



THORNTON O'CONNOR
TOWN PLANNING

Development Plan Submission

**Submission in respect of the
*Draft South Dublin County Development Plan
2022-2028***

**Relating to lands at Rathcreedan, Rathcoole,
Co. Dublin**

Submitted on Behalf of

St. Finian's GAA Club and Mr Con McCarthy

September 2021

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Planning Department
South Dublin
County Hall Tallaght
Dublin 24
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Friday, 10th September 2021

Dear Sir/ Madam,

RE: SUBMISSION IN RESPECT OF THE *DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 - 2028* IN RELATION TO THE ZONING OF LANDS AT RATHCREEDAN, RATHCOOLE, CO. DUBLIN

1.0 INTRODUCTION

1.1 Purpose of this Letter

Thornton O'Connor Town Planning have been retained by Mr Con McCarthy and St. Finian's GAA Club¹ to prepare this Submission to South Dublin County Council in respect of the *Draft South Dublin County Development Plan 2023 -2029*.

The lands subject to this submission have an address at 'Rathcreedan, Rathcoole, Co. Dublin' but are located on the urban fringe of Newcastle between Newcastle and Greenogue Business Park as shown in Figure 1.1 below.

¹ Alymer Road, Newcastle, Co.Dublin



Figure 1.1: Aerial Photograph of the Subject Lands.

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

The subject lands, which have an area of c. 10.5 Ha, are zoned 'Rural Amenity and Agriculture' are currently greenfield in nature and if developed would form a natural extension of Newcastle Town in the direction of the cemetery and substantial employers.

Key Point:

The Purpose of this Report is to demonstrate that the rezoning of the subject lands from their current Objective 'RU' use (to protect and improve rural amenity and to provide for the development of agriculture) to Objective 'RES-N' (to provide for new residential communities in accordance with approved area plans) and to extend the boundary of the Newcastle Local Area Plan to encompass the subject lands and the adjacent cemetery.

The subject lands present an opportunity to provide sequential and sustainable residential development in close proximity to large employment nodes. In addition to forming a natural extension to Newcastle Village, it should be highlighted that the rezoning of the subject lands will provide the opportunity for an important connection between Newcastle Cemetery and the existing urban centre.

Mr Con McCarthy has been engaging with St. Finian's GAA Club in Newcastle who are currently seeking to expand their facilities for the local community. As part of the rezoning and subsequent development of the subject lands Mr Con McCarthy is committed to provide approximately 3.2 - 4 Ha of land and significant funding to deliver leisure and recreational facilities for use by the GAA and wider community. The provision of such facilities would be an excellent planning gain for the Newcastle and wider South Dublin areas.



1.2 Format of this Submission

The following is the format of this submission:

Section 1 provides this **Introduction** to the Site;

Section 2 provides an Overview of the **Location and Context** of the Subject Lands;

Section 3 details the **Planning Policy** Context;

Section 4 demonstrates the **Severe Housing Shortage** Prevailing which is the **Background** to this Submission;

Section 5 sets out how the **Rezoning of The Subject Lands Can Assist in the Delivery of Housing and Community Infrastructure** and Contribute to the Growth of Newcastle as a Sustainable Small Town;

Section 6 provides a **Conclusion**.

2.0 LOCATION, DESCRIPTION AND CONTEXT OF SUBJECT LANDS

2.1 Location of the Subject Site

The lands subject to this Submission are located to the eastern side of Newcastle and to the west and south of the Newcastle Cemetery. The wider proportion of the subject lands are bounded to the west by the 'Ballynakelly Cottages' and to the east by lands encompassed within the Greenogue Equestrian Centre. The southern edges of the site are bounded by agricultural lands. An aerial photograph of the subject lands is provided below.



Figure 2.1: Aerial Photograph of the Subject Lands.

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

The subject lands are accessed from the main Lucan to Rathcoole R120 Road located to the north of the subject lands.

The subject lands are currently located outside the *Newcastle Local Area Plan, December 2012 (as extended)* settlement boundary as shown in Figure 2.2.



Figure 2.2: Newcastle LAP 2012 Boundary Shown in Purple with the Lands Subject to this Document Shown in Red (Indicative Boundaries).

Source: Google Earth, Annotated by Thornton O'Connor Town Planning, 2021.

2.2 Surrounding Contexts

The area surrounding the subject's lands are multi-use. To the east lies the employment clusters of the Greenogue and Aerodrome Business Parks, part of which is visible in Figure 2.2 above. To the west lies the town of Newcastle, which includes residential and commercial land uses. The subject lands 'interrupt' the continual built form of Newcastle as it approaches Newcastle Cemetery.

An aerial photograph identifying the surrounding context of the subject lands is provided below.

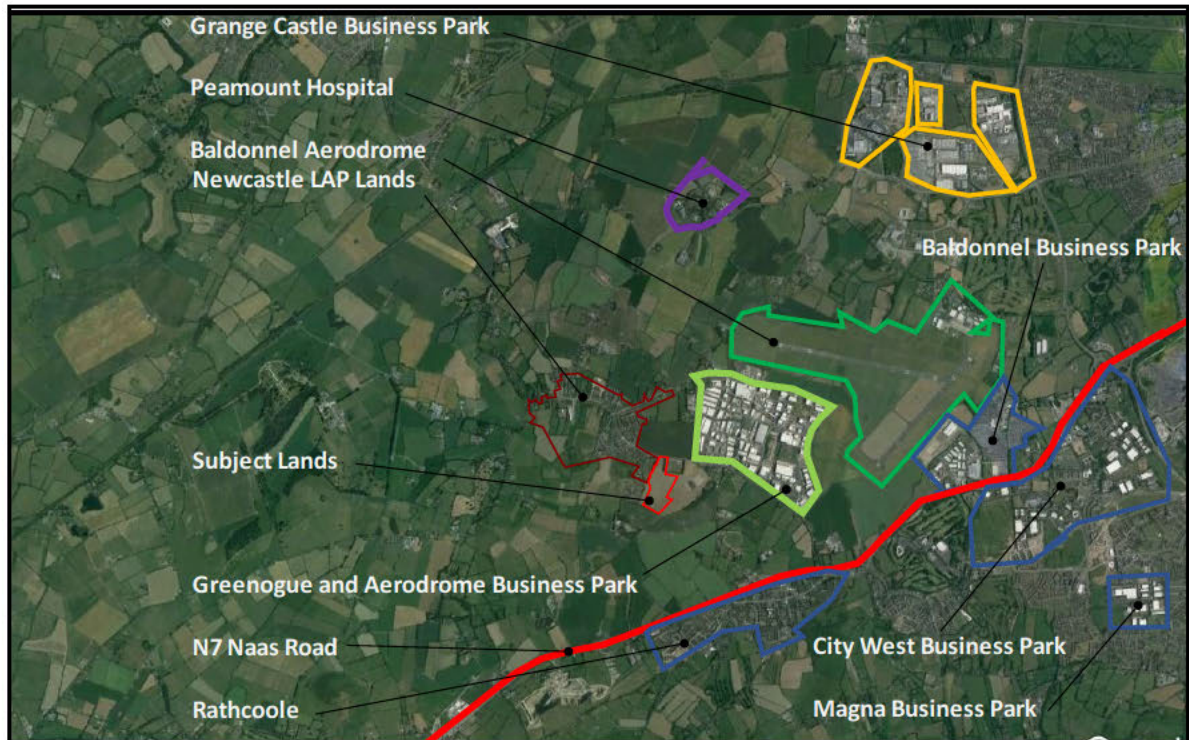


Figure 2.3: Aerial Photograph of the Surrounding Context.

Source: Google Earth, Annotated by Thornton O'Connor Town Planning, 2021.

2.3 Accessibility of Subject Lands

The subject lands have very good accessibility through the existing road networks and provision of public transport in the locale. In addition, footpaths connect the subject lands to Newcastle to the west and the employment opportunities to the east.

Road Network

As previously mentioned, the subject lands front the Lucan to Rathcoole R120, this regional road connects to the N7 Naas Road at Junction No. 4 which is located c. 2 km to the south-east of the subject site. The N7 Naas Road provides connectivity to the wider road network surrounding Dublin, including the M50 motorway, Dublin Airport and the Port Tunnel which provides access to Dublin Port.

Bus Services

The subject lands are currently served by an hourly Dublin Bus Route (No. 68) from Hawkins Street to Newcastle/Greenogue Business Park. The image below illustrates the bus stops served by the No. 68 bus which provide further connectivity to alternative bus routes and modes of public transport in Dublin City and environs.

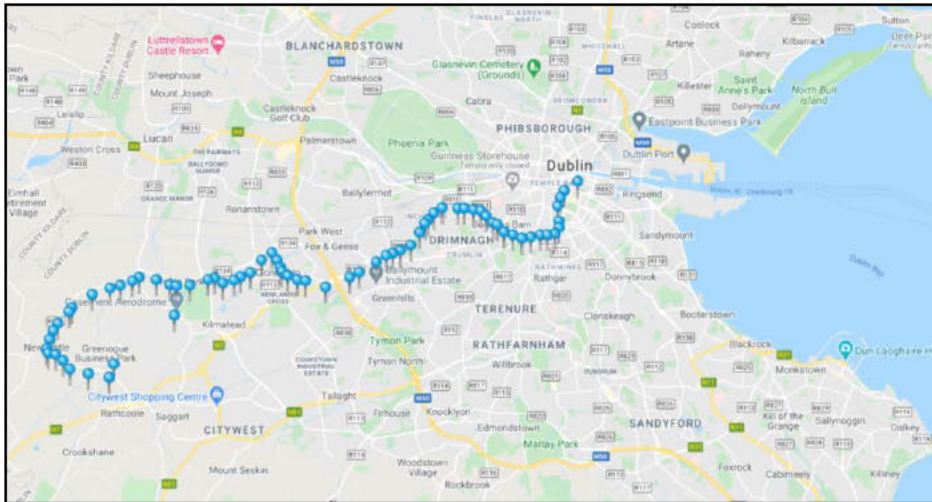


Figure 2.4: Dublin Bus Route No. 68 serving the Subject Lands.

Source: Dublin Bus, 2021.

In addition, the subject lands will be served by the Proposed Bus Connects Network which will provide 2 No. additional frequent bus routes:

- Orbital Route W6: Maynooth – Celbridge – Citywest – Tallaght (Frequency 30 No. mins).
- Local Route L56: Newcastle – Clondalkin – Red Cow (Frequency hourly).

An additional single daily peak time route (No. X56) between Newcastle – Peamount – City Centre will also be provided.



Figure 2.5: Extract from Bus Connects Proposed Routes indicating the Subject Site.

Source: <https://busconnects.ie/media/2027/saggart-area-map.pdf>, annotated by Thornton O'Connor Town Planning, 2021.

Rail Services

The Luas Red Line is accessible from Teach Sagart (c 9 No. min drive/ 19 No. minute cycle), Fortunestown or City West (also benefits from a Park and Ride) (c. 8 min drive/21 No. min cycle).

The Hazelhatch and Cellbridge Train Station is located c. 4.8 to the north-west of the subject lands (7 No. min drive/13 No. min cycle). There are 5 No. routes operating at the Hazelhatch and Cellbridge Train Station:

- Dublin Heuston – Cork;
- Dublin Heuston – Galway;
- Dublin Heuston – Limerick and Ennis;
- Dublin Heuston – Waterford; and
- Grand Canal Dock and Dublin Heuston – Portlaoise.

2.4 Leisure and Recreational Facilities Located within Newcastle LAP lands

There are no dedicated leisure and recreational facilities within the Newcastle town boundary as defined by the Local Area Plan.

St. Finian's GAA Club is located to the North-East of Newcastle Village, outside of the town boundary, and is accessed via Aylmer Road. It is clear from the aerial photographs below that despite the growth in population of Newcastle over the last c. 10 years there has been no significant investments to the physical GAA facilities available to the community. The current facilities include a small clubhouse and one pitch that are outside of the town. In the interests of proper planning and sustainable development, sporting facilities should be located within town boundaries.



Figure 2.6: Google Earth Images from 2020 and 2009 with the St. Finian's GAA Lands Outlined in Green and Newcastle LAP 2012 Boundary Shown in Purple (Indicative Boundaries).

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

Whilst pedestrian footpaths are provided from Newcastle Village to the GAA lands, there are noticeable concerns with the current provision of pedestrian footpaths from Alymer Road to the GAA grounds along the narrow access that is lacking in passive surveillance. Images of the access are provided below for reference. The current layout does not account for the increase population of Newcastle utilising the recreational facilities, particularly during peak hours of usage where there is traffic travelling in both directions.



Figure 2.7: Images of the Access Road from Alymer Road to the GAA Grounds.

Source: Google Earth, 2021.

Peamount United Football Club is located further north-east of Newcastle and is also located beyond the town boundary. The club benefits from a clubhouse, full size FIFA 2 star artificial floodlit soccer pitch and 2 No. sand based pitches². Aerial photographs of the Peamount F.C below, illustrate little changes in the facilities over the last c. 10 No. years.

² <http://www.peamountutd.com/about-us/>



Figure 2.8: Google Earth Images from 2020 and 2009 with Peamount F.C Lands Outlined in Green and Newcastle LAP 2012 Boundary Shown in Purple (Indicative Boundaries).

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

It is our understanding from review of the Newcastle locale that St. Finian's GAA club and Peamount F.C are the only outdoor recreational facilities currently available. It should be highlighted that neither St. Finian's GAA club or Peamount F.C are located within the Newcastle LAP boundary.

The leisure and recreational facilities envisaged for the lands subject to this report will be located within the town and for use by the entire community and not solely for use by local soccer or GAA teams. The current schematic illustrates that the lands have the potential to provide a full size all weather playing pitch, two basketball courts, dressing rooms, a walking/jogging/cycling track, car parking area and open space.

Key Point:

The rezoning of the subject lands from their current Objective 'RU' use (to protect and improve rural amenity and to provide for the development of agriculture) to Objective 'RES-N' (to provide for new residential communities in accordance with approved area plans) with a Site Specific Local Objective to provide leisure and recreational facilities for use by the community would represent a significant planning gain for the sustainable development of Newcastle as a Small Town. Importantly, the facilities would be located within the town boundary providing a very important amenity for an expanding population and adhering to the principles of proper planning and sustainable development.

3.0 PLANNING POLICY CONTEXT

3.1 Zoning of the Subject Lands in the *South Dublin County Development Plan 2016 - 2022*

The lands subject to this report are zoned 'RU' in the *South Dublin County Council Development Plan 2016-2022*, where the stated objective is 'to protect and improve rural amenity and to provide for the development of agriculture'.

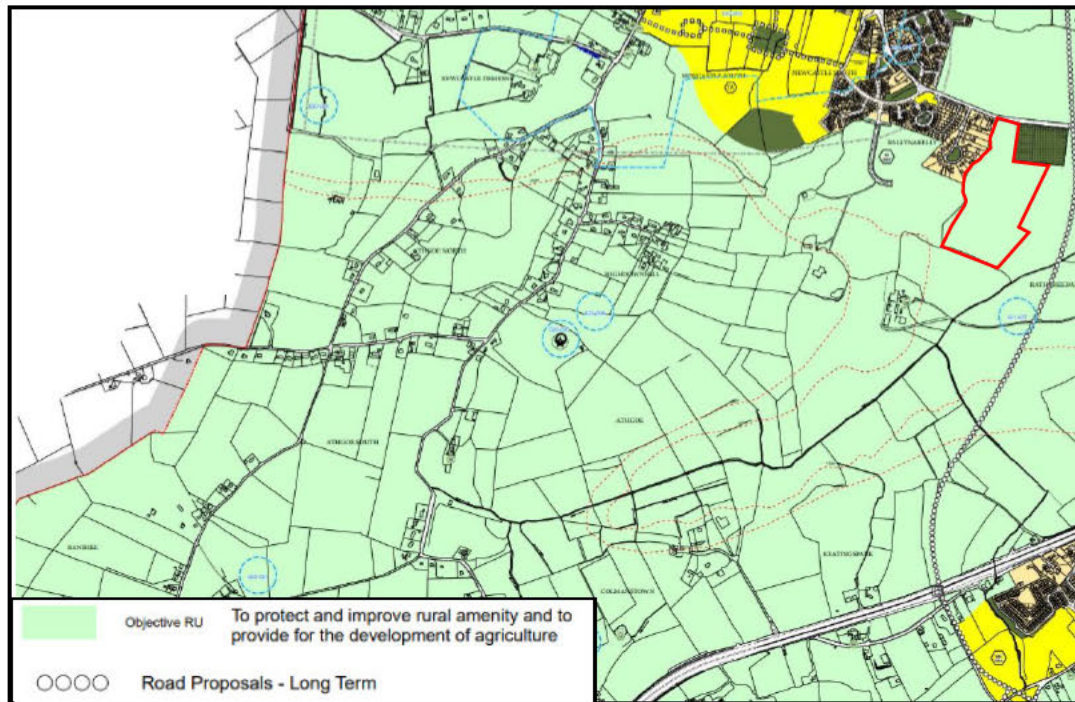


Figure 3.1: Zoning Map with the Subject Lands Outlined in Red.

Source: Map 7, *South Dublin County Development Plan 2016 – 2022*, annotated by Thornton O'Connor Town Planning, 2021.

There is also a 6 No. year road proposal identified to the east extremities of the subject lands.

A review of the current *South Dublin County Development Plan 2016 -2022* and the *Newcastle Local Area Plan, 2012 (as extended)* highlight a number of key reasons why the rezoning of the subject lands from 'RU' use (to protect and improve rural amenity and to provide for the development of agriculture) to Objective 'RES-N' (to provide for new residential communities in accordance with approved area plans) is appropriate at this location having particular regard to the vision of South Dublin County Council for Newcastle.

3.1.1 The Delivery of Housing is a Challenge for South Dublin County Council at a Macro Level

The *South Dublin County Development Plan 2016 -2022* projected 'a likely need for 32,132 additional housing units in South Dublin County over the 7 year period from 2015 – 2022'. Furthermore, the Interim Housing Strategy 2016-2022, 'forecasts that 8,303 social housing units will be required during the period 2016 – 2022'.

At this time of writing this report, the CSO Statistics on 'New Dwelling Completions' between the period of 2015 – 2020³ demonstrated that there were only 6,210 No. units completed in the functional area of South Dublin County Council. These figures include single houses, scheme houses and apartments. The breakdown in housing completions has been extracted from the quarterly survey data and is provided below.

	Q1	Q2	Q3	Q4	Total
2015	70	50	96	90	306
2016	62	87	131	194	474
2017	149	251	235	291	926
2018	242	466	428	518	1,654
2019	395	360	393	516	1,664
2020	313	165	218	917	1,613
					6,210

Table 3.1: CSO Statistics on 'New Dwelling Completions' in the Functional Area of South Dublin County Council

Source: Central Statistics Office 2015 -2020

Key Point:

The *South Dublin County Development Plan 2016 -2022* forecasted a housing need of 32,132 No. units by 2022. The available data extracted from the CSO housing completion surveys indicated that just 6,210 No. units were completed in the functional area of South Dublin County Council at the end of Q4 2020 thus demonstrating that the forecasted demand and the actual supply of housing in South Dublin County are significantly misaligned.

3.1.2 The Projected Housing Delivery as per the *Newcastle Local Area Plan December 2012*, as extended Has Not Materialised during the Lifetime of the *South Dublin County Council Development Plan 2017 -2022*

The majority of lands identified in the *Newcastle Local Area Plan 2012* to be developed for residential development have not materialised through the lifetime of the current Development Plan, thus limiting the potential growth of Newcastle as a small town.

³ <https://data.cso.ie/>

Thornton O'Connor Town Planning carried out a planning search of all applications in Newcastle Town and sites surrounding the subject site during the lifetime of the current Development Plan. An aerial photograph identifying the location the applications is provided below for reference.

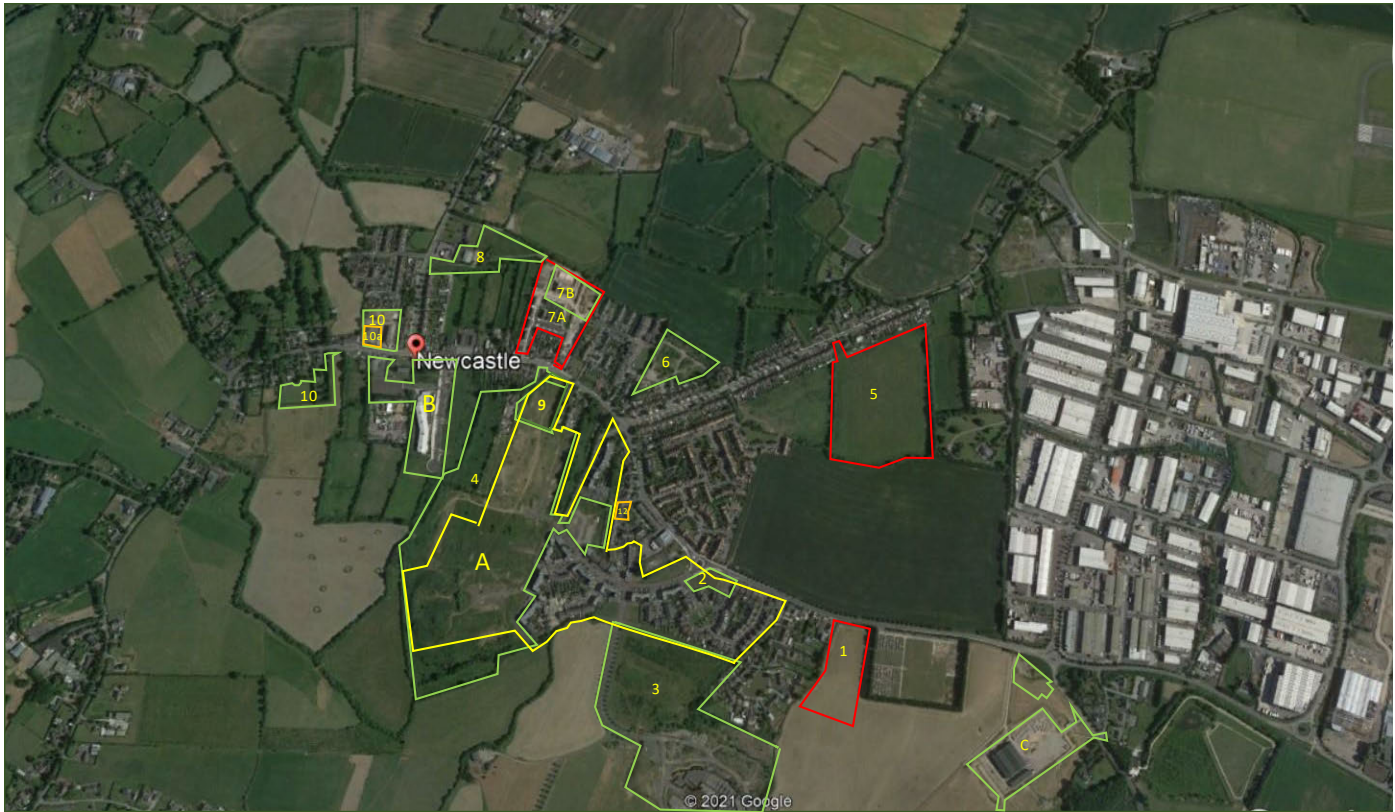


Figure 3.2: Aerial Photograph Annotated to Show Applications

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

A corresponding summary of the planning applications is provided below at Table 3.2. The extant residential permissions are highlighted in yellow for clarity.

Map Ref	SCDCC Reg. Ref.	Decision Date	Use	Status	No. Residential Units
A	SD05A/0344/EP	10/09/2014	Residential, creche & neighbourhood centre	Construction never completed (Superseded by No. 11 below)	743 No. units
B	SD13A/0178 SD14A/0103	10/04/2014 11/07/2014	Primary School (24 No. classrooms) Primary School (2 No. classrooms)	Refused Granted	N/A
C	SD18A/0035	29/03/2018	Equestrian Centre	Granted	N/A
1	SD18A/0401 (ABP Ref. 305665-19)	30/05/2019	Apart-hotel	Refused	N/A
2	SD20A/0192	06/11/2020	Residential	Granted	11 No. units
3	SD14A/0021/EP	24/04/2020	Hotel/ Nursing Home	Note amendment to Reg. Ref. SD06A/0659 (as extended by Reg. Ref. SD06A/0659/EP) Granted	N/A
4	SHD3ABP-305343-19	29/10/2019	406 No. residential units (281 No. houses, 125 No. apartments) & creche	Granted	406 No. units
5	SD15A/0171	27/07/2016	Nursing Home	Refused	N/A
6	SD16A/0117 (ABP Ref. PL 06S.246817)	24/11/016	Residential	Granted	48 No. units
7a	SD15A/0193	27/11/2015	Residential	Granted	70 No. units
7b	SD17A/0288	10/10/2017	Residential	Revisions to previously approved residential scheme under reg. ref. no. SD15A/0193	24 No. units
8	SD19A/0040	10/10/2019	Residential	Granted	28 No. dwellings
9	SD20A/0037 SD20A/0343		Retail, Warehouse and Ancillary Office	Granted Pending	N/A
10	SD18A/0363 (ABP Ref. 304908-19)	09/01/2020	Residential	Granted	22 No. units
11	SDA17A/0010 (ABP Ref. PL 06S.248760)	18.12.2017	Residential	Granted	20 No. units
11a	SD20A/0314		Residential	Request Additional Information	2 No. units
12	SD20A/0312		Residential	Request Additional Information	9 No. units

Table 3.2: Summary of Planning Applications Lodged and Determined in Vicinity of Subject Site Including Newcastle Town

Source: Compiled by Thornton O'Connor Town Planning, 2021 utilising South Dublin County Councils Online Planning Database.

Thornton O'Connor Town Planning's search of the planning history of Newcastle calculated that c. 629 No. units have been permitted by South Dublin County Council since the adoption of the Newcastle LAP in 2012.

The below image provides an extract from the *Newcastle LAP, 2012 (as extended)*, which identifies lands that are 'Developed' in red, 'Zoned Undeveloped Lands Subject to Extant Planning Permissions' in yellow and 'Undeveloped Zoned Lands' in green. The indicative boundaries of applications determined by South Dublin County Council during the lifetime of the current Development Plan are also overlaid.



Figure 3.3: Aerial Photo overlaid with an Extract from the Newcastle LAP (Indicative).

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

In understanding the planning history of Newcastle, Thornton O'Connor Town Planning have been able to identify that a significant proportion of the LAP lands envisaged for development in the Newcastle LAP, 2012 (as extended) remain to be undeveloped or subject to any planning application. These lands are identified in Blue in the next image.

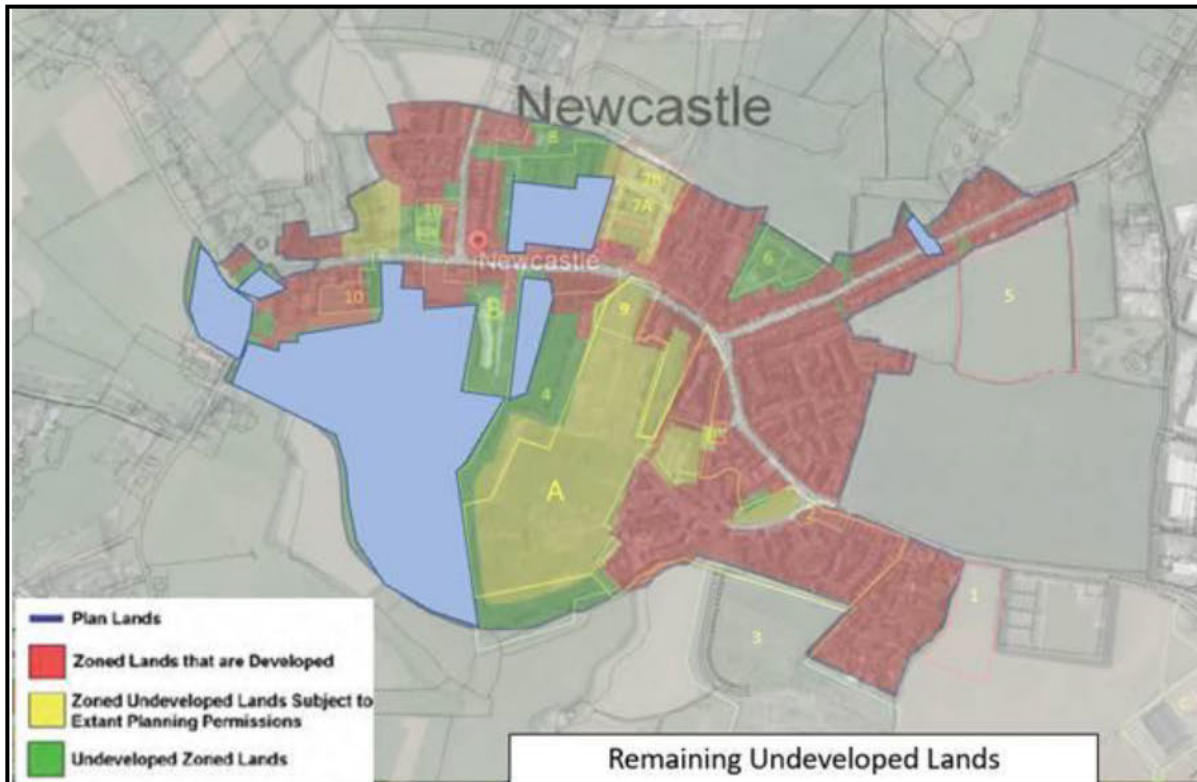


Figure 3.4: Aerial Photo Overlaid with an Extract from the Newcastle LAP identifying the Remaining Undeveloped Zoned Lands (Indicative).

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.

Key Point:

From review of the available planning application information on the South Dublin County Council online database, it is evident that a significant proportion of the Newcastle LAP lands envisaged for development have not been delivered. From a purely visual perspective, it is estimated that c. 25% of the LAP lands remain undeveloped since the adoption of the Newcastle LAP in 2012. The Local Area Plan was adopted 11 No. years ago and during the past decade there has been a buoyant economy and severe housing shortages. We respectfully suggest that ongoing landbanking issues in Newcastle are stagnating the development and adversely affecting the imbalance of supply and demand in the local area. There are many workers in the adjacent major employment nodes at Greenogue and Aerodrome Business Parks in need of accommodation within walking distance of their jobs and that accommodation is not available due to lack of supply.

3.1.3 The Opportunity for the Growth of Newcastle as a Small Town Has Not Been Fully Harnessed

The South Dublin Settlement Hierarchy identifies Newcastle as a small town, which the current Development Plan describes as:

*'largely within the Hinterland areas and yield population of 1,500 – 5,000 persons. **Levels of growth should respond to local demand** and be managed in line with the ability of local services to cater for such growth.'* [Our Emphasis].

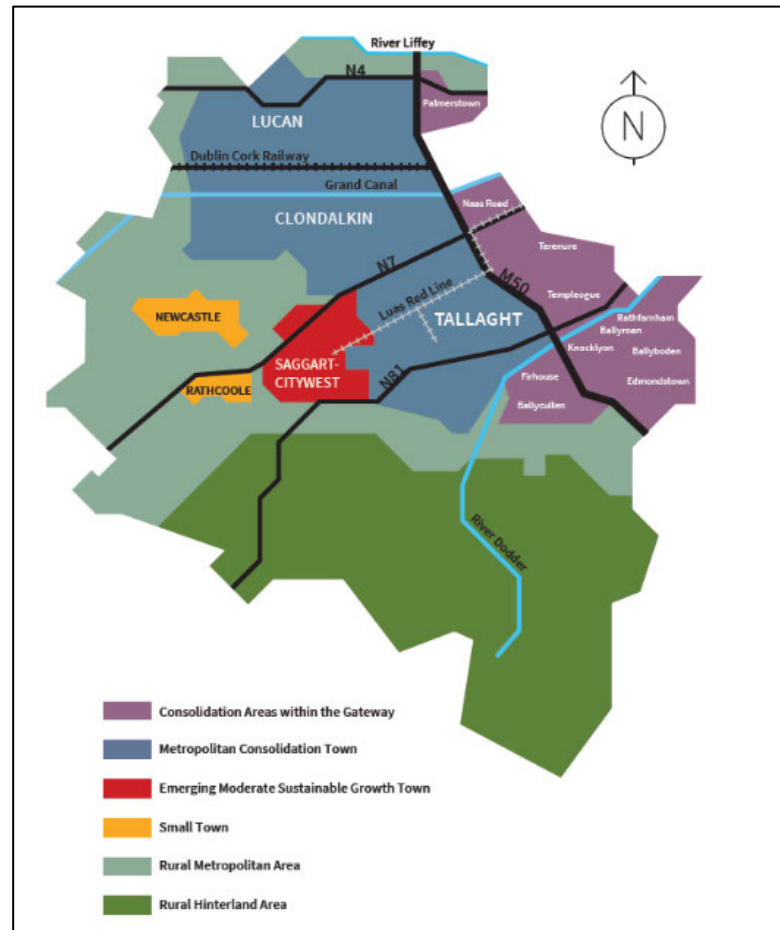


Figure 3.5: Settlement Hierarchy illustrating Newcastle as a Small Town in Orange.

Source: *South Dublin County Development Plan 2016 – 2022*, annotated by Thornton O'Connor Town Planning, 2021.

Thornton O'Connor Town Planning note that the population of the Newcastle Settlement was identified as 3,093 No. persons⁴ at the time of the 2016 Census. The *South Dublin County Development Plan 2016-2022* Core Strategy forecasted a population of 4,235 No. persons for

⁴ [Census 2016 Sapmap Area: Settlements Newcastle \(cso.ie\)](https://cso.ie/en/census2016/sapmaparea/settlements/newcastle/)

Newcastle by 2022. Therefore, substantial growth was envisaged over the Development Plan period.

Key Point:

The *South Dublin County Development Plan 2016-2022* provided an envisaged population of 4,235 No. persons for the town of Newcastle by 2022. To achieve this, the population growth would be 1,142 No. persons or 37% over the Development Plan period. To achieve this growth, substantial new build accommodation would need to be constructed and as detailed previously, land banking in Newcastle has prevented the delivery of residential units on substantial tracts of land zoned for development.

This is further emphasised by the Housing Capacity targets set out in the current Development Plan which indicates that Newcastle had 28 Ha available for residential development. It is noted there was no new lands zoned residential as part of the making of the current Development Plan (2016-2022) as summarised in Table 3.3 below.

	Total Ha	Total Units
Remaining Residential Amenity 2010 - 2016 Development Plan	28	701
New Residential and Mixed Use Zoning 2016 -2022	0	0
Total Capacity 2016 -2022 County Development Plan	28	701

Table 3.3: Housing Capacity in Newcastle (Small Town).

Source: *South Dublin County Development Plan 2016 -2022*.

Key Point:

The residential zoned lands in Newcastle as set out in the Current Development Plan have been zoned for development since the adoption of *Newcastle LAP, 2012 (as extended)*. Thus, for the past 9 No. years the town has envisaged population growth of 701 No. units. The majority of the units envisaged have not been delivered despite the clear housing shortages that exist.

3.1.4 Whilst It Is Recognised That There Is Capacity for Housing Identified In The Current South Dublin County Development Plan We Question Whether It Is Suitably Located For The Delivery of Housing?

The *South Dublin County Development Plan 2016 -2022* sets out that it is:

'policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.'

Whilst it has been established that there is remaining capacity for residential development in Newcastle, we question whether it is suitably located to satisfy the housing needs of the Newcastle population. Is the location of the zoned lands a factor in the landbanking? In comparison to the primarily backland nature of the remaining residential zoned lands, the lands subject to this document are ideally located along the central road artery to the core of Newcastle i.e., R120.

Furthermore, the subject lands form a natural connection to the Newcastle Cemetery which is currently removed from the Newcastle LAP lands. The rezoning of the subject lands would provide greater connectivity from Newcastle to this community amenity.

3.1.5 The Development of Recreational Facilities for Use by the Wider Community Will Support the Sustainable Development of the Wider Newcastle Area

We re-iterate that the subject lands are located adjacent to the Newcastle LAP boundary and would form a natural extension of Newcastle Town. The current Local Area Plan provides the following appraisal of 'Existing and Planned Community Facility Provision' in Newcastle.

SMALL TOWNS (RPGs POPULATION UP TO 5,000)	
Rathcoole (2011 population 4,019) Newcastle (2011 population 2,680)	
Community Centre	Community run public centres in Rathcoole and Newcastle. Community floorspace required under Newcastle LAP.
Local Park	Rathcoole Park; planned provision in Newcastle under Local Area Plan.
Playgrounds/Play spaces	New public play space completed in Rathcoole Park under the SDCC 5 Year Play Space Programme. Planned park provision in Newcastle under LAP to include play space.
Playing Pitches	Approximately 3 public playing pitches located in Rathcoole Park; GAA facilities in Newcastle. Planned park provision in Newcastle under LAP to include playing pitches.
Medical Centre(s)	Some healthcare facilities in the area, with access to facilities within Consolidation Towns.
Childcare Facilities	Limited childcare facilities currently located in area; facilities will be required in tandem with any population growth.

Table 3.4: Appraisal of 'Existing and Planned Community Facility Provision' in Newcastle.

Source: *Newcastle Local Area Plan, 2012 (as extended).*

As outlined at Section 1.1 of this document, Mr Con McCarthy has engaged with the local GAA club to understand their social and recreational needs. As part of any future development on the lands subject to this report, Mr Con McCarthy intends to contribute to the development of GAA and Leisure Sports facilities to provide planning gain to the local community. Specifically, it is

intended that the subject lands can facilitate a full size all weather playing pitch, two basketball courts, dressing rooms, a walking/jogging/cycling track as well as parking areas and some open space. The total area being offered for such facilities is approximately 3.2- 4 Ha out of a total site area of approximately 10.5 Ha site. Our Clients are happy to accept a Site Specific Local Objective pertaining to the lands which would require the delivery of the sports facilities in tandem with the delivery of the residential development.

The provision of community infrastructure in the form Playing Pitches and associated infrastructure is in line with Community Infrastructure (c) Policy 1 Community Centres which has an objective to:

'ensure that all communities have access to multifunctional community centres that provide a focal point for community activities.'

Key Point:

Thornton O'Connor Town Planning re-iterate that there is a significant undersupply of leisure and recreational facilities to serve the growing population of Newcastle as identified previously at Section 2.4 of this report. Mr Con McCarthy intends to provide approximately 3.2 – 4 Ha of suitable land, in addition to a financial contribution to the delivery of community facilities in the form of GAA facilities and pitches as part of any future residential development on the subject lands to address the current scarcity of leisure and recreational facilities within the Newcastle locale. Our Clients are happy to accept a Strategic Local Objective on the lands to require the community facilities to be delivered in tandem with the residential development.

A letter from St. Finian's GAA club to its members is enclosed as Appendix A of this report.

The rezoning of the lands subject to this report from 'RU' Rural Amenity to Residential will assist in strengthening the viability and sustainable growth of existing services and facilities in Newcastle by providing appropriate sequential development of lands served by public transport.

3.2 Ireland 2040: National Planning Framework

The *National Planning Framework: Ireland 2040* (NPF) is the Government's high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. Since February 2018, the National Planning Framework has replaced the National Spatial Strategy (NSS) and now represents the overarching national planning policy document. The long term vision for Ireland's housing future is to:

'balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.'

While it is acknowledged that the NPF principally promotes compact growth of brownfield and infill sites to address housing requirements it also encourages the development of greenfield lands in appropriate locations. The NPF seeks the appropriate development of suburban, greenfield sites and the avoidance of piecemeal development.

As previously discussed at Section 2.1 of this report, the subject lands are served by both rail and bus services and are well located in close proximity to the road network, most notably the N7 Naas Road.

The National Planning Policy Objective 33 sets out that development should:

'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.'

Notwithstanding the above, it is highlighted that the NPF directs development of greenfield lands towards public transport corridors, noting:

'progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburris and Clongriffin;'

Key Point:

The adoption of the NPF has placed a greater emphasis on achieving compact growth in appropriate locations with an emphasis on accessible locations and avoidance of piecemeal development. The subject lands represent the natural sequential development of Newcastle in the direction of the cemetery and employment nodes.

3.3 East & Midlands Regional Assembly – *Regional Economic and Economic Strategy 2019 -2031*

The subject site is located in the East and Midlands Regional Authority ('EMRA'). The *Regional and Spatial Economic Strategy* for the EMRA was published in June 2019. The RSES contains a number of key Regional Policy Objectives, which in conjunction with the NPF provide guidance to Planning Authorities in relation to their future plans, projects and activities requiring consent of the EMRA.

Regional Policy Objective 4.3 relates to '*Consolidation and Re-intensification*' and states the following:

*'Support the **consolidation** and re-intensification of infill/brownfield sites to provide high density and people intensive uses **within the existing built up area of Dublin City and suburbs** to ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects.'* [Our Emphasis].

The above outlined objective further reinforces the requirement for consolidation in the Dublin region.

The RSES Policy Objective 5.5 states that:

'Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.'



Figure 3.6: Dublin Metropolitan Area Strategic Plan.

Source: *Eastern & Midlands Regional Assembly: Regional Spatial & Economic Strategy 2019 -2031.*

In reference to the MASP the RSES outlines that:

'This high-level vision is underpinned by a spatial framework that supports the overall Settlement Strategy on Chapter 4 People and Place and sets out an integrated land use and transportation strategy for the sequential development of the metropolitan area, focused on:

- *Consolidation of Dublin City and suburbs;*
- *Key Towns of Swords, Maynooth and Bray;*
- *Planned development of strategic development areas in Donabate, Dunboyne, Leixlip and Greystones.'*

The key principles guiding the growth of the Dublin Metropolitan Area are listed below:

- Dublin as a Global Gateway;
- Compact Sustainable Growth and Accelerated Housing Delivery;
- Integrated Transport and Land Use;
- Increased Employment Density;
- Alignment of Growth with Enabling Infrastructure;
- Social Regeneration;
- Identify Future Development Areas;
- Metropolitan Scale Amenities; and
- Co-ordinated and Active Land Management.

Key Point:

It is clear that emerging regional planning policy recognises the importance of compact, sequential, and sustainable growth in areas such as Newcastle and also notes the importance of aligning population with housing growth. The alignment of population and housing provision in Newcastle is discussed at Sections 3.1.1 and 3.1.2.

4.0 RATIONAL FOR THE REZONING OF THE SUBJECT LANDS FROM AGRICULTURAL USE TO RESIDENTIAL USE AS PART OF THE FORTHCOMING DRAFT DEVELOPMENT PLAN

4.1 The Current Supply of Housing is Significantly Failing to Address the Critical Demand for Housing throughout the Country

There is a long-standing acute shortage of residential development throughout the country in the housing market, for both units for sale and rent. We understand that in accessing this critical shortage regard must be had to the prevailing housing trends, likewise, the impacts of Covid-19 must also be considered. We also note that in preparing any future Development Plan, South Dublin County Council will be required to carry out a Housing Need Demand Assessment (HNDA). The Economic & Social Research Institute (ESRI) in their report on the '*Regional demographics and structural housing demand at a county level*'⁵, December 2020 outlined that:

'Managing the future location, typology and tenure of housing is a key function of each local authority and requires a robust evidence base and approach to implementation.'

The research outlines that

'the Eastern and Midlands region is expected to experience the fastest population growth and to capture the majority (55.6 per cent or 514,000 people) of the total expected population growth over the 2016 to 2040 period.'

Furthermore, noting that:

'Within the region, Dublin is expected to continue to be the NUTS 3 region with the highest population share, although the Mid-East region, the area surrounding Dublin, registers the fastest population growth'

Notwithstanding the impacts of Covid-19 on Housing completions during the lifetime of the current *South Dublin County Development Plan*, the ESRI⁶ report that:

*'Despite increases over the last number of years there were still only 21,000 housing completions in 2019. This is well short of the amount of housing needed to keep up with the level of structural demand, estimated to be in the region of 30,000-35,000. Issues of undersupply are likely to be amplified by the pandemic which will hinder both investment and construction of new housing.'*⁷

The ESRI warn that the 'lagged effect' of the undersupply of housing could potentially result in '*a sharp increase in house price inflation when demand initially begins to pick up again.*'

The Report further explains that:

⁵ <https://www.esri.ie/publications/regional-demographics-and-structural-housing-demand-at-a-county-level>

⁶ Ibid

⁷ <https://www.esri.ie/publications/assessing-the-impacts-of-covid-19-on-the-irish-property-market-an-overview-of-the>

'While there has already been a fall in the number of housing completions due to reduced efficiency in the construction sector, the most significant impact on supply may not be seen for another year. In the face of a high level of uncertainty today investment is likely to be curtailed, meaning as demand starts to pick up the level of supply will not be there to meet it, amplifying the existing undersupply in the Irish market.'⁸

In considering the future of housing supply and demand, the ESRI note that:

'Ultimately, over the longer-term, this is likely to be the main impact on the housing market of COVID-19; an increase in the imbalance between the supply and demand for properties in the Irish market. Consequently, one of the most appropriate policy responses is for an increase in State provision of social and affordable housing. An increase in the supply of such housing at this point would help to reduce the extent to which the imbalance would be exacerbated by the present crisis. Ultimately, facilitating cheaper, more efficient housing supply is the primary policy concern in the housing market over the medium term.'

The Daft.ie House Price Report, *An analysis of trends in the Irish residential 2020 sales market for Q4 2020* reports that:

'Combined with the fall in the construction of new homes, this reduction in the volume of homes coming on to the market has translated into unprecedented scarcity of homes for sale.'⁹

Furthermore, stating that:

'In Dublin, for example, where there were 20% fewer homes available to buy on December 1 this year compared to the same date in 2019, average list prices rose by 7.2% year-on-year.'

Research carried out by the Property Industry, entitled *'Estimating Ireland's long-run housing demand'*, dated April 2019¹⁰ outlined that:

'By 2051 the number of households in Ireland is projected to reach close to 2.8 million'

The research highlights that:

'New household formation averages nearly 32,000 per annum between 2019 and 2051'

An extract from the report clearly illustrates that the number of household formations are expected to drastically increase in the period of 2021 – 2026 before gradually decreasing.

⁸ <https://www.esri.ie/publications/assessing-the-impacts-of-covid-19-on-the-irish-property-market-an-overview-of-the>

⁹ https://www1.daft.ie/report/ronan-lyons-2020q4-dafthouseprice?d_rd=1

¹⁰ <https://propertyindustry.ie/Sectors/PII/PII.nsf/vPages/Publications~estimating-irelands-long-run-housing-demand---april-2019-05-04-2019!OpenDocument>

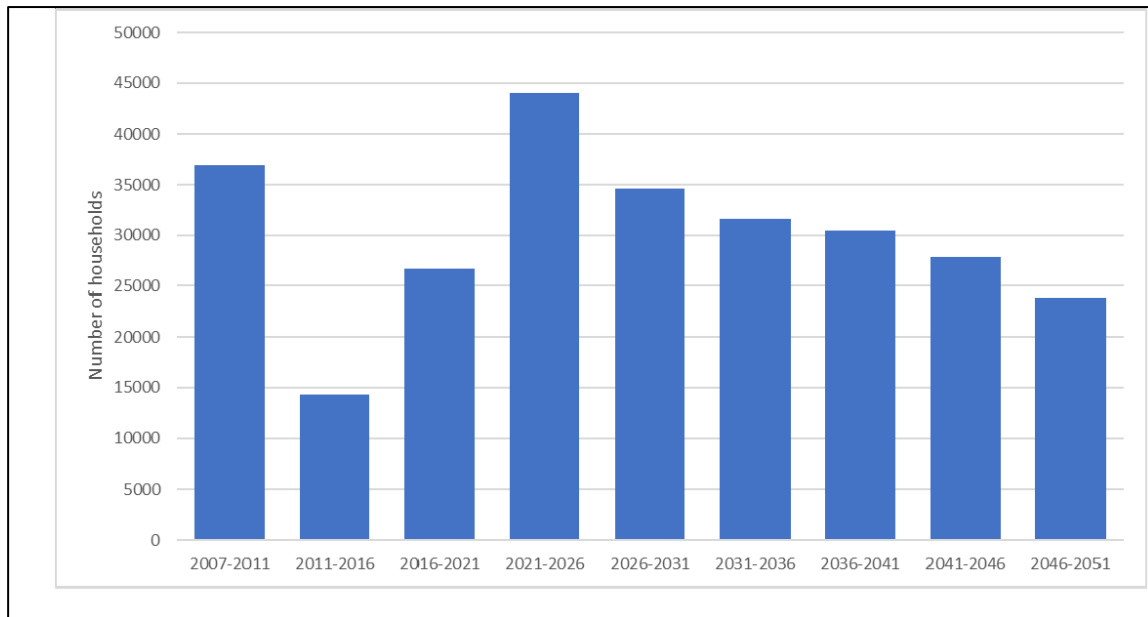


Figure 4.1: Long Run Projections of Ireland's Housing Demand.

Source: *'Property Industry Ireland: Estimating Ireland's long-run housing demand, April 2019'.*

In considering the aforementioned demand for housing units, Thornton O'Connor Town Planning refer to the Daft.ie Q4 Housing Report (Q4 2020) which highlights the following key emerging trends:

- *Prices nationally in the final quarter of 2020 were 7.4% higher than the same quarter a year previously, the largest one-year gain since late 2017.*
- *While prices rises and falls over the last decade have typically shown regional variations, all major regions have year-on-year growth close to the national average.*
- *The total number of properties available to buy on December 1 was less than 15,400, the lowest figure for stock nationally since August 2006.*

An extract from the report is provided which illustrates the average prices and annual increase from Q4 2019 for the Dublin regions. South County Dublin, which is the focus of this report, experienced the greatest increase and has the highest average sale price.

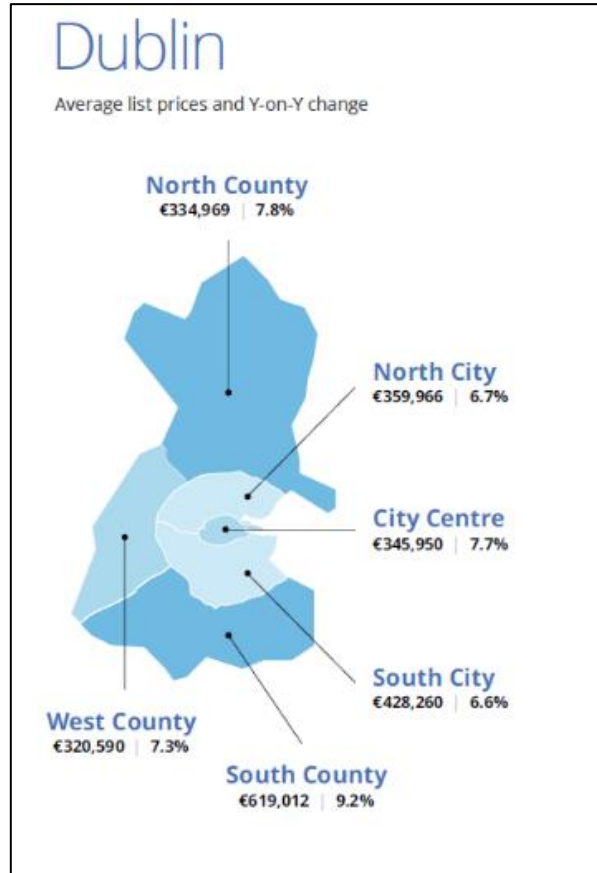


Figure 4.2: Extract from the Daft.ie Q4 (2020) Housing Report.

Source: https://www1.daft.ie/report/ronan-lyons-2020q4-dafthouseprice?d_rd=1

A report prepared on behalf of the European Commission entitled '*Housing Affordability in Ireland*' dated December 2020 outlines that:

'The number of second-hand properties available for sale and rent has shrunk since 2012, reflecting limited supply. According to Daft, a property search website (8), the stock of second-hand properties available for sale remains well below the peak-levels observed in 2009-2011 (Graph 5).'

A graph representing this trend is provided below for reference:

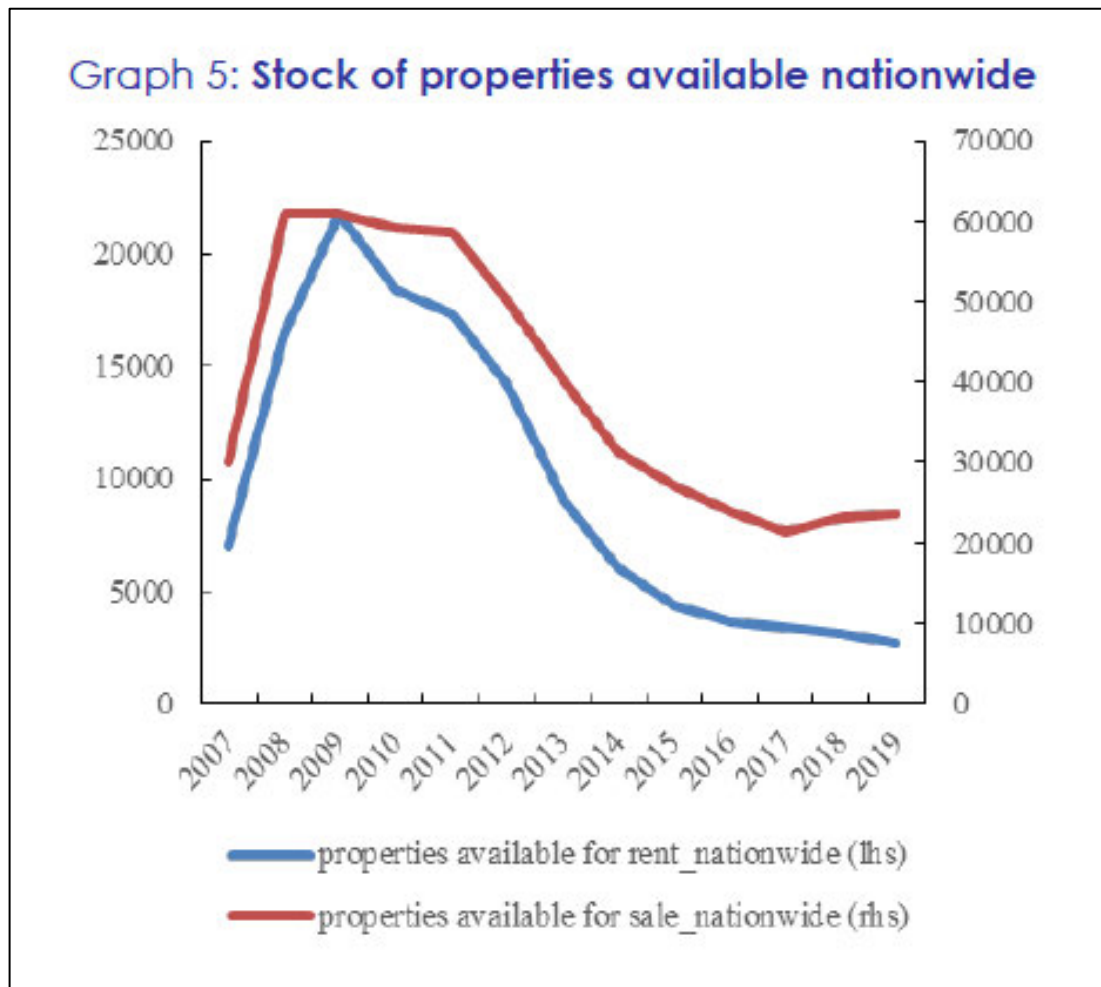


Figure 4.3: Stock of Properties Available Nationwide.

Source: Housing Affordability in Ireland, December 2020 (European Commission).

In regard to housing completions, the report highlights that:

'Construction was mainly concentrated in urban areas where demand is higher. Around 76% of the dwellings completed since the beginning of 2016 were built in urban areas. The majority of completions was concentrated in Dublin (37%) and surrounding counties (Meath, Kildare and Wicklow), which accounted for 21%.'

Crucially the European Economy Economic Brief (Issue 061), December 2020¹¹ highlights that 'despite the pickup in residential construction, housing shortages were significant in 2019' stating that 'Before the COVID-19 outbreak, real housing demand in Ireland was estimated to range between 32,000 (Duffy et al., 2016b and Ibec, 2019) and 50,000 units per year (Lyons, 2018).

¹¹ ec.europa.eu/files/economy-finance/ebo61_en

The report also highlights the following key points:

- Dublin city and its suburbs accounted for 74% of the estimated demand of Dublin, Cork, Limerick, Galway and Waterford
- The number of housing completions were well below the real demand for estimated before the Covid-19 pandemic.
- The Covid-19 pandemic is anticipated to slowdown housing completions in 2020 by c. 25% to 16,000 No. units.

As such, the report highlights that:

'Given the supply shortages Ireland faced before the COVID-19 outbreak, the collapse in housing completions in the first half of 2020 may put additional upward pressure on house prices when the economy recovers, exacerbating the affordability issues that existed before the pandemic.'

In the Ministerial Letter to Local Authorities entitled '*Structural Housing Demand in Ireland and Housing Supply Targets*¹², dated 18th December 2020, Minister for Housing, Local Government and Heritage, Darragh O'Brien TD stated that:

'it is now estimated that it will take up to two years just to recover ground lost due to the pandemic, i.e. by 2022, and up to three years to further ramp up to achieve required average levels of output, i.e. by 2025. This means targeting national housing output of 33,000 new homes per annum on average between 2020 and 2031, with output increasing to that figure no later than 2025.' [Our Emphasis].

Furthermore, adding that:

'It is critical to ensure that in meeting this challenge, the new homes to be built over the next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities.'

The rezoning of the lands subject to this report from 'RU' Rural Amenity to Residential Use will provide the opportunity to contribute to alleviating the ongoing housing crisis which as highlighted above has been significantly obstructed by the current uncertainty in the construction industry as a result of Covid-19.

Key Point:

Recent research indicates an escalating demand for suitable housing for a growing population that is not being met by the current supply of residential development. Covid-19 has caused further significant delays in the delivery of housing which is expected to have prolonged and profound impacts including spiraling affordability issues.

¹² gov.ie - Ministerial Letter to Local Authorities - Structural Housing Demand in Ireland and Housing Supply Targets (www.gov.ie)

4.3 Newcastle is Strategically Located in Close Proximity to a Range of Large Employment Nodes in South Dublin that Are Continuing to Expand As Evident in Recent Market Research

The subject lands are excellently located in close proximity to a range of employment nodes in South Dublin County as illustrated previously at Figure 2.3. Most notably, Greenogue Business Park is located within c. 400 m of the subject lands. Greenogue Business Park, in addition to the Aerodrome Business Park are significant employment centres in South Dublin with c. 400 No. companies of varying scales.

In addition, the Citywest Business Park is *'home to over 200 indigenous and world-wide companies, this unique environment provides the perfect setting for business to thrive which has resulted in its reputation as a global centre of excellence'*¹³. The subject lands are evidently located in close proximity to a large amalgamation of industrial, logistics, manufacturing and employment lands in south-west Dublin.

The currently adopted *Development Plan* outlines that:

'South Dublin County has a strong and diverse economic base. The county is home to 6,823 business entities and almost 78,000 jobs.'

Key Point:

Thornton O'Connor Town Planning highlight that in contrast to the lack of residential development in the Newcastle area, there has been significant investment in warehousing, logistics and industrial development in the surrounding Business Parks during the lifetime of the current *Development Plan* which will result in a significant uplift in the number of workers in this area of South County Dublin. A map identifying the location of recently permitted (green) and pending (orange) warehousing, logistics and industrial development is provided below for reference.

¹³ Citywest - Home

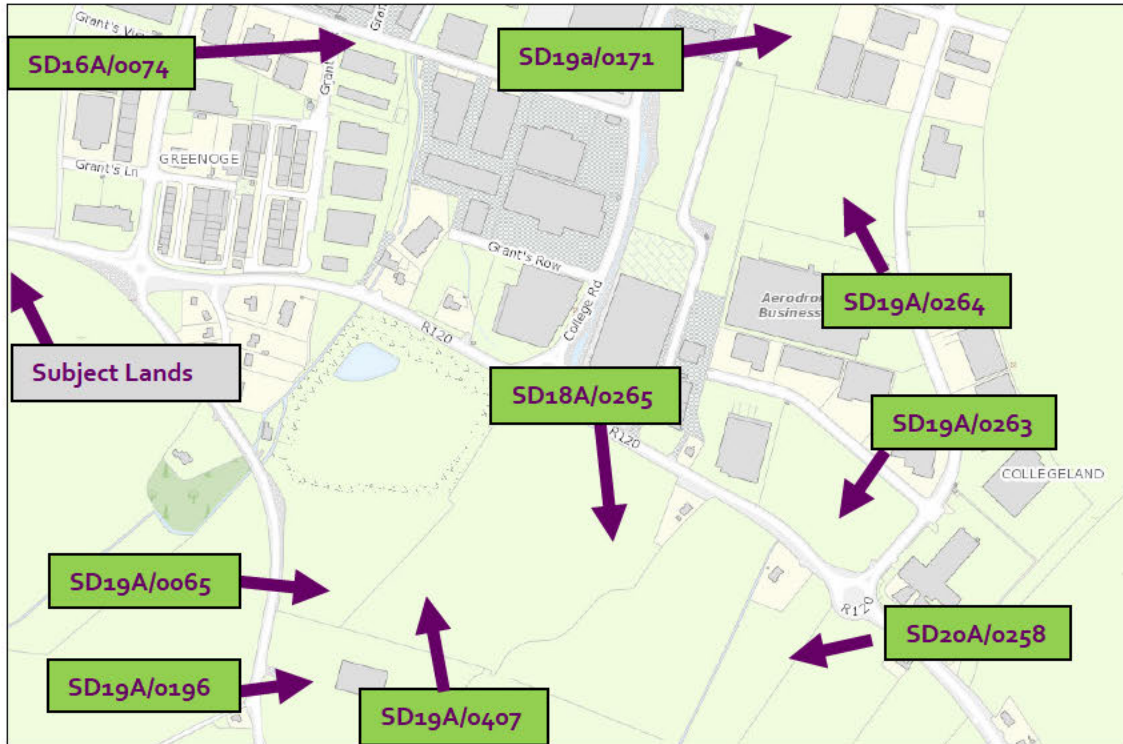


Figure 4.4: Map Showing the Location of Relevant Planning History for Employment Uses in the Vicinity of the Subject Site [Indicatively Denoted by Red Star]

Source: www.myplan.ie, annotated by Thornton O'Connor Town Planning, 2020

The *Dublin Industrial Market Report – Q4 2020* published by Jones Lang La Salle¹⁴ provides an insight into the Industrial and Logistics market. It outlines that:

'Despite the Covid-19 crisis, there is evidence that rental levels have grown by 5% in 2020 due to the heightened demand for space and the limited amount of supply coming to the market.' [Our Emphasis].

Research carried out by Savills in December 2020¹⁵ corroborates these findings, noting that:

'Occupier demand for Industrial and Logistics space bounced back significantly after the first lockdown and interest continued into Q3 with 376,680 sq m of requirements recorded by Savills between July and Sep compared with just 107,500 sq m recorded between March and May. There has been a significant increase in enquiries for units larger than 1,000 sq m with 49 enquiries in September compared to only 25 in July.' [Our Emphasis].

Furthermore, the *Dublin Industrial Market Report– Q4 2020* highlights that:

¹⁴ <https://www.jll.ie/en/trends-and-insights/research/dublin-industrial-market-report-q4-2020>

¹⁵ <https://www.savills.ie/research-and-news/research.aspx?rc=Ireland&p=&t=&f=date&q=&page=2>

*'After a slow Q2, industrial take-up volumes strengthened in the second-half of 2020. The continued public health crisis and Brexit **have heightened the need to elevate chain risk mitigation and source diversification to create greater resilience in future crises.**' [Our Emphasis].*

We note that the *Dublin Industrial & Logistics MarketView, Q4 2020* highlights that the:

*'Transactional activity in the industrial & logistics sector during Q4 2020 was **primarily focused on the Dublin South West (N7) and Dublin North East (M1) corridors**, which respectively accounted for 62% and 13% of quarterly take-up in Dublin in the quarter.*

***For the year as a whole, the Dublin South West (N7) district accounted for the largest proportion of activity in this sector (46%)'** [Our Emphasis].*

Savills anticipate continued growth in the Industrial market and highlight that:

*'despite Covid-related headwinds, the **Industrial and Logistics market has remained relatively robust**. Looking at the market fundamentals Ireland has a growing population and a return to annual growth in personal consumption expenditure has been forecasted by the Central Bank for 2021. As such we would expect to see the recovery continue into the new year.'* [Our Emphasis].

In addition, Savills highlight that:

*'the greatest challenge to take-up was not Covid but a **lack of suitable space for potential occupiers**.'* [Our Emphasis].

This is further corroborated in a recent Irish Times article entitled *Investors eye purchase of €78m worth of Dublin logistics assets*¹⁶ dated 3rd March 2021 which states:

'With the Covid-19 pandemic serving to accelerate the growth of e-commerce and with traditional supply chains under pressure as a result of Brexit, the competition among international investors for industrial and logistics assets in Dublin and beyond shows no sign of relenting.'

Key Point:

Thornton O'Connor Town Planning note that Newcastle is strategically located in close proximity to a range of large employment nodes in South Dublin that are anticipated to continue to expand as evident in recent market research. The provision of residential development to accommodate a growing workforce is integral to the continued and sustainable growth of this area of South Dublin.

¹⁶<https://www.irishtimes.com/business/commercial-property/investors-eye-purchase-of-78m-worth-of-dublin-logistics-assets-1.4499228>

5.0 THE REZONING OF THE SUBJECT LANDS CAN ASSIST IN DELIVER OF HOUSING AND CONTRIBUTE TO THE GROWTH OF NEWCASTLE AS A SMALL TOWN IN ADDITION TO DELIVERING COMMUNITY SPORTING FACILITIES THAT ARE URGENTLY NEEDED

As detailed throughout this report, the subject lands are positioned in a highly accessible location between Newcastle and Greenogue Business Park. The future development of the subject lands will represent the sequential development of available lands in Newcastle to contribute to alleviating the demand for housing in South County Dublin.

As outlined at Section 5.0 of this report, the full potential of residential zoned lands in Newcastle was not realised during the lifetime of current Development Plan. Section 3.1.2 of this report outlined that although the Development Plan set out the requirement for '*32,132 additional housing units in South Dublin County over the 7 year period from 2015 – 2022*' only 6,210 No. units were completed which is significantly less than that required.

We acknowledge that the aforementioned figures pertain to South Dublin County as a whole however in considering that the extent of undeveloped zoned lands that remain within the Newcastle LAP boundary following a c. 10 No. year period, it can be reasonably assumed that the majority of the targeted supply of housing for Newcastle has also not been achieved.

The rezoning of the lands subject to this report from Objective 'RU' use (to protect and improve rural amenity and to provide for the development of agriculture) to Objective 'RES-N' (to provide for new residential communities in accordance with approved area plans) and to extend the boundary of the Newcastle Local Area Plan would be in the interests of proper planning and sustainable development through the sequential development of lands to the east of Newcastle towards Greenogue Business Park. Residential development at this location would provide great opportunities for sustainable commuting to existing employment zoned lands in the vicinity.

The development of the subject lands will also allow the community of Newcastle to extend to the cemetery to the east of the town – filling in the 'gap' in frontage that currently exists. The cemetery is a key location for social, community and religious gatherings by town residents.

Mr Con McCarthy has engaged extensively with the GAA and is offering to develop major sporting facilities in tandem with the delivery of the residential lands to offer community gain to the town of Newcastle and wider South Dublin area. The delivery of the residential lands will assist in funding the sporting infrastructure.

6.0 CONCLUSION

The purpose of this Submission to the *Draft South Dublin County Development Plan 2022 – 2029* is to demonstrate the cogent rationale for the rezoning of the subject lands from their current Objective 'RU' use (to protect and improve rural amenity and to provide for the development of agriculture) to Objective 'RES-N' (to provide for new residential communities in accordance with approved area plans) and the associated extension of the boundary of the Newcastle Local Area Plan to incorporate the subject lands and the adjacent cemetery that serves the town.

At a time of an acute housing crisis, lands zoned for new residential development in Newcastle has not been forthcoming to an extent that meet the demand envisaged in the current *Development Plan* and within the *Newcastle LAP, 2012 (as extended)*.

It is considered that the subject lands are ideally located for residential zoning having regard to their location between the existing built environment of Newcastle and Greenogue and Aerodrome Business Park. The subject lands have the potential to provide residential development, in addition to community facilities to enable the growth of Newcastle as a Small Town. The rezoning of the lands will support this area of South Dublin as key area of employment by providing residential accommodation for employees, furthermore, consolidating the community and supporting the viability of Newcastle.

We would be very happy to meet with you to discuss this proposed rezoning and the role that the subject lands can play in the future development of Newcastle, Co. Dublin.

Yours Sincerely



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning



Appendix A: Letter from St. Finian's GAA Club to its Members, dated January 2021

ST. FINIANS G.A.A. CLUB



NAOMH FINNÉIN C.L.G.

ESTABLISHED 1943

SPONSORED BY

Greenogue

Aerodrome



Alymer Road,
NEWCASTLE,
CO. DUBLIN.

January 2021

Hi All,

I hope this letter finds you and your families well during this difficult time. I want to give our members an update on the current position in the club with regarding our pitch facilities. As I have outlined at AGM's over the last 3 years the club is in a healthy position with great growth in the juvenile section and new members joining the club. This positive growth brings challenges and stresses to the playing facilities in our club. We now have over 16 teams and a nursery section training weekly on the pitches. This inevitably has an effect on the durability and quality of our pitches and creates challenges for teams.

The committee has been working hard over the last 3 years trying to secure land adjacent to the club to extend our playing facilities but unfortunately this option is not available at present. As it stands there is no green space or park space allocated to any playing pitches in Newcastle. To that end, I contacted Con McCarthy to see if there was any land or solutions he had to help the club.

I mentioned at the AGM that we have a proposal from Con McCarthy to make land, (and funds), available to the club and the community. This would allow St. Finian's to develop some badly needed facilities. The proposal as shown on the attached schematic would include a full size all weather playing pitch, two basketball courts, dressing rooms, a walking/jogging/cycling track as well as parking areas and some open space. The total area being offered for such facilities is approximately 10 acres out of a total site area of approximately 30 acres. Con has also agreed that he will donate a sum of €500,000 to enable the club to have funds to match grants and lotto funding thus making it possible to develop the site. The remaining area of the site would be used for housing. This is the element that pays for the facilities.

The committee are supportive of the proposal that is being presented and I outlined this proposal to members at the AGM. I have discussed this proposal at length with Con. I have presented this plan to the committee at numerous committee meetings and through these meetings and presentations there have been a few key questions which I have found myself answering, I have outlined below my answers to these questions and the reasons why I believe it is crucial for the club to support this proposal.



ST. FINIANS G.A.A. CLUB

If this were to happen when could it happen?

This proposal would have to be incorporated into the County Development Plan. This plan is reviewed every six years and the last review was completed in 2016. It is now under review again and the current review will be completed in 2022. After that it would probably take a year to 18 months to develop.

Some people will consider this to be a so called ‘developer led’ proposal and not to be supported. What do you say to that?

Firstly, I would say that it is not developer led. It is led by the chronic demand in the GAA club and in the wider community for more playing facilities for a growing young population. It is led by St. Finian’s search for such facilities. This is led by Con’s desire to do what he can to help facilitate the growth in the club and with that, support the tireless volunteers in clubs like St. Finian’s GAA. Con has outlined to me that he would not be making this proposal to club members if the demand for space and playing facilities was not there.

If there are concerns that people say it is a developer led project, I would say that despite common perception so called developer led plans are not always wrong. If we look to the newly established facilities that Peamount United now have as a result of the deal that was proposed by Con, it can give us some insight into what this project might deliver. A development such as what is being proposed would not have been readily delivered by a local authority. It is evident that Peamount United have excellent facilities and that Con had a vital role in insuring they were delivered as planned and agreed.

The proposal includes some land for more houses. Only 10 out of the 30 acres is proposed for the sports facility Why?

The answer is simple; somebody or something must always pay the bill. In this case the development of the remainder of the site makes it financially possible to deliver the plan. This is ultimately the trade-off. Some people will argue from a principled point of view that this is not the way to do things. I respect that opinion but, the reality of waiting for somebody else or some other process to deliver on this means it might never happen. The challenge of green space and playing facilities that faces our club and the children in Newcastle in general is an imminent issue. This proposal aims to address these issues with the children and population of Newcastle benefiting in the process.

One would have to consider the effect of waiting for another proposal from another developer, or from the local authorities on delivering green space and the reality is that another generation of children will miss out on this community facility. The children in St Finian’s school today or those that will start school in the next few years are the ones who will miss out on the use of this facility.

I have asked Con on the number of proposed houses that might go on the site. However, the reality is that the number of houses that might go on this site would make little or no impact on the numbers already built, or currently being built in Newcastle. If we move forward with this, Con would be providing a planning report which will demonstrate that from a Newcastle perspective and from an overall County Development Plan perspective, the housing element of the proposed development would not be very significant one way or the other, but would none the less comply with planning policy.

It is of course possible that those opposed to this plan could make a coherent planning argument against it and they could make the discussion entirely about the housing element. If this is the case then I would be disappointed on the basis that they

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ST. FINIANS G.A.A. CLUB

have not taken into consideration the overall benefit to the local community. There is no doubt that this facility could have an extremely positive impact for the people in Newcastle.

Zoning Condition

I asked Con, how we guarantee that if the land is rezoned that all the land is not used for housing, which can be done. If the Councillors agree to re-zone the site it can be done with what's called a specific local objective, (SLO for short), attached. As the name implies an SLO is a mechanism in the process of making the County Development Plan that specifies particular things that must happen on specific sites. In this case the SLO could say the following;

"The site for the sports facilities must be transferred to a community-based sports organisation before any planning application is made on the balance of the site."

This would guarantee what's intended to go on that area of land that has been zoned. This SLO will be attached as part of the proposal.

There is already too much traffic and will this proposal not just add to the problem?

Ultimately this is for the planning authorities to access. However, that said, unfortunately peak time traffic is a problem everywhere in and around Dublin

Most of the current traffic problems that we have in Newcastle are not caused by people living in Newcastle. Of course, additional house may contribute to the problem but by far the biggest issue is through traffic.

If the Club and the community went along with this plan how can they be sure that it would be delivered, and we would not end up with just the houses?

If Con is to make a formal proposal to the Council he will be making it with a condition attached that no planning application can be made on the housing part of the site until proof is provided to the local authority that the sports facility land and the money is handed over to the community.

Is this to be a GAA club facility only?

No, this facility is for the community of Newcastle. If this proposal comes to fruition access will be provided to anyone who wants to play GAA and to people who want to play other sports including basketball, and to walkers, joggers and cyclists. I see this as a community facility and not just a GAA facility that will be of benefit to all in the community.

Who ultimately decides whether this proposal is adopted into the Development Plan?

Ultimately, the decision will be made by elected Councillors on South Dublin County Council who own the development plan. They decide what is included and excluded from the development plan. They of course take advice from the planners in the County and take this advice into consideration when developing the plan.

What would the GAA club have to do if to make this happen if the members support the plan?

Con has outlined that he will only make a formal proposal if the GAA club and the wider community want this to happen. If the club does not support the proposal, then that will be the end of it. However, if the club wants this to happen we will need to do what is necessary to demonstrate that there is widespread support in the community of Newcastle for the plan.

Chairperson: Ian Boran

Secretary: Mairead O'Connor

Treasurer: Michael Dowling



ST. FINIANS G.A.A. CLUB

I personally will be disappointed if this does not happen as I can see all the benefits that the current and future families could benefit from this sporting facility. Con will not be making the proposal for inclusion in the Development Plan if a majority of the Club or the community are opposed.

Speaking to Con, his motivation is entirely about delivering what I know would be a wonderful and badly needed facility for the Club and the Community of Newcastle. Con has given over 25 years support to the club and I know the members and the community are extremely grateful for all the support he has given to our sports clubs in the local community.

If this is to happen the role of the Club and wider community need to elicit the support from our local councillors to make it happen. There is obviously some time and hard work involved in this for a committed group in advancing this exciting proposal. Without a facility like this I fear the work of the volunteers in the club is going to be even more difficult given the growth in membership we envisage going forward and the lack of playing pitches.

What needs to happen next and when?

I would like to establish the following in the coming months if this is something the club are willing to support.

- January 2021 Determine if the club supports the initiative.
- February/March 2021 Gain the support of the Wider Community in Newcastle.
- April/May, 2021 Speak to councillors and convince them of the merits of this proposal for the community.

I have attached the drawings with this letter to give you an idea on the location and scale of the proposed community facility. I encourage you to provide feedback to me as a member of the club, whether it be positive or negative, so that we ensure we build a club which we can all be proud of in the years to come.

Le Méas



Ian Boran

Chairman

Chairperson: Ian Boran
Secretary: Mairead O'Connor
Treasurer: Michael Dowling



