

2021

# Draft South Dublin County Development Plan 2022-2028

## Public Consultation Submission

This Public Consultation Submission has been prepared on behalf of Bill Dowling, seeking consideration of a land-zoning change from Objective EE 'Enterprise and Employment' to Objective RES-N 'New Residential' at lands known as Green Isle Business Park, Old Naas Road, Clondalkin, Dublin 22



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## 1 Introduction

This submission has been prepared on behalf of Bill Dowling, Green Isle Business Park, in response to an invitation to comment on the forthcoming Development Plan for South Dublin County Council to cover the period 2022 to 2028.

The Draft Plan is on public display online from July 7th 2021 to September 15th 2021 inclusive.

The public have been invited to view and have their say on the Draft County Development Plan. Formal submissions / observation to the Draft Plan are to be made in writing via the on-line consultation hub.

This submission to the South Dublin County Plan 2022-2028 will set out the location and context of the subject site, recent planning history and proposed future development of the site.

This submission will outline the key provisions they request to be included in the new County Plan, namely a rezoning of part (c.0.5 ha) of Objective 'EE' lands to Objective 'RES-N' "*to provide new residential communities in accordance with local plans*" at Green Isle Business Park, Old Naas Road, Clondalkin, Dublin 22.

## 2 Location of the Site- Nature of Existing Development-

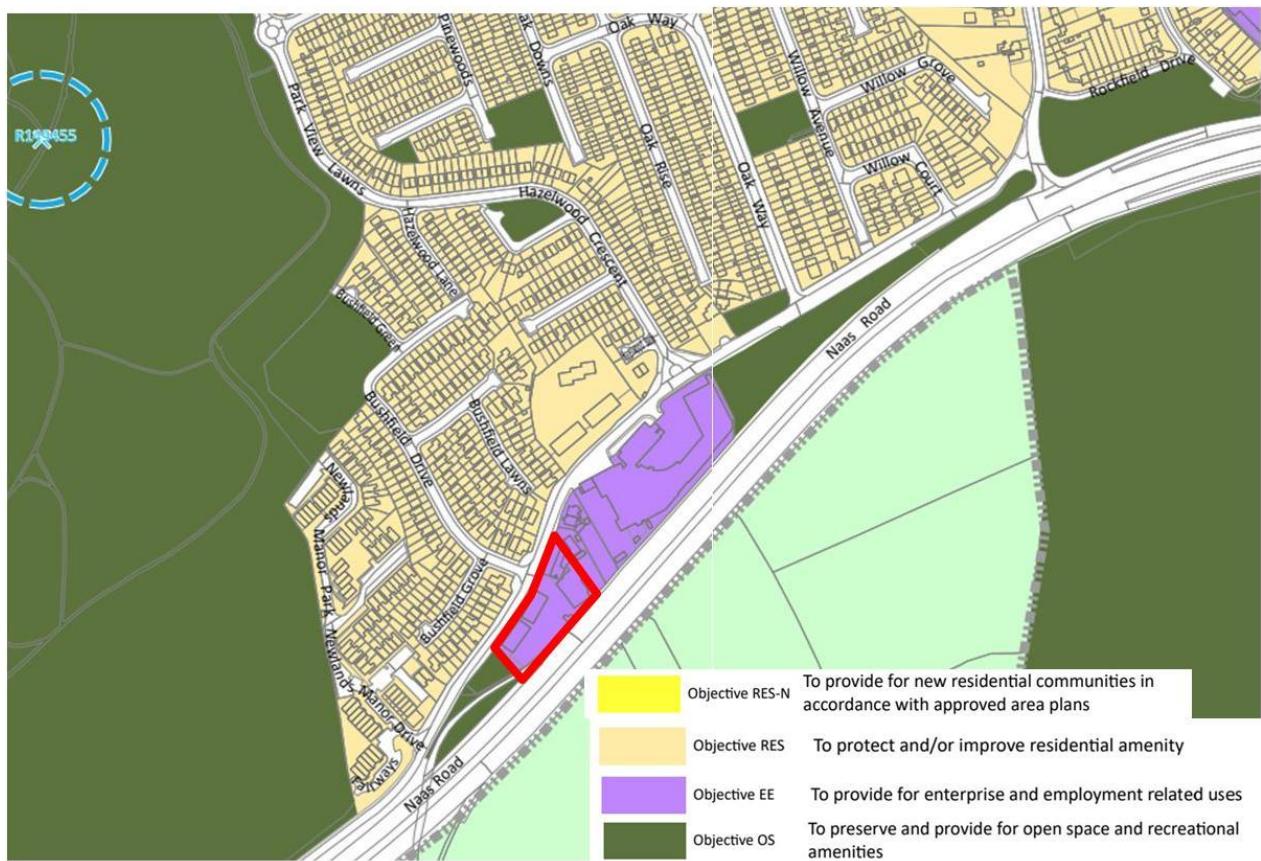


Figure 1: Current zoning context, site outlined in red



Figure 2: Street view (north) of existing Green Isle Business Park

The subject site, Green Isle Business Park, is located to the south of the Green Isle Hotel and adjacent the N7 Naas Road, situated c. 12 kilometres west of Dublin City. The site is also adjacent an established residential neighbourhood south of Clondalkin Village and Corkagh Park which offers a large variety of amenities.

The site is served by Dublin Bus routes 69 & 69x, which go every 30 minutes at peak times. This will be further improved in future with the adoption of the BusConnects plan.

The subject was re-zoned from ‘Open Space’ to its current ‘Enterprise and Employment’ zoning objective almost 20 years ago.

The Business Park currently comprises 10 no. light industrial units and substantial surface parking and paved area for vehicular circulation. Business trading from this site is transient and leases are on a month to month basis. The current businesses here range from car sales and valet, tattoo and tanning, bulky goods sales and showroom and a full day pre-school/childcare on the site.

### **3 Planning History**

A Pre-Application Consultation (Reg. Ref. PP029/21) was undertaken with planners from South Dublin County Council in relation to proposed development at this site. The proposal seeks residential development of c. 90 apartments contained within 5-6 storey building.

The Applicant was informed that:

*“The planning proposal for the subject site at present is premature as the proposal is in an area not zoned residential. The applicant would benefit from a Pre-Planning further down the line. The applicant is reminded that the zoning change cannot be guaranteed.”*

Now that the Draft Stage 2 Public Consultation process, this submission seeks to change the current zoning objective to one that permits new residential development at the subject site.

#### **Reg. Ref. SD20A/0021**

Planning permission was granted in October 2020 at Unit 1, Green Isle Business Park, Old Naas Road, Clondalkin,

“Change from preschool and after school sessional childcare centre to full day preschool and after school childcare centre with opening times from 7:30am to 6:30pm accommodating 32 children; change of use of the indoor play area to classroom and all ancillary works.”

## 4 Draft Development Plan Review

A plan led approach to identifying housing needs and supporting the sustainable growth of urban and rural communities has been developed through the Core Strategy and the Housing Strategy of the Development Plan.

The Vision of the Core Strategy is to:

*“Maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands.”*

Housing is recognised as a fundamental provision for all citizens. It is also the cornerstone in forming sustainable communities. South Dublin had 98,387 homes in 2016. By the end of 2019 a further 4,774 homes were built with more than 4,800 units with planning permission not yet built.

South Dublin's population grew above the national average to 278,767 persons in 2016. National and Regional Plans allocate a further 50,000 people to live in South Dublin between 2016 – 2031 with further compact growth potential within the county up to 2040 and beyond. This equates to growth of just under 3,500 persons per year.

Therefore, South Dublin will need almost 18,000 new homes by the end of 2028, over 2,000 per year.

The Development Plan describes Clondalkin as a;

*“secondary administrative centre for South Dublin County and a Level 3 Retail Centre in the Regional Spatial and Economic Strategy. Its historic and wider town centre includes shopping facilities, civic and administrative services and associated commercial, cultural and community facilities. Outside of the centre, the area is characterised by low density suburban neighbourhoods that are based around a polycentric network of local retail centres. There is significant potential for development on brownfield lands adjacent to Clondalkin Town Centre.”*

The population change and density within the South Dublin Administrative Area is shown on the map below. The Electoral Division of Clondalkin Village has largely remained the same while the population in areas further west, away from the city centre, have increased by well over 20% in some instances.

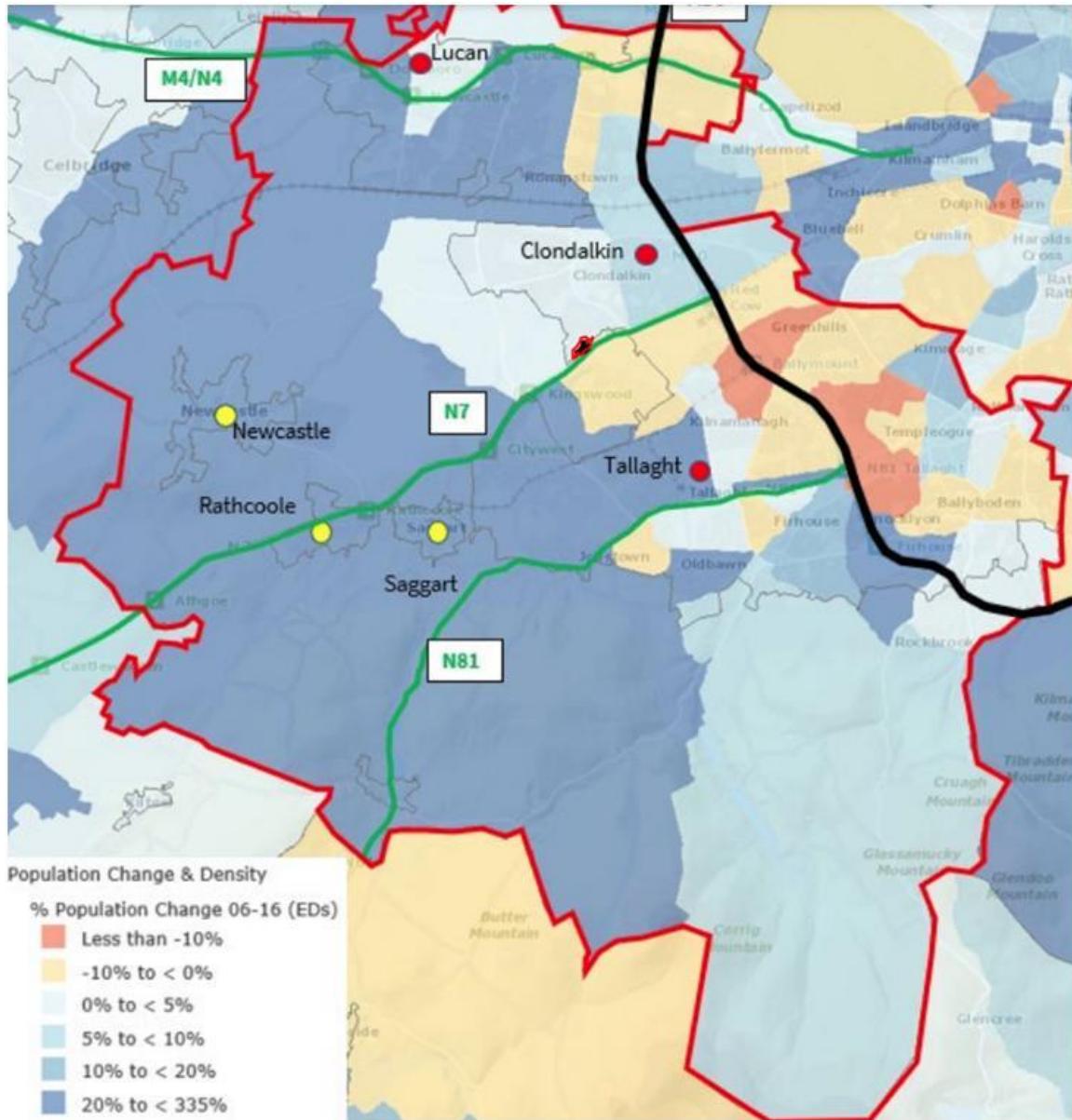


Figure 3: Population change map, source: Draft South Dublin Development Plan Volume 1

In 2016, there were 9,152 persons living in Clondalkin Village ED with 3,065 households contained within the Electoral Division boundary – just over 3% of the overall population & households within South Dublin.

## 5 National Planning Framework 2040 (NPF)

The National Planning Framework (NPF), published in February 2018, sets out a strategic development framework for the Country to 2040. The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

As a strategic development framework, the Plan sets the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional and local levels.

Under the heading of 'Compact Growth', the NPF is:

***Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including 'infill' and 'brownfield' and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport".*** [Our emphasis]

A recurring theme in the Plan is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. The NPF estimates that Dublin City and suburbs will grow by c. 264,000 people in the period to 2040. Ireland 2040 targets a significant proportion of future urban development on infill/brownfield development sites within the built envelope of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.

The NPF states that "*between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people's needs for well-located and affordable housing, with increasing demand to cater for one - and two-person households. Within this figure, there is a wide range of differing housing needs that will be required to be met*".

With particular respect to housing and community development, National Policy Objective 33 of the NPF has the following stated objective:

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

The NPF also provides that "*To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities*" (National Planning Framework, 2018, p.93).

Residentially zoned lands here would be fully consistent with the provisions of NPF. The redevelopment of this under-utilized suburban site would contribute to compact growth.

It is submitted that the proposal is consistent with the objectives of the NPF in seeking to consolidate and densify an urban area proximate to primary transport routes. The proposal will also provide an alternative residential format which will contribute to the overall availability of accommodation in the outer City.

## **6 Regional Spatial Economic Strategy (RSES)**

The Eastern and Midlands Regional Assembly adopted the final version of the Regional Spatial and Economic Strategy (RSES) in late June 2019. The RSES is a strategic plan and investment framework to shape the future development and to better manage regional planning and economic development throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives.

The RSES makes note of the need for the intensification of brownfield sites in the existing urban areas. This is set out in the Regional Policy Objective 4.3:

*“RPO 4.3: 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 and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

The RSES also highlights that the recent trends in the delivery of specialised housing typologies, indicative of the change in approach that will be necessary to accommodate the changes in demand and demographics in the Region into the future. We support that a residential zoning on this site would revitalise this area and would be consistent with the policy objectives of the RSES.

## 7 Requested Designation in Forthcoming Plan

It is requested, that the current 'EE' zoning of the site be changed to 'RES-N' zoning to provide for new residential development on the site.

In relation to the current zoning of the site, we consider that the employment use generated from this site to be considerably small having regard to the low density design of the business park and the low intensity employment uses currently contained on site, i.e. car sales, tanning salon.

It is also noted that a Re-zoning Submission has also been lodged by Ms. Louise Stynes O'Connor (Ref. SD-C195-26), adjoining the subject site, in relation to changing the EE zoning to residential zoning as three different families and generations reside here and they want to keep these lands in their family for years to come. See map below with the subject site outlined in red and Ms. Louise Stynes O'Connor's (Ref. SD-C195-26) site adjoining to the east outlined in yellow.

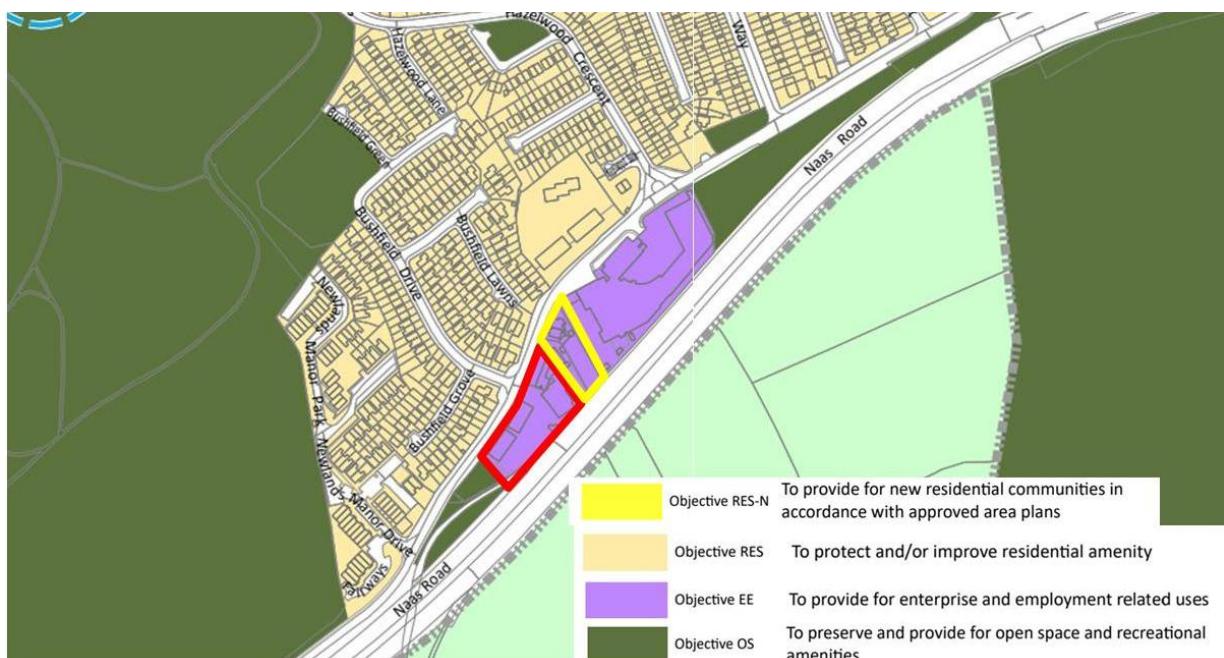


Figure 4: Zoning context map, subject site in red. Re-zoning submission (Ref. SD-C195-26) site outlined in yellow

There are further 'EE' zoned lands in close proximity to the subject site that generate much higher intensity of employment such as Kingswood Business Park, Newlands Cross Business Park, Green Isle Hotel and Louis Fitzgerald hotel.



Figure 5: Surrounding Context Map – Residential area in yellow, Enterprise & Employment areas in blue

It is noted that the NPF specifically discusses the prioritising of development lands and states that there are many other planning considerations relevant to land zoning beyond the provision of basic enabling infrastructure including overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services etc.

It is set out that weighing up these factors, together with the availability of infrastructure, will assist planning authorities in determining an order of priority to deliver planned growth and development.

The subject site is located within an established residential area, c. 1.5km south west of Clondalkin village centre. Corkagh Park, which offers a wide range of recreational amenities from camping and bicycle racing to walking and cycling along the many pathways and green areas contained within the park.

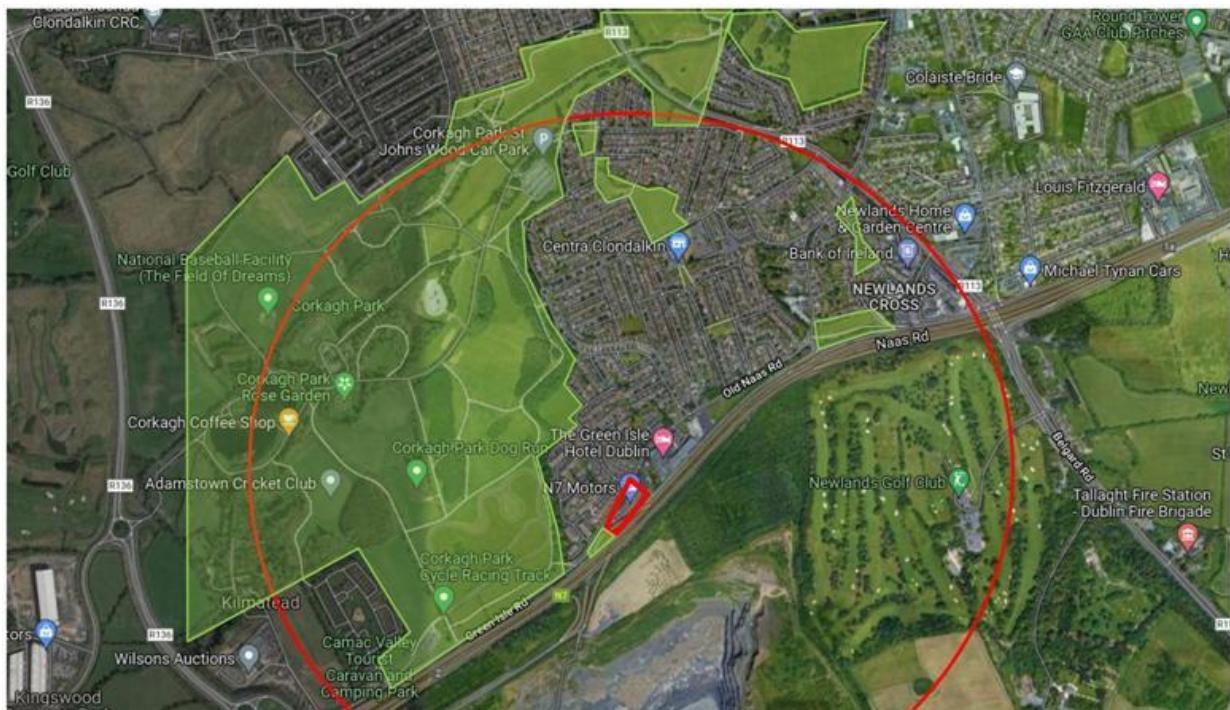


Figure 6: Surrounding Context Map – Open Green Space & Recreational amenity areas in green

It is considered that the existing Business Park is no longer fit for purpose.

We suggest the site should be reflected with an appropriate RES-N residential zoning to provide future residential development at this suitably located and under-utilized and serviced site. In conjunction with the submission made by Ms. Louise Stynes O'Connor, the residential zoning of these lands will greatly improve the residential amenity of the immediate surrounding area.

The surrounding area contains a relatively high level of schools, shops and public amenity space which would easily support new residential use at this site.

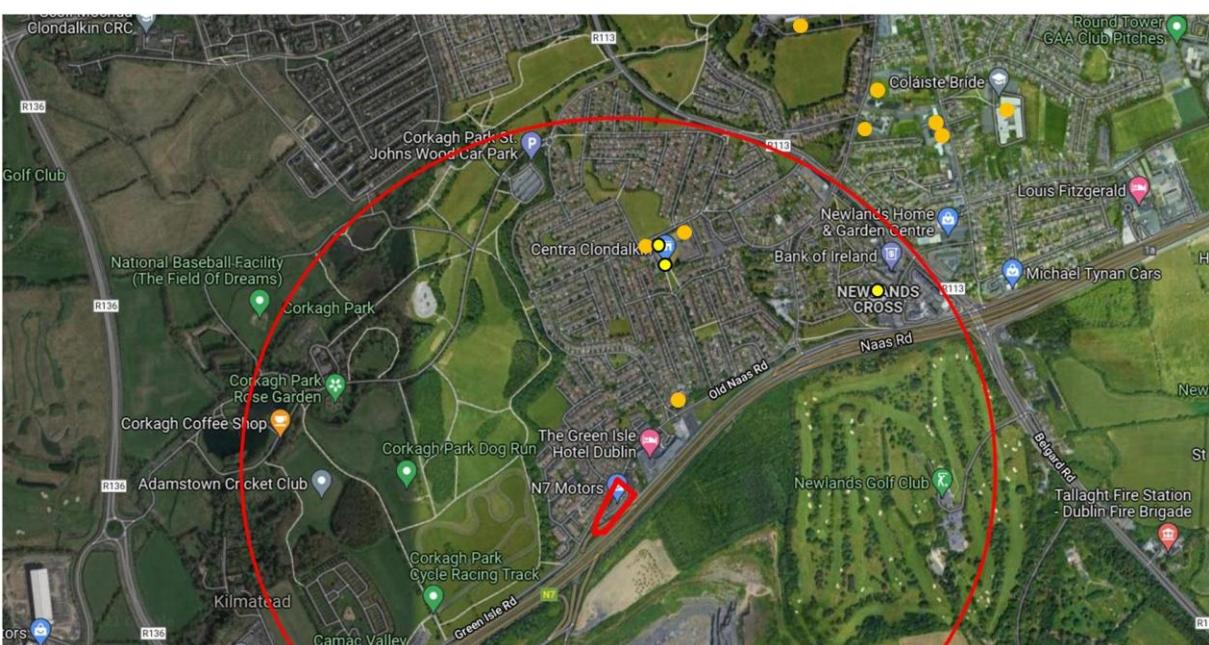


Figure 7: Surrounding Context Map – Shops/supermarkets in yellow, schools/education in orange

It is also noted that there is a full day preschool situated within the Business Park which was given planning permission recently to expand to accommodate 32 no. children (SD20A/0021). A residential zoning objective on this site would benefit the continued use of this important social infrastructure.

## **8 Conclusion**

It is submitted that the proposal is consistent with the objectives of the NPF, RSES and Draft South Dublin County Development Plan 2022-2028 to deliver anticipated and targeted population growth through compact growth, higher densities and revitalising under-utilised brownfield/infill lands within the urban footprint of urban areas and local centres.

The site is located c.1.5 km from Clondalkin village centre and adjacent an established residential neighbourhood and Corkagh Park which provides high quality residential amenity. The existing business park is not a large employment generator with transient businesses such as auto sales and servicing.

The population growth in this area has stagnated as there are no developable sites available due to the semi-detached housing estate typology which dominates the area and by the large areas of amenity green spaces within the immediate surrounding area.

A rezoning of these lands to RES-N residential, would allow the development of new residential dwellings on a highly accessible and serviced brownfield site and would form a natural extension to the adjacent residential neighbourhood. Furthermore, the rezoning of these lands would also lend itself to resolving some of the issues raised Ms. Louise Stynes O'Connor re-zoning submission on the adjacent lands (Ref. SD-C195-26) which also seeks to re-zone parts of the existing 'EE' zoning designation.

**Manahan Planners**

**September 2021**