

**Submission by Mr. Declan Claffey and Ms. Nora McCarthy-Claffey  
to  
South Dublin County Council in relation to  
Draft South Dublin County Development Plan 2022—2028**



Date of Submission 15 September 2021

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PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)  
PLANNING AND DEVELOPMENT REGULATIONS 2021 (AS AMENDED)

## 1. Introduction

We are the owners of a property with land consisting of approximately 12 acres (4.8 hectares) at the above address. This property and the land are outlined in Red on the attached site location map ([Appendix 1](#)). We request that part of this land “The subject land” be included within the Zoned Area of Rathcoole Town and Zoned for Residential Development (Use Zone Objective RES-N). The area we request to be rezoned is shown on [Appendix 2](#); this contains an area of approximately 7.5 acres (3 hectares).

## 2. The Local Environment

The Subject land is Located approximately 15km southwest from Dublin City Centre and 8km southwest from the M50. The N7 Naas Road runs east-west approximately 600m north of the Subject Site, with Junction 4 approximately 750 metres to the northeast. Rathcoole village centre lies 300 metres to the north east with Stoney Hill Road, in close proximity to subject lands western boundary, running from the west side of Rathcoole village southwest towards Killeel, with Co. Kildare approximately 4.5km to the southwest. Locally, the residential area of Green Lane Manor Avenue lies north of the proposed residential site, while open countryside lines to the south.

## 3. The Subject land

The lands to which this submission relates to “subject land” is located just south-west of the town of Rathcoole. Its northern boundary is adjacent to existing zoned and developed land at Green Lane Manor Avenue and an extensive area of playing pitches and amenity land. ([Appendix 3](#)). The Southern Boundary is an arbitrary line based on the Council's own proposal for the Rathcoole / Saggart Distributor Road. All services including foul sewerage, water and utilities are available in close proximity to the site. Access to the subject land is readily available from the existing housing scheme ([Appendix 4](#)) or by agreement with the landowners on the east and west sides. Rathcoole

is approximately a 5-6-minute (300 metres) walking distance from the subject land. Rathcoole village centre provides a range of services and facilities to support residential communities. This includes two primary schools, one secondary school, a hardware store, dry cleaners, butchers, pharmacy, take-aways, a range of restaurants and public houses, credit union, Bank of Ireland, bookmakers, hair and beauty services, a range of professional services, and other similar services typically found in town and village centres. The 69 Dublin bus service has stops located on Main Street and within 300m from the subject land.

#### 4. Relevant Planning Policies:

##### **Draft South Dublin County Development Plan 2022-2028**

###### **Core Strategy and Settlement Strategy (CS)**

CS10 Objective 1

CS10 Objective 3

###### **Policy H2: Supply of Housing**

H2 Objective 2

H2 Objective 6

###### **The National Planning Framework (NPF) 2040**

National Policy Objective 3a

National Policy Objective 33

National Policy Objective 34

National Policy Objective 35

###### **Housing for All | A New Housing Plan for Ireland**

Pathway to Increasing New Housing Supply

## 5. Proposed Zoning Objective in the South Dublin Development Plan

We proposed the re-zoning of our lands to Objective RES-N “*To provide for new residential communities in accordance with approved area plan uses*” The main considerations material to the assessment of this zoning objective have been summarised as follows:

- Sustainable use of existing and nearby services
- Existing agricultural use is no longer sustainably viable
- New objectives outlined in Housing for All | A New Housing Plan for Ireland
- The Rathcoole / Saggart Distributor Road.

### 5.1 Sustainable use of existing and nearby services

The servicing of land for new developments is an expensive undertaking that represents a considerable investment in the future development potential of the town. Public utilities and services including foul sewerage, water and electrical utilities are already available in close proximity to the subject land further to the recent development at the northern boundary known as Green Lane Manor Avenue ([Appendix 3](#)). Access to the subject land can be gained from this existing housing scheme ([Appendix 4](#)) or by agreement with the owner of the lands to the west of the boundary ([Appendix 5](#)).

In the interest of efficiency and sustainability, it is vitally important that these nearby and existing services are utilised to their full capacity prior to new investment being made in other areas which do not have facilities readily available. It should be noted that this land is not encumbered by environmental considerations, such as may exist in other local areas such as Rathcoole Woodlands and environs.

We propose rezoning the subject land to RES-N for the South Dublin County Development Plan 2022-2028 in order to efficiently utilise these nearby public utilities and services and to support the ever growing and substantial employment base in close proximity to Rathcoole from the industrial lands to the north at Greenogue, the Citywest Business Campus to the east and Baldonnell where the Amazon fulfilment centre is currently under construction and will create more than 500 permanent jobs once complete.

### 5.2 Existing agricultural use is no longer sustainable

As a strategic development framework, Ireland 2040 sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. The NPF emphasises the importance of development

within existing urban areas by making better use of *under-utilised* land, together with higher housing and job densities, better services by existing facilities and public transport. It is noted that Objective 3a of the NPF states that it is a national policy objective to: “deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements”. The subject land is a well located greenfield site close to the town centre of Rathcoole, a key suburban settlement in the Greater Dublin Area. The site adjoins existing residential development and is considered to be a sequentially appropriate site for an extension to the built-up area. The subject land is therefore compliant with the objectives of the NPF. The subject land has been used until now for agricultural purposes. However, the extent of the new development in the vicinity now threatens the viability of this existing use. The proposed continued zoning of the subject land for agricultural use will create a pocket of agricultural land surrounded by incompatible neighbouring uses. The proposed zoning of the subject land for agricultural use will be of no tangible benefit to the people of Rathcoole and goes against the policies and objectives outlined in the Draft South Dublin County Development Plan 2022-2028, the National Planning Framework and Housing for All as this land will be considered under-utilised. We note that traditional agricultural activity is required to successfully cultivate the subject land each year. The close proximity of the subject land to Green Lane Manor Avenue is causing nuisance problems for both ourselves and the residents of the adjoining properties from these agricultural practices. As such, The RU agricultural zoning is no longer appropriate to these lands and we respectfully request you to change the zoning to RES-N.

### 5.3 New objectives in Housing for All | A New Housing Plan for Ireland

The Core Strategy and Settlement Strategy (Pg.70) states that Rathcoole settlement had a population in 2016 of 4,351 which is targeted to grow by 2,058 persons (+47%) to 6,409 persons by 2028. This projected level of growth is based on current permissions available to commence within and adjoining the town. This figure will need reconsidering in light of the Irish Governments *Housing for All* objectives which outlines that there must be a substantial increase in the current number of houses to be built. To achieve this, South Dublin County Council may now need to revise its population projections cited in the Core Strategy and Settlement Strategy and increase the amount of land zoned in greenfield sites particularly those within the Rathcoole settlement if it aims to meet the Housing for All objectives to support home ownership, increase affordability, eradicate homelessness, increase social housing delivery, support social inclusion and increase new housing supply. The subject land is located on a greenfield site in an appropriate location adjoining the existing built-up area of a suburban growth town. We propose rezoning the subject land to RES-N in order ensure the appropriate use of an under-utilised section of land to deliver much needed, high quality and sustainable housing and which complies with the policies and objectives outlined in the Draft South Dublin County Development Plan 2022-2028, the National Planning Framework and Housing for All. The subject land has the potential to provide an

attractive, high quality and sustainable new residential neighbourhood that is appropriately integrated with the existing surrounding development and the natural environment.

#### 5.4 The Rathcoole / Saggart Distributor Road.

The subject land is identified and referred to in the proposed Rathcoole / Saggart Distributor Road plans ([Appendix 6](#)). This proposed road is also referenced in the Draft South Dublin County Development Plan 2022 – 2028 ([Appendix 7](#)). The Rathcoole / Saggart Distributor plans make the following reference to the subject land “*POSSIBLE FUTURE ACCESS TO ZONED LAND*” It is clear from this statement that that South Dublin County Council has identified the subject land as a strategic location that is suitable for future housing which in the long term will benefit from enhanced future access with the proposed new distributor road. Given the urgency of the housing crisis and the Government's commitments in the *Housing For All* plan it is now crucial to identify and appropriately zone this under-utilised land that is strategically located adjacent to an existing housing development near essential services, has multiple access points and is in close proximity to nearby existing and proposed transport links. It is possible to facilitate the development of housing on the subject land in advance of the proposed distributor road. Permissions have been sought in past re: ([SD07A/0942](#)) and most recently re: ([SD21A/0087](#)) for housing developments located in close proximity to this proposed road and as such have been designed and situated in a manner that conforms to the original plans included in South Dublin County Development Plan. It is noted that the location of the proposed Rathcoole / Saggart Distributor Road as shown in the draft plan appears to run through our home and we respectfully request that the original plans published for the Rathcoole / Saggart Distributor road ([Appendix 8](#)) remain unchanged and for the zoning of the subject lands be amended to RES-N to allow for housing development to occur north of the distributor road at the subject land ([Appendix 6](#)).



## 6. Conclusion

In conclusion we wish again to request the rezoning of the subject land from “Objective RU: *To protect and improve Rural Amenity and to provide for the development of Agriculture*” to RES-N. There is an inadequate supply of land for new housing in the area and this shortfall in suitable development land will be exacerbated if the objectives set out in *Housing for All* are to be met.

The subject land is ideally located on the outskirts of Rathcoole with instant access to the town and services. It would provide an alternative residential development for the town and would meet the objectives of the Draft South Dublin County Development Plan 2022-2028, the National Planning Framework and Housing for All.

In the interest of sustainability and the proper planning and development of the area, we would suggest that the subject land would be better zoned “Objective RES-N: *To provide for New Residential Communities in accordance with Approved Area Plans*”

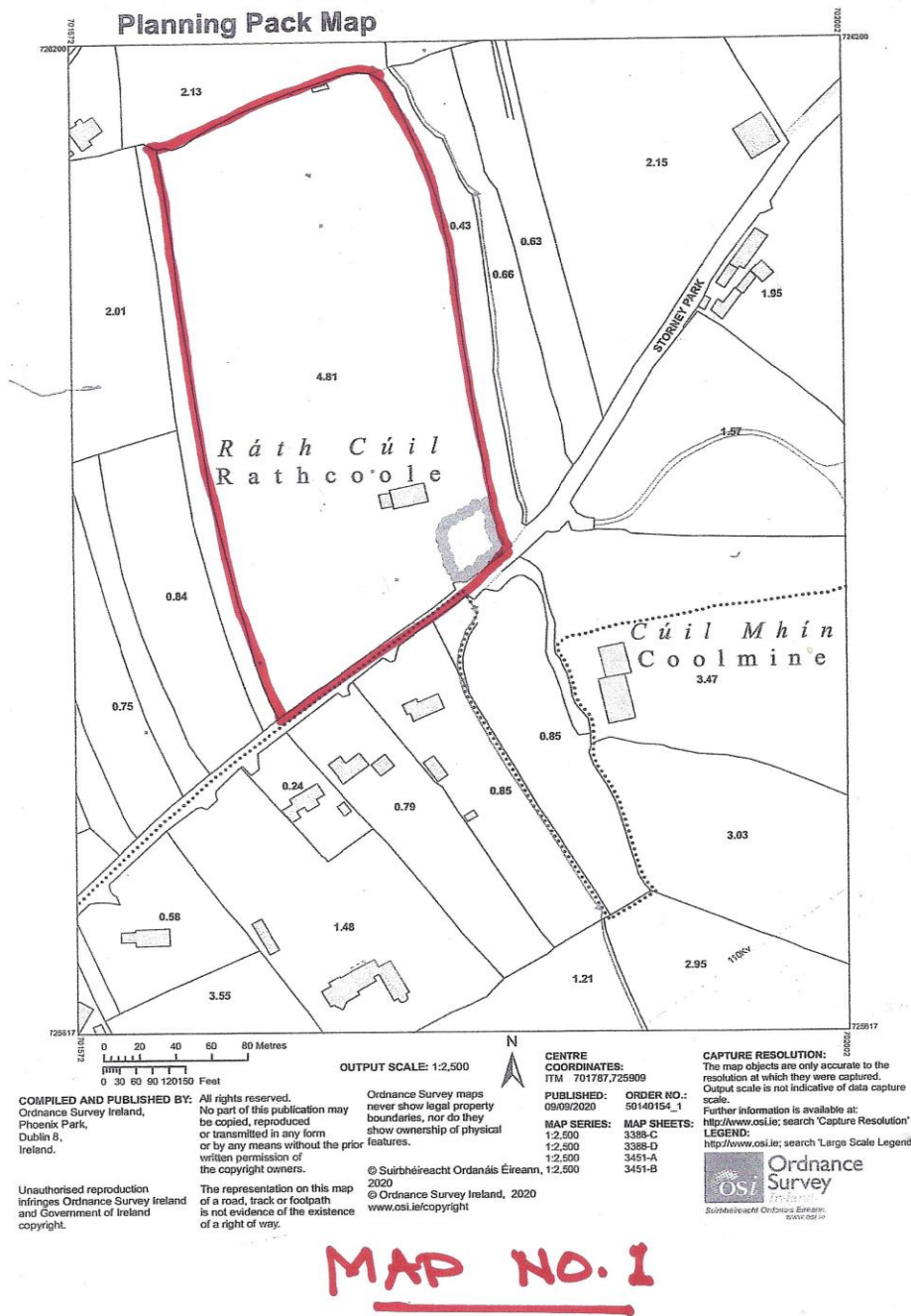
We trust that the Council will give due consideration to the foregoing and look forward to a favourable response.

Signed      Declan Claffey      Nora Claffey

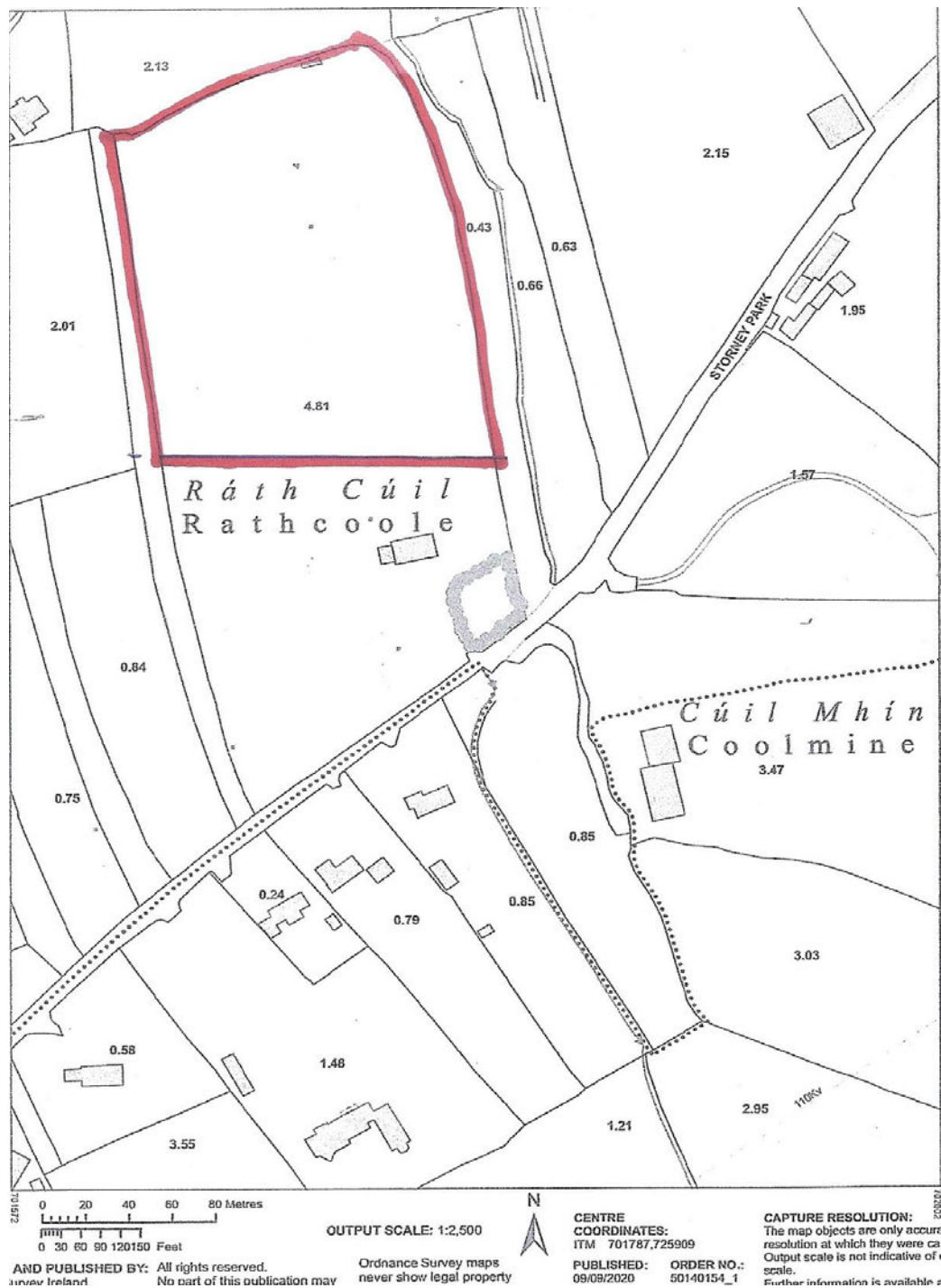


## Appendices

### Appendix 1



## Appendix 2



The "Subject Land"

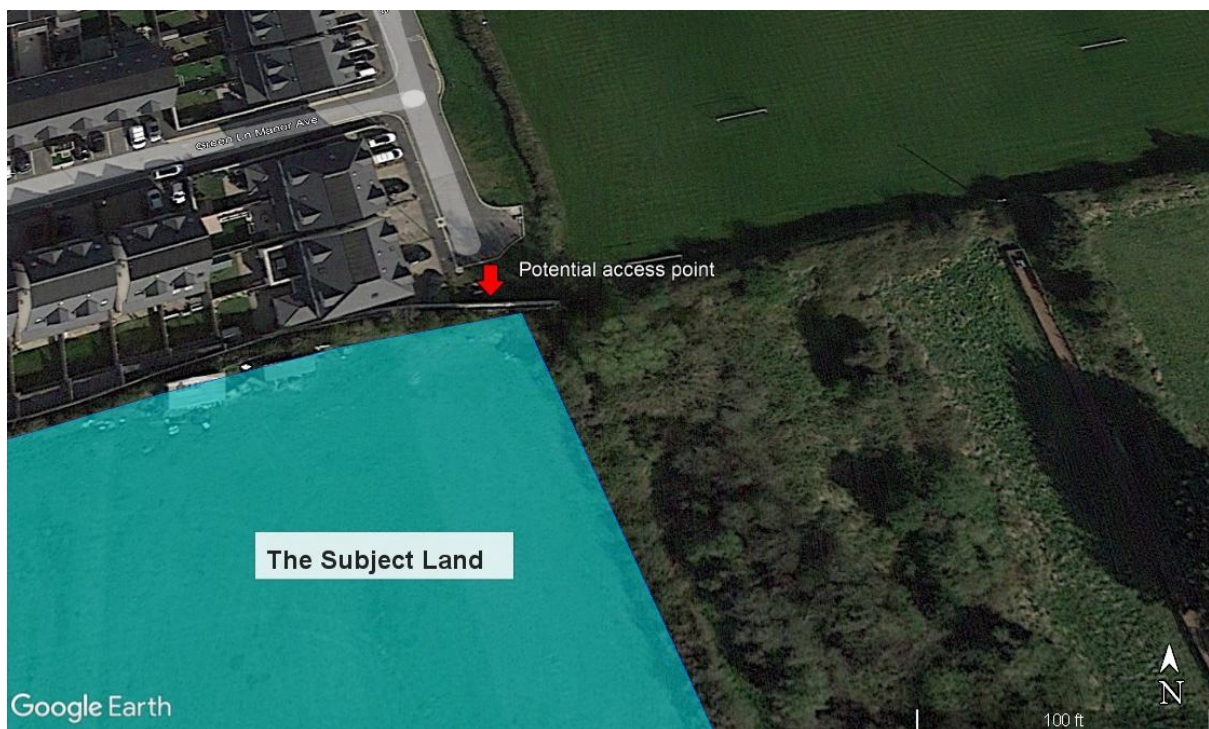


## Appendix 3



The Subject Land (located just below the distributor road)

## Appendix 4



Access point to the Subject Land from Green Lane Manor Avenue

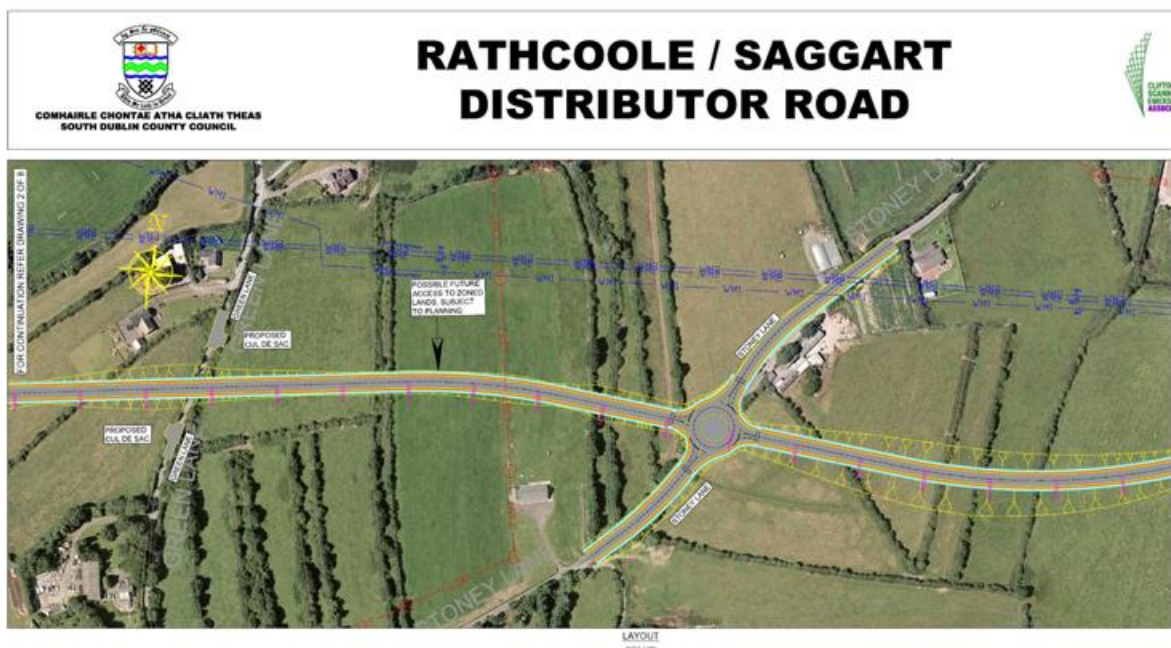


## Appendix 5



Access point to the Subject Land from Green Lane Road

## Appendix 6



Subject Land located north of Proposed Rathcoole Saggart Distributor Road

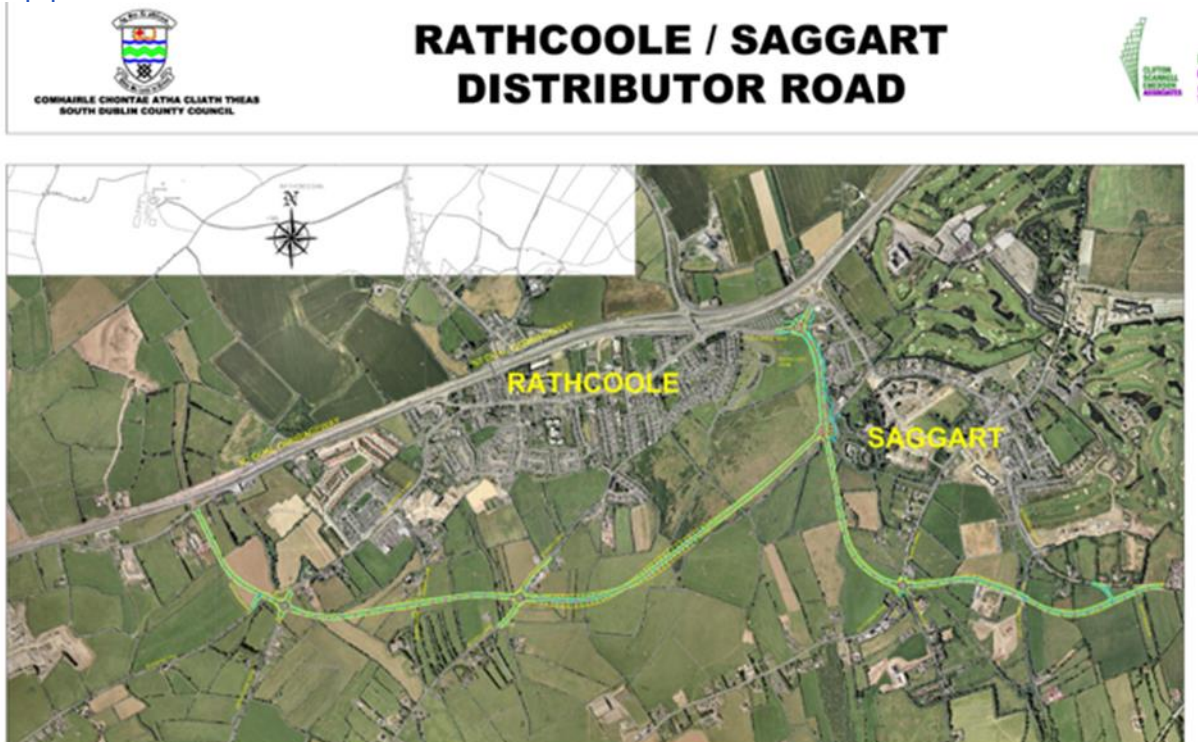
Proposed Rathcoole Saggart Distributor Road

## Appendix 7



Subject Land located north of Proposed Rathcoole Saggart Distributor Road 09  
sheet\_Map 08 Draft South Dublin County Development Plan 2022 - 2028

## Appendix 8



Submission by Mr and Mrs Claffey for lands at Stoney Hill Road, Rathcoole