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**Submission to Draft South Dublin County Development Plan  
2022 – 2028**

**For lands**

**At**

**Naas Road,  
Dublin 22**

**September 2021**



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**Introduction**

The following submission has been prepared on behalf of Colm Neville Construction UC landowner of lands located at Naas Road, Dublin 22, outlined in red on the OSI map extract exhibited below. A pre-draft submission was submitted in respect of these lands (Ref. SD-C147-154).

**Site Location and Context**

The lands comprise 3.23 Hectares (8 acres) located at Newlands between Newlands Cross and The Red Cow Roundabout approximately 4km southwest of Dublin City Centre.



**Site Location Map with Site Outlined in Red.**

The lands are situated between Monastery Road, Clondalkin, and the main N7 Naas-Dublin corridor. The Naas Road is a major entrance corridor to Dublin City Centre and Dublin’s South Urban Fringe. The strategic location is defined by proximity to Clondalkin Village, the M50 Red Cow interchange, a QBC (Quality Bus Corridor), proposed Metro lines and the high frequency LUAS Red Cow Station.

The lands have extensive frontage of c.150 metres along and access from the N7 slip road along the southern boundary. The lands are bounded to the north by Knockmeenagh Lane and the Round Towers GAA Club playing fields. Northeast of the subject lands, adjacent

to the GAA grounds are the SIAC Construction Headquarters and quarry at Monastery Road for which a 10 year permission for comprehensive redevelopment was granted in 2015 by ABP.



**Site Location Map with Subject Lands Outlined in Red and Lands to which SIAC Permission Applies Marked by Black Dot**



**Context Map**

The lands immediately east of the subject lands at St Brigid’s Cottages accommodate an existing residential development with the lands immediately west retaining an industrial estate occupied by motor trade uses. The wider context is generally comprised of older residential developments northwest of the GAA sports grounds at Floraville/Clondalkin and the Clondalkin Village Centre.



As part of the 2010 Newlands Overpass and N7 upgrade scheme, the slip road was maintained to provide access to adjacent commercial lands. In previous development plans there had been a specific local zoning objective (LZO 5) to promote a commercial corridor along the N7 entry to Dublin City. As early as 2010, discussions were held with SDCC in relation to the appropriate development of remaining undeveloped lands outside the M50 along the N7 corridor.

The more recent focus on Regen and the emphasis on the City Edge project means that the remaining undeveloped or derelict lands outside the M50 have fallen into a policy limbo condition.

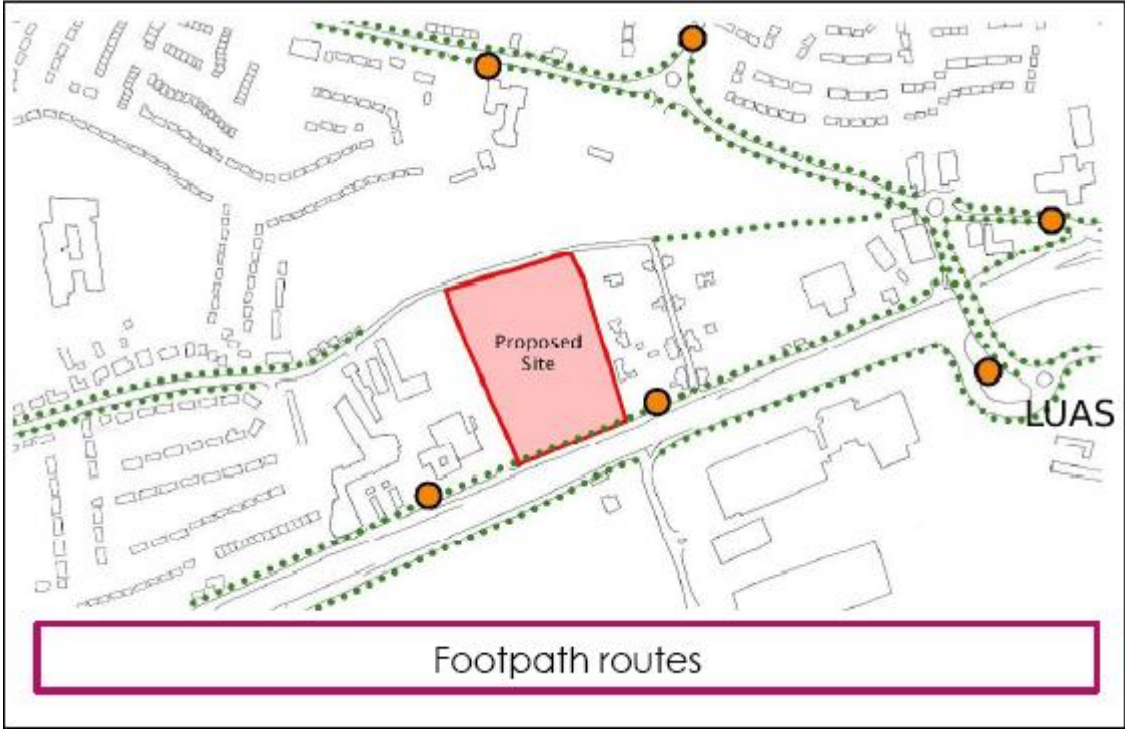


**City Edge Project Map Extract with Subject Lands Outlined in Red.**

While the subject lands are zoned EE, the main emphasis on EE zoning and future development is within the City Edge Area (c.75,000 jobs) and in the Baldonnell/Grangecastle areas, so the N7 EE edge is not seen as an important resource for industrial or commercial development – the LZO 5 vision has been lost and has not been replaced.

There is no policy context for major road corridor conditions in the draft Building Height and Density Guide prepared in conjunction with the draft SDCDP.

The image below shows this is an accessible location with pedestrian routes to bus stops (circles) and to the Red Cow multi-modal public transport interchange.



**Pedestrian Routes**





Google Aerial Image with 1km and 500m Radius from Luas shown

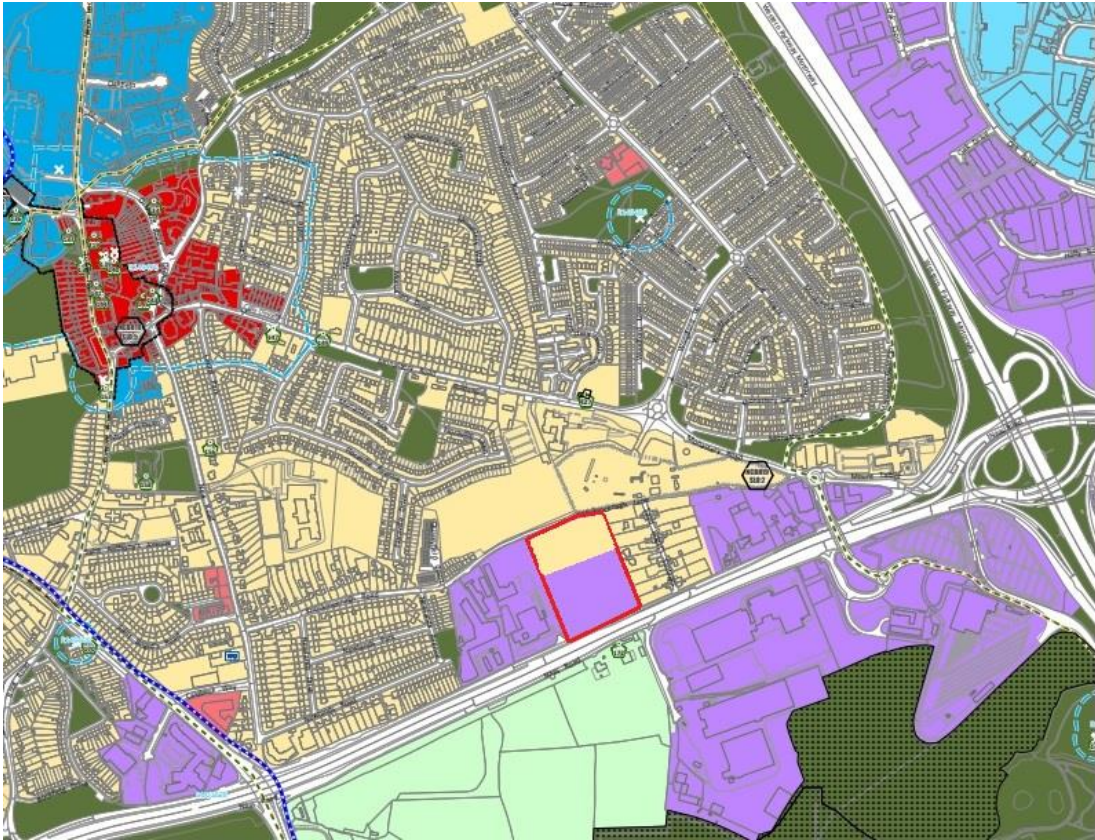
The site is located within the Dublin Metropolitan Area Strategic Plan described in the EMRA RSES, at a pivotal point where the arterial routes meet the M50 and the modal shift to public transport is facilitated at the Luas interchange and Park and Ride and mode transfer are accommodated. As shown in the images above, the site is within 1km of the Luas and footpaths provide direct access from the site to the Luas. The site is therefore not remote or detached from urban infrastructure.

### **Submission**

In the absence of specific proactive policy context, the edge condition on the N7 approach to Dublin City centre has disimproved over the past decade and a policy change is required to redress the situation. This is possibly best provided by a SLO. A commercial edge can be maintained with edge-scaled buildings appropriate to a major corridor and public transport node context, accessed from the N7 slip road. A SLO can ensure no rat-

run possibility from the N7 to Clondalkin across the site via Knockmeenagh Road, or vice versa from Clondalkin to the N7.

As shown on the extract from the zoning map below, the rear of the lands are surrounded by residential zoning, with the exception of the adjacent lands to the west, which remain zoned EE. The rear section of lands fronting Knockmeenagh Lane can be rezoned to RES for integration into the Clondalkin urban area, as illustrated on the image below.



**SDCDP Zoning Map with Site Outlined in Red and Proposed RES rezoning identified**

**Request**

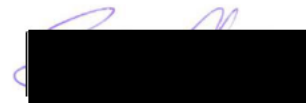
It is requested that the policy for development of the EE lands outside the defined City Edge Project area and along the N7 be strengthened to allow for the creation of an appropriate edge to a major corridor into Dublin City.

It is requested that the rear of the site, which fronts Knockmeenagh Lane, be rezoned to Objective RES. RES zoning on this section of the site will provide an appropriate edge to

Knockmeenagh Lane and a land use which is consistent with the existing surrounding developments.

It is requested that this submission be given full consideration in the preparation of the new South Dublin County Development Plan 2022-2028.

Yours sincerely,

A black rectangular redaction box covers the signature area. Above the box, there are faint, handwritten purple scribbles that appear to be the initials 'SC'.

Simon Clear.