Sustainable Communities (2007) states 'In general, all new housing should face onto the open spaces to improve 'passive surveillance'. It is noted that this area behind Verschoyle Rise is a 'blind spot' in the park and it is here that illegal bonfires are lit each year at Halloween with burning of furniture etc taking place. It is very important that the new development maximises this new opportunity to improve passive surveillance on the new edges of the park to mitigate the risk of this continuing.

It is noted that the Fortunestown LAP 2012 shows houses facing onto the park along this edge.

Also, there is an opportunity to make the Corbally stream which flows from Boherboy along the park boundary into an attractive feature with planting, landscaping and a bridge and path providing access from the park to the Boherboy Road and towards Saggart village.

The district park is a valued amenity but needs to be maintained to a much higher standard. Trees need pruning. Also, damaged and dead trees need to be replaced. More bins need to be provided to replace those vandalised. Litter picking needs to be more frequent especially around the playground where it is a constant problem (with some residents taking on cleaning tasks themselves in frustration). Borders or flower beds need to be instated, as one would find in any normal park. There are significant 'snags' that need attention such as the park signage which has not been completed. We have been told by SDCC this is "due to lack of resources". SDCC needs to commit the resources needed to maintain the park and amenities to a much higher standard to support the populations mentioned earlier.

This is especially true for the increasing numbers of apartment dwellers who do not have private gardens and so will inevitably will rely on the existing District Park to meet their social outdoor recreational needs.

Note – Planning contribution should be ring-fenced for Park maintenance and Infrastructure especially considering that this is the main access point for this new housing to shopping centre and Luas stop (noting that from upper end of Boherboy site it is approximately 1km from the Luas stop)

In summary the following are the main concerns that this development should address:

- Park Infrastructure & Anti-Social behaviour - Our Park is not adequately maintained or kept to a standard proportional to large populations around it. For example there are no flower beds. There is no weeding done. It is accepted that grass is cut and bins are occasionally emptied but little else is done to make it attractive. Planning Contributions from this development should be ring fenced for this facility eg by including bike paths in the park, which is key to the success of this new housing. Also, new development should attempt to improve 'Passive Surveillance' into the Park to help address reoccurring issues of anti-social behaviour in this part of the park.
- Lack of Amenities & Social Infrastructure - Citywest has significant new populations but has no normal town infrastructure such as a Garda station, sports facilities, theatre, library, main Street bank (AIB or Bank of Ireland), Health Centre etc. In reality due to this lack of essential social infrastructure people will be forced to use their cars to access most services. Planning Contributions should be ring fenced by ABP for some of this other supporting infrastructure for our area. It is noted that South Dublin County Council are not spending appropriately in Citywest (and this is probably due to a lack of an appropriate up to date LAP). This is exacerbated by ABPs recent approvals for many times the predicted populations in the Fortunestown LAP with thousands of new people coming into the area. For example a Civic building or Garda Station could be supported by way of a Condition forcing SDCC to Contribute to this. Similarly bicycle lanes need to be instated in access routes to this site by SDCC