

Project No. 39.04/2021



SUBMISSION TO DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

DATE: September 2021

on behalf of:
John Gargan and
Frank Gargan

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1.0 Introduction

In accordance with Section 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), RW Nowlan & Associates, 37 Lower Baggot Street, Dublin 2, wish to make this submission to the “Draft South Dublin County Development Plan 2022-2028” to South Dublin County Council on behalf of John Gargan and Frank Gargan, Rathcreedan, Rathcoole, Co. Dublin. This written submission is being made in response to an invitation for comments from interested parties by South Dublin County Council, and is submitted within the specified timeframe for submissions (15th September 2021) as detailed within the Draft South Dublin County Development Plan 2022 – 2028 prepared by the Planning Authority.

This submission specifically relates to the Newcastle Area of South Dublin and the future strengthening and consolidation of service provision for the existing population. Over recent years, Newcastle has shown strong population growth with the provision of new residential properties in the area. It is considered that current service provision for the local population has not developed to meet growing demands of the population. Our submission as outlined below represents a proposal which is underpinned by the principles of sustainable development.

2.0 Description of the Subject Lands

The subject site to which this submission relates comprises undeveloped land that is located adjacent to established residential development in the north of Newcastle, Co. Dublin. The site is bound by the Peamount Road to the east, lands zoned as ‘Objective RU’ to the north and west and established residential dwellings to the south.

The lands are relatively flat and there are no restrictions on the future development of the lands for development. See the Figure 1 below for the extent of the subject site. The subject site has been zoned ‘Objective RU’ in the Draft Development Plan.



Figure 1: Subject Site Location in Newcastle

There are no previous planning applications relating to this site. A pedestrian path runs the length of the subject site on the eastern boundary and access to the site is available from the Peamount Road.

This proposal sets out considerations for the rezoning of the subject lands to accommodate comparison shopping facilities which would support the growing population of Newcastle. The subject site is zoned 'Objective RU' in the Draft Development Plan but it is considered that a zoning designation of 'VC' would be more appropriate for this location.

3.0 Strategic Context – National Planning Framework

The National Planning Framework (NPF) came into effect in May 2018. The NPF set out policy objectives for future growth throughout Ireland. Policies objectives to note include;

National Policy Objective 1c – Eastern and Midland Region: around 320,000 additional people in employment, i.e. 1.34 million in total.

National Policy Objective 2a – A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.

National Policy Objective 6 – 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.

4.0 Strategic Context - Regional Spatial and Economic Strategy

The Regional, Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly provides key policy and development strategies for the Eastern and Midlands Region.

The RSES describes Dublin City and Suburbs as an *‘International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment’*.

A Metropolitan Area Strategic Plan (MASP) for Dublin has been prepared as part of the RSES for the Eastern and Midlands Region. It provides a 12-year strategic planning and investment framework for the Dublin metropolitan area.

Key policies within the MASP include;

- Increased employment density in the right places – To plan for increased employment densities within Dublin City and suburbs and at other sustainable locations near high quality public transport nodes, near third level institutes and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring and existing built-up areas.
- Co-ordination and active land management – To enhance co-ordination across local authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands.

5.0 Strategic Context – Newcastle Local Area Plan

It is anticipated that a new Newcastle Local Area Plan will be prepared following the adoption of the new South Dublin County Development Plan 2022-2028. The current plan has been extended and is due to expire in December 2022.

As such, the current plan will not be discussed at length in this submission but the vision for Newcastle as outlined in the current Local Area Plan provides an appropriate overview of the challenges and opportunities development in Newcastle can provide. The stated vision is as follows:

“A village with a strong sense of identity that offers a good quality of life building upon its past, where there is integration between existing and new developments through the creation of an intricate network of walkable streets that connect pedestrian and cyclist paths with important destinations; a beautiful village with quality useful spaces that realise and enhance the full potential of Newcastle’s rich natural and built heritage through the sensitive and considered incorporation of hedgerows, waterfeatures, burgage plots, townland and parish boundaries, archaeology, protected structures and recorded monuments; a developing village that sensitively addresses the contrast between existing and new elements and retains much of its existing

character, whilst being a showcase for the sensitive expansion of an historic and nationally important settlement”.

6.0 Strategic Context – Draft South Dublin County Development Plan 2022-2028

The subject lands are zoned as ‘Objective RU’ in the Draft South Dublin County Development Plan 2022-2028. The subject site adjoins the current zoning boundary in Newcastle (Figure 2 and Figure 3). Within the draft development plan maps, the Newcastle area is split between Map 3 and Map 7 as shown in Figure 2 and Figure 3 below.

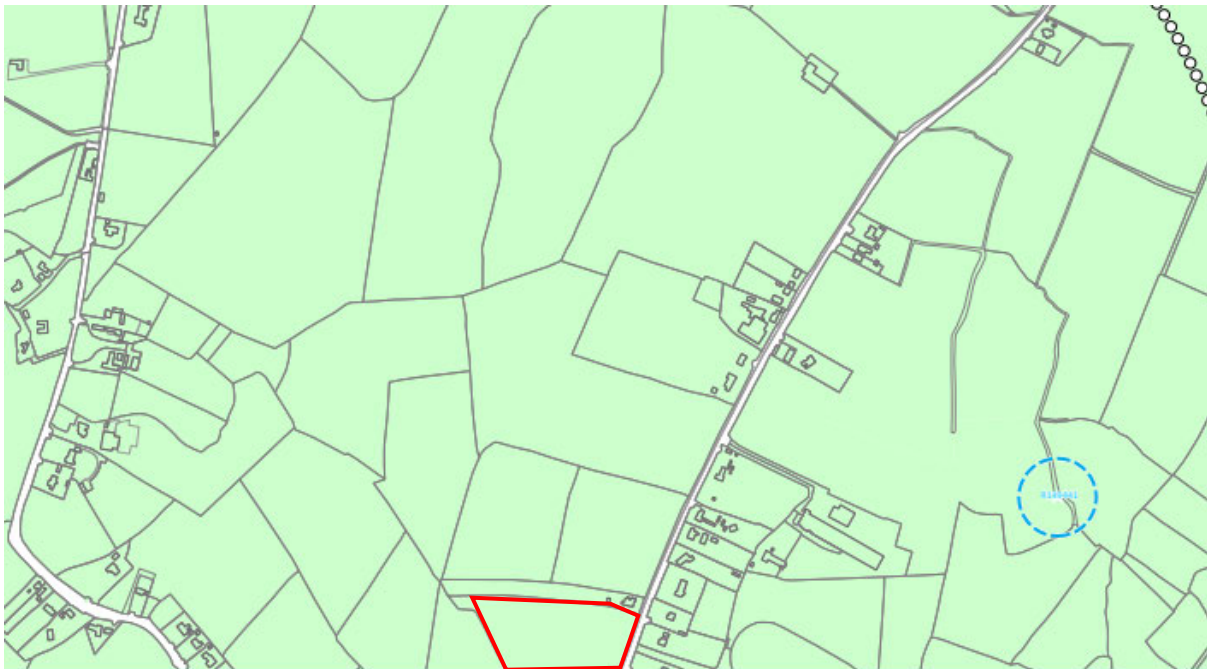


Figure 2: Extract from Zoning Map 3 within the Draft South Dublin County Development Plan 2022-2028

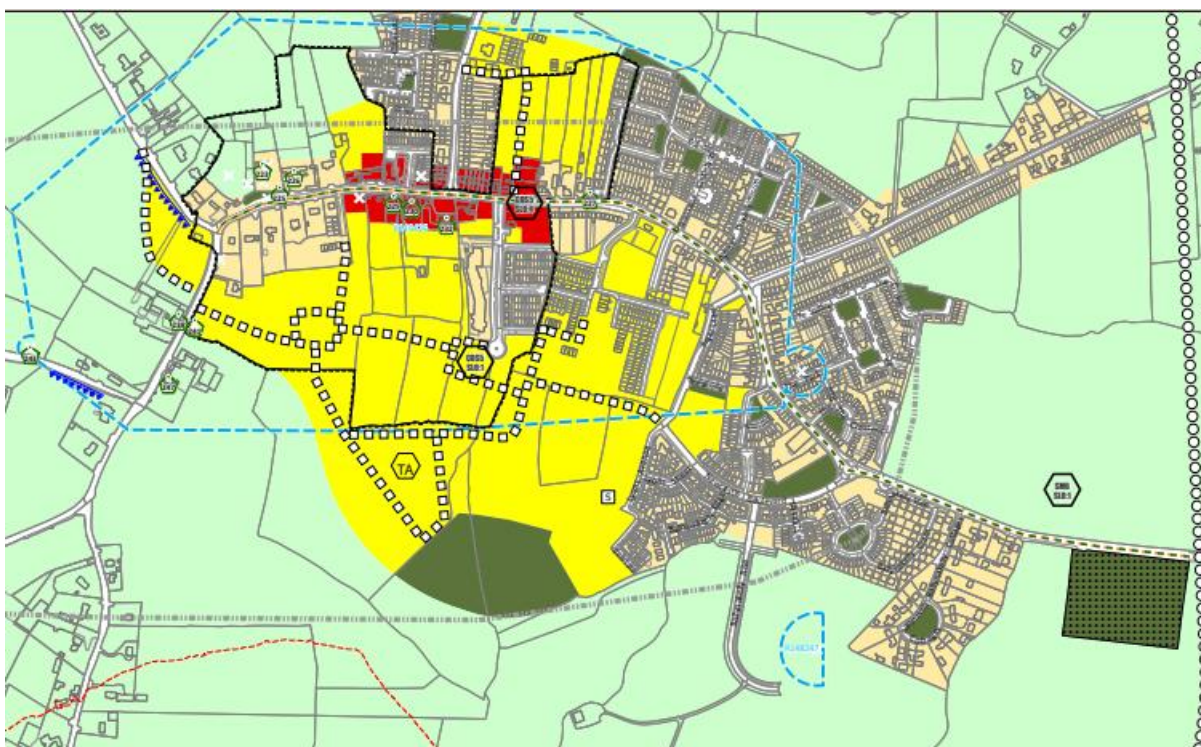


Figure 3: Extract from Zoning Map 7 within the Draft South Dublin County Development Plan 2022-2028

Newcastle is described within the Draft Plan as follows: *‘the settlements of Newcastle and Rathcoole are identified as ‘Self-Sustaining Growth Towns’, falling within the category of medium sized towns. It is important that both these areas develop at an incremental pace, based on the delivery of social, physical and transport infrastructure and services’*. Newcastle has shown strong growth since the adoption of the previous development plan and which looks set to continue with a high level of new residential development throughout the area.

Within the Draft Development Plan it is acknowledged that *‘the population of Newcastle has grown by 188.2% over a ten-year period (2006 - 2016). This level of growth far exceeds the South Dublin average for the same period (12.89%) and EMRA (15%). Based on existing situation of; sites under construction and a small quantum of extant permission not commenced, residential growth is anticipated to grow to 4,916 persons (+48% growth on 2016 figures or +203% over ten years)’*. This represents an immense growth to the population of Newcastle over a relatively short

period of time. This population requires a significant increase in service provision in the local area to support the community long-term.

The challenges in balancing the needs of the local population with the protection of the historic importance of Newcastle are recognised within the Draft Plan. The main issues involved are set out including challenges relating to *‘main streets of local villages are often thoroughfares where motorised vehicles are dominating the streetscape’*. The new Development Plan should take account of opportunities in other locations within the area to provide necessary car based service provision while protecting the historic village core of Newcastle.

Newcastle is currently designated in the Retail Hierarchy as Level 4 in the development plan. Level 4 areas usually contain one supermarket to facilitate needs of the local population.

Level 4	Newcastle Village, Rathcoole Village, Saggart Village, Palmerstown Village, Rowlagh Village*, Templeogue Village, Lucan Village, Rathfarnham Village, Knocklyon Shopping Centre, Firhouse Shopping Centre, Palmerstown Shopping Centre and all Local Centres in the County.	Neighbourhood Centres, Local Centres- Small Towns and Villages These centres usually contain one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population. These centres meet the local day-to day needs of surrounding residents.
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Figure 4: Current Development Plan Retail Hierarchy

At present, it is clear that Newcastle is lacking the retail offering necessary to meet local needs of an ever-growing population. Newcastle population has expanded greatly over the past 10 years since the adoption of the previous development plan and as such has shown clear capacity for an increase in retail service to support and promote sustainable communities in the area.

7.0 Proposed Zoning Objective

The site that is subject of this submission has been zoned 'Objective RU' in the Draft Development Plan notwithstanding its location directly adjacent to residential development to the south and the logical next piece of land zoned to support the strong growth of Newcastle. The subject site also adjoins the current zoning boundary in Newcastle (Figure 2 and Figure 3 above). Zoning of this site for development purposes would therefore represent a natural extension of the zoning boundary. This extension would provide an opportunity for the provision of much needed services in the Newcastle area.

It is considered that a more appropriate zoning objective could be: 'VC': 'To protect, improve and provide for the future development of Village Centres'. Within this zoning objective, a 'Shop-Neighbourhood' use is permitted in principle and could be provided to support the needs of a growing local population. Additionally, the rezoning of the subject lands would support compact growth policies within the Draft Development Plan as well as the 'sequential principle' for zoning and future development.

As illustrated above, Newcastle is growing at an incredible pace, 188% between 2006 and 2016. This high population growth can be attributed to large scale housing development in the area between 2006 and 2016. It is considered that this rapidly increasing population trend will continue in the next census as Newcastle has continued to show strong growth from 2016 to date.

Currently, there is a concerning lack of retail services in the Newcastle area to support the growing population. The closest available supermarket services for residents of Newcastle is located 4.6km away from the village. It is vital that residents have appropriate comparison shopping opportunities in the area rather than travelling considerable distances to the closest alternative services (Table 1).

Name	Location	Distance	Travel Time (Car)
Tesco Express	Mainstreet, Rathcoole, Co. Dublin	4.6 km	8 minutes
Dunnes Stores	Moneyatta Commons, Saggart, Co. Dublin	5.7 km	9 minutes
Aldi	Maynooth Road, Celbridge, Co. Kildare	7.3 km	10 minutes
Supervalu	Newcastle Road, Lucan, Co. Dublin	7.4 km	12 minutes
Lidl	Fortunestown Lane, Cooldown Commons, Dublin	8.6 km	12 minutes

Table 1: Distance from Newcastle to Closest Store of Five Major Supermarket Retailers

It is considered that Newcastle now has a population density necessitating appropriate comparison shopping opportunities be provided within the town rather than residents having to travel to other areas to avail of their preferred supermarket services. It is critical that the new South Dublin County Development Plan has regard to this when finalising appropriate zoning designations throughout Newcastle. As highlighted above, within the current Development Plan, Newcastle is designated as level 4 on the retail hierarchy for the County. At present, there is a clear under-provision of vital services to meet local needs through the lack of appropriate comparison supermarket facilities closer than 4.6 km from the area.

Within the draft development plan text, it is set out that *'Newcastle contains landmark medieval structures, a relict field system morphology and a built form that underscores the historical significance of the area'* (Figure 5). As such, it is considered that sites within the village core of Newcastle would be less suitable than the subject lands to facilitate a comparison shopping facility as it would drive car based travel and disrupt the historic core of Newcastle Village. Additionally, as outlined above, it is acknowledged within the development plan that currently, a major issue within local villages is that they act as a thoroughfare where motorised vehicles dominate the

streetscape. It is considered that another comparison retail outlet in the village centre would only exacerbate this issue as most people travel to these services by car.



Figure 5: Historic Significance of Newcastle Village

Our client is in ownership of the site outlined in figure 1 above which we consider to be an ideal location to provide convenience shopping services to the Newcastle area.

The subject site could provide all essential features of a medium to large-scale convenience retail development which would not be beneficial on small scale sites closer to the centre of Newcastle town. The nature of this type of retail offering necessitates large car park area provision as many customers to this type of service will need to travel by car. The subject site is approximately 2.524 hectares, providing ample room to provide a quality retail store, car parking and any other miscellaneous service provision common at such locations e.g. glass bottle recycling centre, self service laundry facilities etc.

8.0 Conclusion

The town of Newcastle in South Dublin is considered to be underserved at present in terms of retail services necessary due to recent population growth and residential development expansion seen within the lifetime of the previous South Dublin County Development Plan.

New residential development on the subject site provides an opportunity to deliver the objectives in national and regional policy documents to rejuvenate towns and villages and increase employment opportunities closer to where employees are living.

Our client proposes to improve the overall service provision to the local population if appropriate zoning is achieved on their site which is considered a prime location for a convenience retail development. Zoning of the subject site would represent a natural extension to the zoning boundary in response to the recent growth and expansion seen throughout Newcastle and would support policies relating to compact growth, sequential development and reduction of car based traffic utilising the village core as a thoroughfare.

We respectfully request that the proposed change of zoning designation of the subject lands from 'Objective RU' to 'Objective VR' is considered. The subject land provide great potential to contribute to achieving an improved service provision and the overall future sustainability within Newcastle village.

Yours Sincerely,

A black rectangular box redacting the signature of the person representing R.W. Nowlan & Associates.

R.W. Nowlan & Associates