

Job Number: 20091
Letter Reference: 150921
Date: 15 September 2021

Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24.



Dear Sir/Madam

Re: Submission to Draft South County Dublin Development Plan 2022-2028

Introduction

This submission is made on behalf of Tara Park Properties Limited, Unit 8, Block G, Maynooth Business Campus, Maynooth, Co Kildare, and relates to lands at Tara Co-op on the R148 (hereafter referred to as the Leixlip Road), at junction 5 of the M4. The submission seeks to encourage the County Council to reconsider the potential for development in this area and in general remove the lands from the High Amenity zoning attributed to it, we consider incorrectly, in the Draft Development Plan.

The Subject Lands

This submission is made in relation to lands in and adjoining the Tara Co-op site located to the west of junction 5 and north of the N4.



Figure 1.0a General Location and Context (Subject land 1a Green and 1b Purple)

The subject lands extend to some 7.54 hectares and are a combination of agricultural land to the west and the Tara Co-op buildings in the centre with a field to their immediate east.

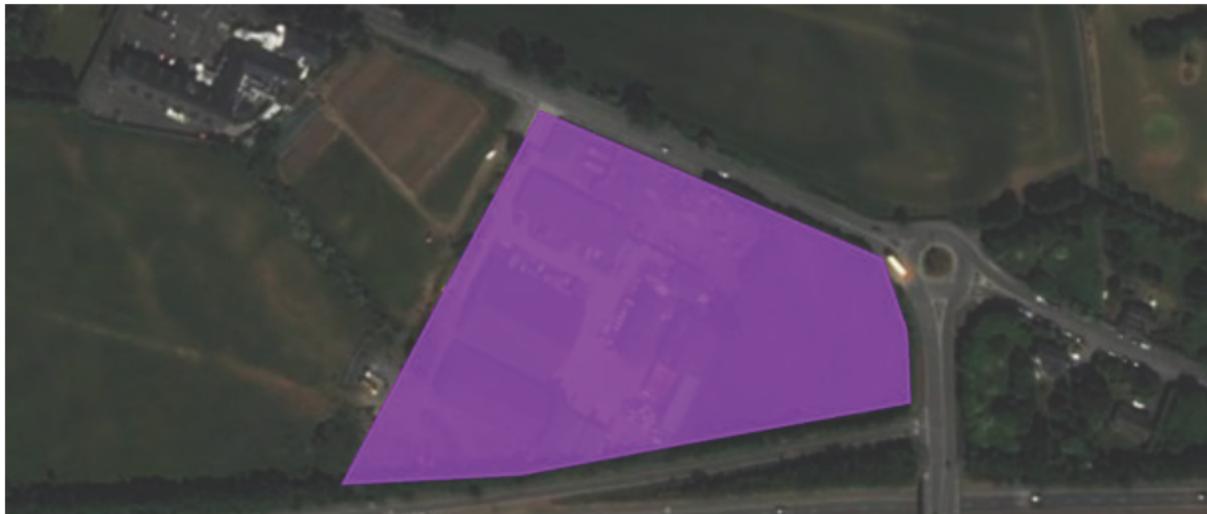


Figure 2.0b: Tara-Co-op Lands (subject land 1B)

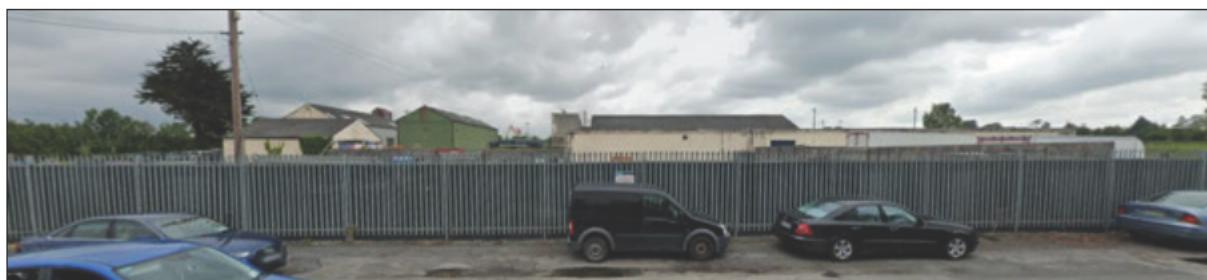


Figure 2.0: Tara Co-op

The lands are surrounded by road frontage with the N4 to the south and the Leixlip Road to the north and extend generally west to Cooldrinagh Lane. The Springfield Hotel takes up a large plot of lands to the north of the subject property.



Figure 3.0: Springfield Hotel

Lands further to the west of Cooldrinagh Lane, house a water treatment plant and foul water treatment plants along the banks of the River Liffey. A foul water treatment plant is located on the north bank of the River Liffey, to the north of the subject property.

The subject lands rest in naturally screened lands centrally between north west Lucan and South East Leixlip.



Figure 4.0: 5 Minute's Drive Time

Within the wider environment, a 5 minute drive time, consumes vast areas of Leixlip and Lucan as far as Collinstown Industrial Park to the north west and Liffey Valley Park to the east.

The subject lands clearly have very close physical connections with the wider urban area to its east and west and sits in an area already subject to expansive private and public development. This as we will show later is reflected in the Landscape Character Assessment accompanying the Draft Plan.

This submission focuses on the zoning of the land in their entirety (1a and 1b – Figure 1.0a) with specific focus on the potential for regeneration and employment creation on lands 1b.

Planning Application History

There is no recent application history on the subject site which is partly due to the general vagueness of the current Specific Local Objective associated with the lands and the extreme restrictions placed on the site by the underlying High Amenity zoning. It proved very difficult to source funding for an application due to the level of uncertainty in predicting what format of development would be acceptable.

2016-2022 Development Plan

Existing Zoning

The subject lands 1A and 1B are zoned "High Amenity" in the current Development Plan.



Figure 5.0: XXXxxXX

Specific Local Objective SLO HCL10 SLO1

The Tara Co-op lands are allocated with a Specific Local Objective (No1).

To facilitate the redevelopment and regeneration of the site of the former Tara Co-Op with a replacement development of a scale, design, and layout appropriate to its prominent location in the Liffey Valley "HALV" and in proximity to the M4 and the Lucan/Leixlip urban areas. Any such development shall be subject to an environmental management plan in relation to remediation of any contaminated land and should not compromise the important geomorphic and archaeological heritage of the site, and adjacent sites. Additionally, it should not compromise the vistas or landscape amenity or biodiversity of the Liffey Valley.

Landscape Character Assessment Status

More detail is provided in the Appended LVIA document prepared by CSR Land Planning and Design (**Appendix 1**). This study finds that the lands south of the Leixlip Road, including the subject site, are outside the Liffey Valley Character area, inside the Urban LCA. It finds the lands have capacity to absorb development without impacting adversely on the character of the neighbouring Liffey Valley LCA.

Draft Development Plan 2022-2028

Proposed Zoning

The subject lands are zoned "High Amenity".



Figure 6.0: Proposed Zoning

Specific Local Objective "SLO"

The SLO has been removed.

Landscape Character Assessment Status

The LCA finds that the lands are not part of the Liffey Valley High Amenity area. It falls into "Urban South Dublin". Further details are provided in the CSR assessment.

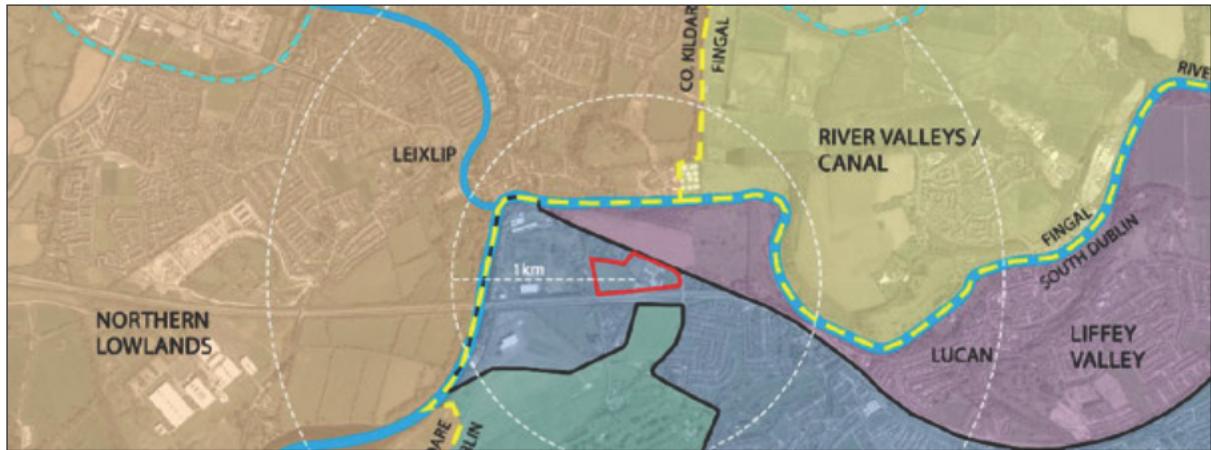


Figure 7.0: LCA areas – subject lands in the Urban South Dublin

The CSR Landscape and Visual analysis notes at page 25:

However the lands are significantly developed with the former Tara Coop buildings, the Leixlip Water Treatment Plant and the Springfield and Beckett Hotel, as well as the M4 to the south and Junction 5 interchange to the east and Leixlip Road itself connecting west to the town. Existing built or non-agriculture development comprises over 50% of the land (within the triangle) area, and all of the Tara Coop site. This is recognised by the South Dublin Landscape Character Assessment where this triangle of land is excluded from the Liffey Valley Character Area which more reflects the high quality and sensitive landscape of the Liffey Valley, and instead this land is included within the Urban South Dublin Landscape Character Area reflecting a more built-up character.

National Planning Framework (NPF)

The following NPF objectives apply to and support development on the Tara Co-op lands which are now classified as being part of "Urban South Dublin".

In the Dublin City and Metro area page 36 of the NPF notes:

At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development. It will also require significant green-field development, on sites that can be integrated with the existing built-up area of the city and serviced by high capacity public transport, many of which are already designated as Strategic Development Zones (SDZs). This requires a holistic approach to ensure that residential and employment

development is served by transport, infrastructure, and amenities. It also means ensuring that smaller scale opportunities for infill and brownfield development are realised.

NPF4 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

NPF5: Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment, and prosperity.

NPF6: Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

Page 65 of the NPF noted that

The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village.

NPF11: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPF73a: When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

Draft Development Plan Policies and Objectives

There are a series of Draft DP policies and objectives which support the development of the subject lands. The Tara Co-op site in particular has great potential as an employment location located as it is:

- In the Urban South Dublin Area
- Proximate to large seats of population in Lucan and Leixlip
- A brownfield, windfall, regeneration site.
- Close to public transport routes between Leixlip and the city
- Located at a junction of the M4.
- Opportunity to develop a high end, landscaped employment centre at a key junction on the N4.

Support sustainable enterprise and employment growth in South Dublin County recognising the County's role in the Dublin region as a driver of economic growth

EDE1 Objective 1: To enable a strong, inclusive, and resilient economy, supported by enterprise, innovation, and skills through the creation of places that can foster enterprise and innovation and attract investment and talent, consistent with National Strategic Outcomes 4, 5 and 6 of the NPF.

EDE1 Objective 3: To ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development

types and to promote compact growth by strengthening the integration between employment, housing, and transportation.

EDE1 Objective 6: To ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions by supporting and promoting the following measures:

- An increase in employment densities within walkable distances of communities and on public transport routes.
- Promotion of walking and cycling and use of public transport through increased permeability and mobility management measures within and outside employment areas.
- The sourcing of power from district heating and renewables including wind and solar.
- Additional native tree planting and landscaping on existing and proposed enterprise zones and development sites to aid with carbon sequestration, contribute to the green infrastructure network of the County and promote quality placemaking.

EDE3 Objective 5: To promote, through good placemaking, the delivery of places and communities which encourage employers and workers alike to live in the County, closer to their workplaces, promoting more sustainable travel and a good quality of life.

EDE3 Objective 6: To support the development of new and existing enterprise centres to provide locally based affordable work facilities such as co-working space and to improve employment opportunities and creative networks for local communities.

EDE4 Objective 5: To ensure that proposals to diversify or densify underutilised industrial lands support the overarching goals of placemaking, consolidating growth centres along public transport corridors in a planned and/or sequential basis, and ensuring realisable linkages with nearby services and amenities.

EDE4 Objective 8: To support the provision of a broad diversity of employment opportunities in the County that can attract a wide range of skills, training, and educational qualifications for a resilient and inclusive economy.

EDE4 Objective 9: To consider proposals and initiatives that seek to re-purpose redundant or declining uses in important urban locations and ensure that proposals for the reuse of buildings demonstrate that new uses support a more sustainable use of the urban centre, having particular regard to its location and accessibility.

Servicing of the subject lands.

The attached report prepared at **Appendix 2** which set out the current serviceability of the subject lands. With reference to NPF73a above this report establishes that the subject lands can indeed be serviced.

Public Transport

Aside from the site's excellent road connections, it also benefits from a series of public bus routes between Leixlip and the City:



- 66: Merrion Square to Maynooth – every 30 mins
- 66A: Merrion Square to Leixlip – every hour
- 66B: Merrion Square to Leixlip – every hour
- 67: Merrion Square to Maynooth – every 30mins
- 66E: Merrion Square to Maynooth – every hour

The lands have excellent, high capacity, frequent bus services passing from early morning to late evening. This makes a substantial contribution to the merit of the lands as a sustainable, employment location.

Vision for the Lands

The general concept is an employment related development set in a parkland setting. The concept set out below provides an illustration of a sensitive form of development which respects the wider, sensitive landscape setting outside the site, to its north. In line with wider Green Infrastructure objectives and of course taking account of the sensitivities of Liffey Valley a parkland concept would be appropriate in this area.



Source: Plus Architecture

This form of development or smaller blocks set in wider green lands, accords with Green Infrastructure policies and objectives in the Draft Plan.

Proposed Recommendations

Zoning of the Subject lands

Under the proposed zoning (HA-LV) the potential to develop the site is limited and would continue to prevent projects coming to fruition.

The site itself is located on the very fringes of Lucan and Leixlip and we consider given its developed, brownfield status a more positive zoning allocation could be applied. Also it is no longer part of the Liffey Valley LCA in the Draft Plan but is now part of the Urban Area.

We note other peripheral locations benefit from active zonings, even ones deeply set inside the HA-LV zoning allocation, benefit from EE zoning.



Figure 8.0: Extract from Map 1

There are also large tracts of lands in Map 4, the vast majority rural, greenfield and never before developed or serviced and with no road infrastructure which is allocated as EE. Under the NPF objectives, the subject lands present a much more sustainable resource for employment zoning.

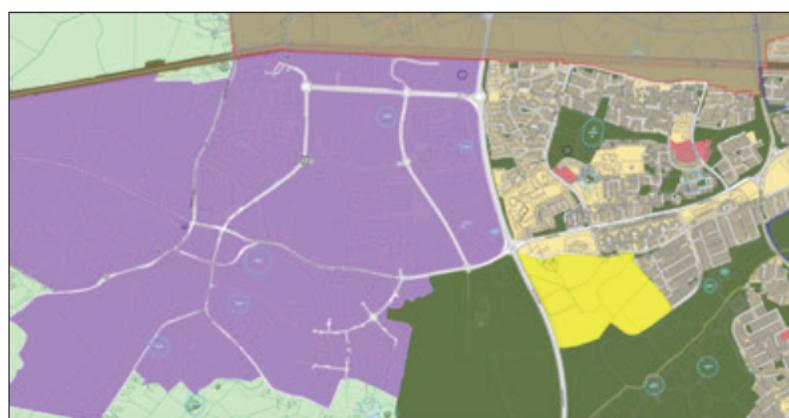


Figure 9.0: Extract from Map4. Vast rural lands zoned EE.

Proposed Zoning of Tara Co-op Lands.



Figure 10.0: Proposed Zoning

Proposed Zoning – Subject lands 1A:

It is our opinion that these lands should be zoned as “RU”. These lands are part of wider triangle of land to the west of Cooldrinagh Lane which have already absorbed substantive development including large public infrastructure projects.

In line with the recommendations of the attached Landscape Assessment (CSR Landplan) we also consider the wider lands to the west of Cooldrinagh Lane and south of Leixlip Road (and north of the M4) should also be rezoned to “RU”. All of this area forms part of the Urban LCA.

Proposed Zoning – Subject lands 1B

It is our proposal that subject land 1B would be zoned as “EE”¹ taking account of the development already on the majority of the lands and the fact the field to the immediate east of Tara Co-op is only accessible through the Tara Co-op land.

The zoning would recognise the fact the site is already developed and in active use but is underused and has been recognised to have regeneration potential in the last two development Plans. However, it would also realise the fact the lands are no longer in the Liffey Valley LCA and have been classified as being in the Urban Area, drawing them into line with National, Regional and local policy objectives which change the entire policy dynamic of the area.

Furthermore the land is serviced by a number of good quality bus routes catering for Maynooth, Leixlip, Lucan and various stops to the city centre, allowing connections to other parts of the city. There are bus stops proximate to the site.

¹ Objective: *To provide for enterprise and employment related uses*

Uses permitted in principle in this zoning include:

Abattoir, Advertisements and Advertising Structures, Boarding Kennels, Enterprise Centre, Fuel Depot, Heavy Vehicle Park, Home Based Economic Activities, Industry- General, Industry-Light, Industry-Special, Office-Based Industry, Office less than 100 sq.m, Open Space, Petrol Station, Public Services, Recycling Facility, Refuse Transfer Station, Science and Technology Based Enterprises, Scrap Yard, Service Garage, Shop-Local, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.

Uses open to consideration include:

Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, Data Centre, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.

Special Local Objective (SLO)

A Special Local Objective should be reapplied to the entirety of lands 1b which allows for forms of development that are job creating.

To facilitate the redevelopment and regeneration of the site of the former Tara Co-Op and adjoining land to its east with a replacement development of a scale, design, and layout appropriate to its prominent location close to the Liffey Valley "HALV" and in proximity to the M4 and the Lucan/Leixlip urban areas. Any such development shall be subject to an environmental management plan in relation to remediation of any contaminated land and should not compromise the important geomorphic and archaeological heritage of the site, and adjacent sites. Additionally, it should not compromise the vistas or landscape amenity or biodiversity of the Liffey Valley.

This "SLO" may only be required where the Council does not consider it appropriate to rezone the subject lands either as "EE" or like lands 1a, "RU". The "RU" zoning could also be a fall back zoning for "EE".

Yours faithfully



Tony Bamford
Tel: 087 2903208

Appendix 1:
Landscape and Visual Assessment
CSR Landplan

Appendix 2
Servicing of subject lands

1. Surface Water

The site at Cooldrinagh extends over approximately 7.28ha (18 acres). It is bounded on the south by the M4 motorway and by Coodrinagh Lane on the west. The site is roughly triangular in shape with its apex at the eastern end alongside the roundabout and road bridge across the M4 motorway. The highest ground is located on the southwest corner of the site and the site falls towards the northeast.

As can be seen in Figure 1 below existing 225mm dia sewers are located in Cooldrinagh Lane and in the Leixlip Road. The surface water sewer in Cooldrinagh Lane discharges into a 300mm diameter surface water sewer in the Leixlip Road which discharges to the Liffey at Leixlip Bridge. The 225mm dia surface water sewer on the north boundary of the site commences at the west end of the site adjacent to the Springfield Hotel and runs to the roundabout at the motorway junction.



Fig 1 SW Sewers (Tii 1200 dia. outfall to Liffey not shown)

The surface water runoff from the motorway discharges to the Liffey via a 1200mm diameter sewer at this junction. South Dublin County Council and the National Roads Authority (now Tii) had agreed, in respect of a previous planning application relating to these lands, to a surface water connection to this sewer from the proposed development site. They required that the surface water runoff from the development site be attenuated to greenfield runoff rates. The principles of Sustainable Urban Drainage (SUDS) would also be required to be

adhered to in respect of such a proposal. Attenuation of runoff flows to greenfield runoff rates can be achieved by use of a combination of green roofs, permeable paving and attenuation in the form of ponds, swales and below ground storage.

2. Foul Sewerage

There is no connection from the existing Tara Co-op buildings to the public foul sewerage system in Lucan. It would appear that the buildings were served by a septic tank. The adjacent Springfield Hotel is served by a pumping station, installed in 1993, and upgraded in the late 19900's when the hotel was extended. This pumping station pumps flows along the Leixlip Road and into Weston Park foul sewerage system on the south side of the M4 motorway. Sewage flows from Weston Park must pass through three pumping stations in order to discharge to the Dublin Main drainage Sewer 9B at Balgaddy. These pumping stations are the Lucan Spa, Lucan Low Level and Esker pumping stations..



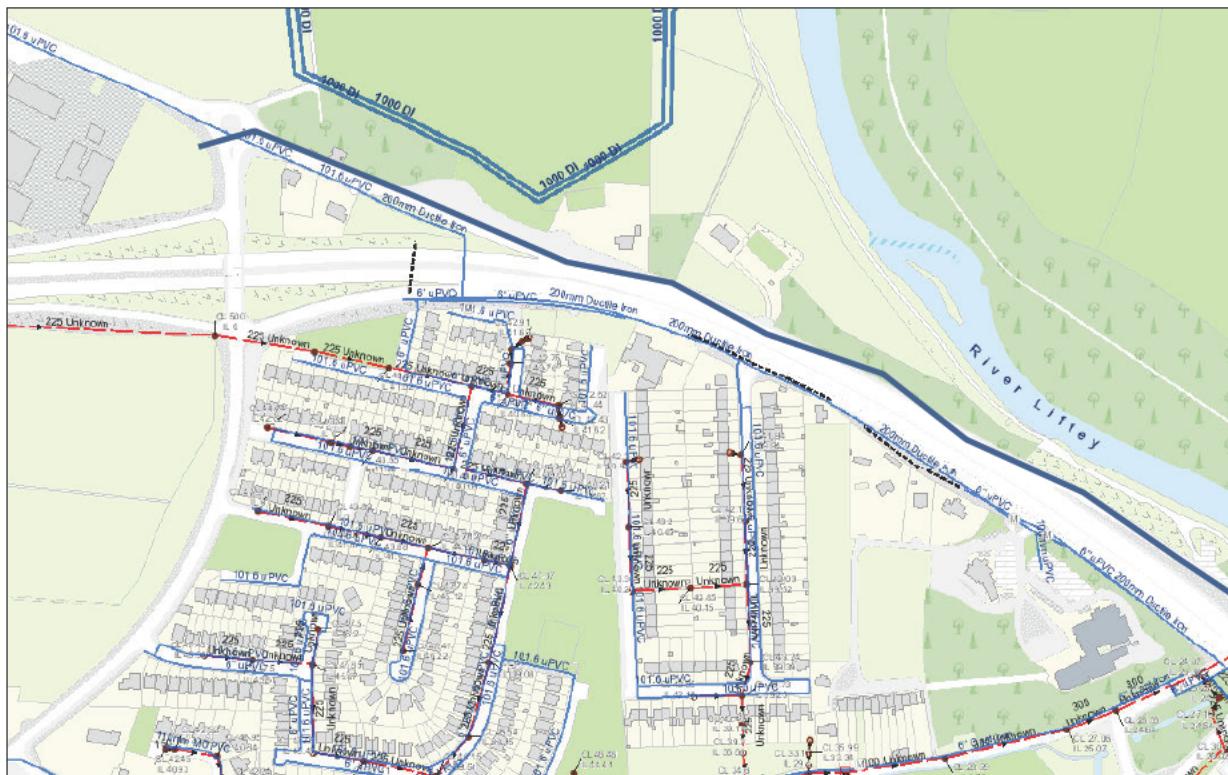
Fig. 2 Foul Sewer and Watermains

While consent was obtained in the past from the NRA (now Tii) to the installation of a rising main from the Tara Co-Op lands to Weston Park, the scheme proposed at the time did not receive planning approval. The foul sewer network at Weston Park is shown at Fig 2 above. This option would have involved a rising main of less than 250m length including a section laid within the bridge deck of the M4 overbridge. We are aware that there were quality and

infiltration problems with the sewer network in Weston Park in the past which may present challenges with this option. It is not known if these issues have been resolved in recent years.

An alternative option for a foul sewer connection for the development site would be a gravity connection (or possibly a rising main) from the lands to the Lucan Spa PS routed along the hard shoulder of the N4 and its associated slip roads. This would entail approximately 1 km of off-site pipework to complete the connection. Along the route indicated at Figure 3 below.

A further option would be to provide a gravity sewer in the Leixlip Road westwards to the vicinity of the Salmon Leap pub where a pumping station could be provided to pump to the inlet sewer to Leixlip Wwtp on the north side of the river. This option would have the benefit of facilitating the servicing of the entire block of land bounded by the Liffey, the Leixlip road and the M4.



3. Water Supply

The existing watermains distribution system in the vicinity of the site comprises a 4" watermain in Cooldrinagh lane a 4" main in the Leixlip Road along the site frontage and a 200mm watermain in the Slip road from the N4 road as far as the roundabout as shown at Figures 2 and 3 above. The Lucan Palmerstown Water Supply Scheme was constructed with the objective of improving water supplies to the Lucan Area. These works included a new reservoir Peamount and trunk main upgrades in the Lucan area.

4. Conclusion

Ultimately, Irish Water will determine the feasibility of the options for serving these lands with water supply and through the Pre-connection confirmation of Feasibility process. However, the above demonstrates that there are a number of options available for the servicing of the Tara Co-op lands at Cooldrinagh Lucan in the event a change to the zoning of the lands is incorporated in the County Development Plan 2022 -2028