

Project No. 39.04/2021



SUBMISSION TO

DRAFT SOUTH DUBLIN

COUNTY DEVELOPMENT PLAN

2022-2028

RE: Newcastle/Rathcoole

DATE: September 2021

on behalf of: John Gargan and
Frank Gargan

TABLE OF CONTENTS

1.0 INTRODUCTION..... 3

2.0 DESCRIPTION OF SUBJECT LANDS.....3

3.0 STRATEGIC CONTEXT – NATIONAL PLANNING FRAMEWORK..... 4

4.0 STRATEGIC CONTEXT – REGIONAL SPATIAL AND ECONOMIC STRATEGY..... 5

5.0 STRATEGIC CONTEXT – NEWCASTLE LOCAL AREA PLAN..... 6

6.0 STRATEGIC CONTEXT – DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028..... 6

7.0 PLANNING SUBMISSION..... 9

8.0 CONCLUSION..... 12

List of Figures

Figure 1: Location of Subject Lands..... 4

Figure 2: Extract from Zoning Map 7 in Draft South Dublin County Development Plan 2022-202..... 7

Figure 3: EE Use Class Zoning Extract from Draft South Dublin County Development Plan..... 9

Figure 4: Proposed New Location of Existing Green Recycling Facility..... 11

1.0 Introduction

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 and Rathcoole Areas of South Dublin and the future expansion of zoned lands to support and consolidate the consistent growth in the area. Our submission as outlined below represents a proposal which is underpinned by the principles of sustainable development.

2.0 Description of Subject Lands

The subject lands consist of approximately 216 acres located to the south of Newcastle town and north of Rathcoole in South County Dublin. The site is strategically located on the N7, approximately 15km to the south-west of the Dublin City Centre and largely comprises greenfield lands in agricultural use. Access to the landholding is via Tay Lane to the east of the site.



Figure 1: Location of Subject Lands

Currently the lands have a zoning designation as 'RU' with an objective "To protect and improve rural amenity and to provide for the development of agriculture'. The Greenogue Business Park and Baldonnell Business Park are located in close proximity to the north-east of the subject lands. Lands to the east on the other side of Tay Lane are zoned 'EE' which has an objective 'To provide for enterprise and employment related uses'

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

The Newcastle Local Area Plan was adopted by Elected Representatives in South Dublin County Council in November 2012 and came into operation in December 2012. On the 23rd October 2017, by resolution, the Local Area Plan was extended for further period (in accordance with Section 19 of the Planning and Development Act 2000, as amended). The Local Area Plan is now due to expire in December 2022. While it is anticipated that a new Local Area Plan will be prepared following the adoption of the County Development Plan, the policies contained within the Local Area Plan are still relevant when considering the future of Newcastle.

The Local Area Plan highlights that there has been extensive residential and employment development in Newcastle in recent years which has transformed the area from a rural village to a developing village with suburban characteristics. It is our view that the new development plan should take in to account the evolving nature of Newcastle and consider future demands that will likely come to the forefront over the lifetime of the new plan.

The Local Area Plan also highlights a strength of Newcastle is the potential for ‘further employment opportunities from Greenogue and Baldonnell’. It is considered that the two industrial parks mentioned are reaching capacity in terms of potential to expand to appropriately zoned lands and as such other lands should be considered to accommodate future expansion.

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

Within the Draft Development Plan maps, the subject lands are depicted on Map 7 as shown in Figure 2 below.

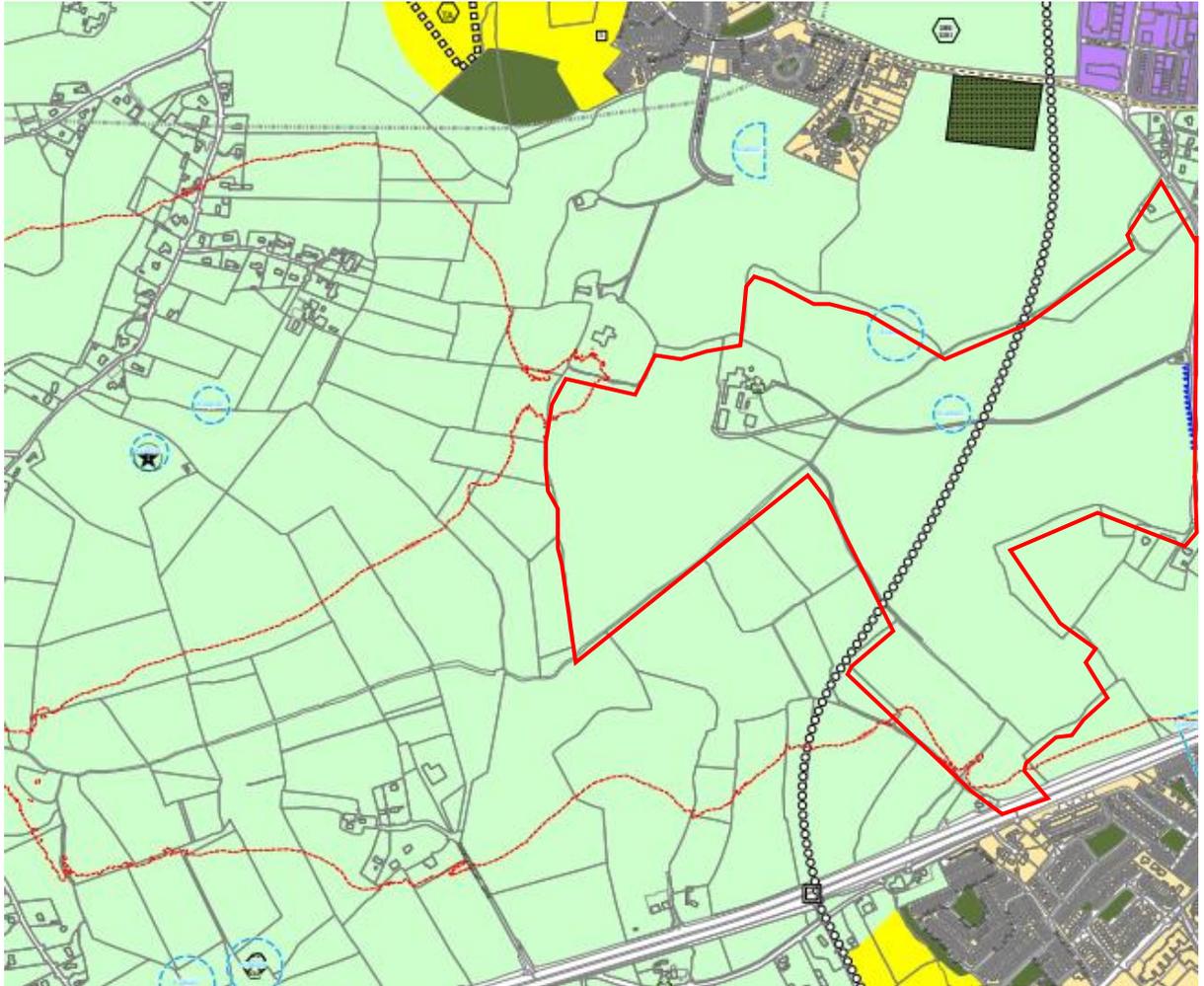


Figure 2: Extract from Zoning Map 7 in Draft South Dublin County Development Plan 2022-2028.

Uses which are permitted in principle in lands zoned 'EE' as shown in figure 4 below.

Table 13.10: Zoning Objective 'EE': 'To provide for enterprise and employment related uses'

Use Classes Related to Zoning Objective	
Permitted in Principle	Abattoir, Advertisements and Advertising Structures, Boarding Kennels, Enterprise Centre, Fuel Depot, Heavy Vehicle Park, Home Based Economic Activities, Industry-General, Industry-Light, Industry-Special, Office-Based Industry, Office less than 100 sq.m, Open Space, Petrol Station, Public Services, Recycling Facility, Refuse Transfer Station, Science and Technology Based Enterprises, Scrap Yard, Service Garage, Shop-Local, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.
Open for Consideration	Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, Data Centre, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.
Not Permitted	Aerodrome/Airfield, Bed & Breakfast, Betting Office, Camp Site, Caravan Park-Residential, Cemetery, Community Centre, Conference Centre, Crematorium, Cultural Use, Doctor/Dentist, Education, Embassy, Funeral Home, Guest House, Health Centre, Hospital, Housing for Older People, Live-Work Units, Nursing Home, Off-Licence, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Recreational Facility, Residential, Residential Institution, Retirement Home, Rural Industry-Food, Shop-Major Sales Outlet, Shop-Neighbourhood, Wind Farm, Work-Live Units.

Figure 3: EE Use Class Zoning Extract from Current SDCC Development Plan

It is submitted that an extension of the 'EE' zoning designation from the east to the subject lands could facilitate future expansion of employment areas beyond Greenogue Business Park and Baldonnell Business Park to support future demands for appropriately zoned lands to provide employment services in this location.

The Newcastle area has changed dramatically since the adoption of the previous Development Plan and this new Development Plan must carefully consider the future demands and overall potential of the Newcastle and Rathcoole areas in terms of sustainable employment opportunities close to where people are living.

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)'*. In order to sustain this rapidly growing population, employment opportunities are required in the vicinity to reduce commuter car based travel patterns.

The Draft Development Plan elaborates further that *'in terms of employment, the ratio of residents to jobs within the settlement is 0.21 indicating a commuter-based settlement. Notwithstanding this figure, the settlement has nearby economic assets which provide key services to the County and wider Dublin Region. Greenogue Business Park, located east of Newcastle less than 1km from the core area, is contiguous to the settlement boundary and in 2016 accommodated an estimated 2,940 jobs'*. This confirms that the local population in Newcastle are generally commuting outside of the local area for employment.

As shown in Figure 2 above, provision has been made for a long-term road project (white dotted line). This proposed road development will cut directly through our clients lands. It is considered optimal to zone the lands around this proposed road to support long term development which will support the Newcastle and Rathcoole settlements.

5.0 Planning Submission

This planning submission relates to future employment opportunities for Newcastle, Co. Dublin.

It is considered that the subject lands represent the optimal location for a natural extension of the South County Dublin's Zoning Objective 'EE' land bank. The site is strategically positioned between the settlements of Rathcoole and Newcastle and is located adjacent to existing Objective 'EE'

zoned land. In addition, it benefits from excellent connectivity to high quality road infrastructure (i.e. N7) which allows for proximate access to the M50 and Dublin City.

The subject lands represent an appropriate location to provide long-term employment opportunities for the local population and within South Dublin County. However, at present the subject lands are zoned as 'RU' lands seeking to protect and enhance rural amenity. It is considered that this is an underutilisation of strategically located lands given their strategic location between Newcastle and Rathcoole with very strong transport links to Dublin City Centre and the wider Country. It is proposed that the subject lands would be better utilised as 'EE' zoned lands to facilitate development of greater employment opportunities during the 2022-2028 period.

As illustrated above, Newcastle is growing at an incredible pace, 188% between 2006 and 2016. With Rathcoole showing similarly high levels of growth over the same period, the Drafting of the new Development Plan provides a timely opportunity to put in place structures to support this growth and sustainability policies to increase the number of local residents working close to home and effectively reduce car based travel through appropriate zoning policies. Both the Newcastle and Rathcoole areas have experienced a sustained period of growth and expansion over the lifetime of the previous South Dublin County Development Plan. It is considered that a rapidly increasing population trend will continue in the next census as Newcastle and Rathcoole have continued to show strong growth from 2016 to date.

The Draft Development Plan text also confirms that the ratio of residents to jobs in Newcastle is currently 0.21 meaning the population is largely commuting to employment outside of the local area. It is our opinion that through appropriate zoning, this could be significantly improved through the provision of a greater range of employment services closer to Newcastle and Rathcoole to support policies for sustainable travel patterns.

Our clients also own lands to the east of Tay Lane which are currently in use for a green recycling facility. The area highlighted yellow in Figure 4, approx. 4 acres, provides an ideal location to relocate the existing green recycling facility which is currently located to the east across Tay Lane. The site which currently holds the green recycling facility is being redeveloped and the recycling facility will need to be relocated. Our clients are committed to the continued operation of the green recycling facility as it provides a vital service for South Dublin County as well as the local area but this will require adequate lands to be rezoned to facilitate the relocation. It is considered that this service will become more and more important given how quickly the population is growing in Newcastle and Rathcreedan as well as South Dublin as a whole. The relocation of the recycling facility will also provide an opportunity for the service provision to be extended to include a bring centre etc.



Figure 4: Proposed New Location of Existing Green Recycling Facility

The proposed site (yellow) is buffered from nearby residential use and the existing Greenogue Equestrian facility by an area of existing mature trees. The site is accessed directly from Tay Lane. While it is considered that a larger proportion of the subject lands should be rezoned for 'EE' use within the South Dublin County Development Plan 2022-2028, the area identified in yellow, in particular, would ensure the continued operation of the Green Recycling service.

It is clear that further lands will be required to be zoned to support the growth and improvement of Newcastle town and village during the lifetime of the new Development Plan. Key to supporting this population growth will be provision of adequate lands to provide essential employment opportunities to local residents. It is our view that the subject lands outlined in this submission can facilitate future expansion in a plan led, sustainable manner.

Conclusion

Our client welcomes the opportunity to work with the Local Authority to fulfil the full potential of the subject lands through appropriate zoning in the South Dublin County Development Plan 2022-2028.

The subject lands provide an opportunity to consolidate and expand on the success of the surrounding Business Parks in providing high quality employment opportunities in the area. It is considered that extending the zoning objective 'EE' to the lands identified in this submission would represent a natural expansion of zoned lands to facilitate future demand over the lifetime of the new Development Plan.

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

Yours Sincerely,



R.W. Nowlan & Associates