

Re-zoning Submission for Newcastle, Co. Dublin
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SDCC Draft Development Plan 2022-2028

The submission requests the provision of a Green Belt on both sides of the R120 (Newcastle to Rathcoole Road) and between the existing built form covered by the Newcastle Local Area Plan and the lands to the east subject to Use Zoning Objective "EE" – *'To provide for enterprise and employment related use'*. The lands are currently subject to Use Zoning Objective "RU" – *'To protect and improve rural amenity and to provide for the development of agriculture'* and this submission requests that part of these rural lands be rezoned to Use Zoning Objective "GB" – *'To preserve a Green Belt between developing areas'*, for the reasons set out hereunder.

Newcastle was once a small rural village and under the Draft Development Plan (DDP) it is now designated as a Self-Sustaining Growth Town. Newcastle had a population of 3,093 persons under the 2016 Census and has a projected population of 5,039 in 2028. To the east, lies Rathcoole also a Self-Sustaining Growth Town with a population of 4,351 under the 2016 Census and a protected population of 6,409 in 2028. In between the two Self-sustaining Growth Towns, lies Greenogue and Aerodrome Business Parks. Newcastle is subject to ongoing house construction within the boundary of the Newcastle Local Area Plan. The Draft Development Plan (DDP) envisages that both Newcastle and Rathcoole will be subject to ongoing expansion up to at least 2028.

Both Newcastle and Rathcoole presently retain their own identity and it is in this regard that the provision of a Green Belt be provided so that each town retains its own identity into the future. The provision of the Green Belts will prevent both towns emerging into one. These former villages are rich in biodiversity, protected structures, and recorded monuments and are now under threat from excessive housing and industrial developments with the result that the villages are losing their character. In addition, the surrounding rural countryside is constantly under strong influence for the provision of one-off rural housing.

Green Belts protect the amenity value of the countryside and add to the landscape character of the area by preventing urban sprawl of large built-up areas. The Green Belts provide amenity and recreational opportunities to the village dwellers as well as maintaining lands in agricultural use. Green Belts also assist the ecological health of the area by virtue of being a storehouse for carbon dioxide, thus offsetting climate change. People in setting down roots in these developing towns will be encouraged by the designation of green belts in perpetuity and that they will be free of mounting planning objections to proposed development on these lands.

Because Newcastle Village is located with the rural hinterland it needs to be protected around its edges to soften the transition with the built environment. Accordingly, this submission seeks the provision of a green belts between the N7 and the Greenogue and Aerodrome Business Parks and between the Greenogue and Aerodrome Business Parks and Newcastle Village, itself defined by the boundary of the Newcastle LAP. The provision of the Green Belts will encourage development into zoned lands and brownfield underutilised lands with properly defined town boundaries. In this instance, the provision of the Green Belts will maintain and preserve the views of Athgoe Hills, Lyons Hill and the Dublin Mountains.

Whereas, presently, there is rural zoned lands between the above built-up areas, it is evident that these lands are subject to urban influence as set out hereunder and therefore the provision of the Green Belts would lessen such influence, i.e.

- 1 Seeking of planning permission for an Aparthotel on rural land and
- 2 Seeking of rezoning from rural land to residential land.

1 Aparthotel.

Permission was sought and refused for the erection of a proposed 156 bedroom part two to part four storey Aparthotel (Reg. Ref. No. SD18A/0401 & ABP-303665-19) on a site located between Ballynakelly Cottages and Newcastle Cemetery.

2 Rezoning.

It is understood that a Property Developer supported by the local St. Finians GAA Club will be making a submission to have 20 acres of rural lands rezoned for housing. In return for local support the said Property Developer will cede 10 acres to the GAA Club for playing facilities and clubhouse, together with a donation of €500,000 towards the Club's development costs. See newspaper article from The Echo, issue dated 3rd June 2021, attached to this submission.

The DDP clearly sets out that there is sufficient zoned lands within the County of South Dublin to serve the growing demand for housing up to 2028. The seeking of re-zoning of rural land to residential land is therefore contrary to Ministerial Guidelines, the National Planning Framework Roadmap, and the following provisions of the Draft Development Plan 2022-2028.

Chapter 2 Core Strategy and Settlement Strategy

Capacity of Undevelopment Lands within South Dublin.

Table 9 Capacity of Undeveloped lands within South Dublin, sets out that Newcastle is now a Self-Sustaining Growth Town and that the following residential capacity is available under the Draft Development Plan.

Greenfield Sites	Brownfield Sites
22.79 (HA)	1.42 (HA)
797 (Units)	50 (Units).

The capacity of undeveloped lands with the whole of the County is set out under **Chapter 2 Core Strategy and Settlement Strategy** and states:

Land Capacity and Zoning Requirements Excluding lands identified for strategic long-term development that will happen beyond the timescale of this Development Plan within SDZs, and major regeneration sites (allowable under Ministerial Circular, 2010), there is potential for 23,730 units on 477 hectares of developable land within the lifetime of the Development Plan period. The breakdown of the capacity per neighbourhood area and settlement and analysis of capacity against housing need is set out under Table 9 below.

Based on the housing capacity of existing undeveloped zoned land in South Dublin County, there is no requirement to zone additional land to serve the needs of population and housing targets set by the Ministerial Guidelines and the NPF Roadmap described under Sections: 2.3 (Statutory Context), 2.4 (Strategic Context - National, Regional and Ministerial Planning Policy), and 2.5 (Population and Housing Data) of this Chapter.

Newcastle - Self-Sustaining Growth Town

The growth in Newcastle is mainly focused on the adopted Local Area Plan. It is estimated that the remaining units in current permissions will, at an average of 80 units per year, take 7 years to develop. The remaining LAP lands which could accommodate 886 units do not have permission to date. The continued growth of Newcastle will be dependent on the delivery of the phasing and infrastructure required in the LAP.

The rezoning of rural land to residential land in Newcastle is also contrary to the following specific policies and objectives of the DDP.

Policy CS9: Newcastle

Support the sustainable long-term growth of Newcastle by focusing development growth within the current settlement boundary and based on the ability of local services to cater for sustainable growth levels.

CS9 Objective 1:

To ensure that development proposals provide for infrastructure including community buildings, sports pitches and service provision in line with population growth as set out in the Newcastle LAP (2012 extended to December 2022) or any succeeding plan.

CS9 Objective 2:

To support well designed infill and brownfield development on zoned lands along the main street, in particular where it provides for improved services, commercial, retail or mixed use provision to meet the needs of the growing population.

CS9 Objective 3:

To proactively support and promote the highest appropriate levels of services, social infrastructure, facilities, retail, open space amenity and economic activity to meet the needs of current and future growth in line with the scale and function of Newcastle within the settlement hierarchy.

The re-zoning of rural land to residential land in Newcastle is also premature pending the following:

- (i) Construction of the east-west Principal Linkage Road from the roundabout on the R120 east of the Village to the Athgoe Road and Hillcrest Road.
- (ii) Construction of the north-south linkage roads within the Village
- (iii) Construction of the Western Dublin Orbital Route, from the N81 to the Leixlip Interchange, which when constructed will divert traffic which currently passes through Main Street, Newcastle without stopping:
- (iv) Preparation and completion of a new Local Area Plan once the current LAP expires on 9th December 2022 and
- (v) Compliance with Policy and Objective set out under Paragraph 7.9 Transport Studies and Traffic Management of the Draft Development Plan.

Policy SM6: Traffic and Transport Management which states:

Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users

And

SM6 SLO 1:

To investigate the need to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement.

The above proposed re-zoning submission is supported by St. Finians GAA Club, with the promise that a site and financial support will become available to them if the re-zoning is successful. In this regard, it should be noted that under Paragraph 8.6 Sports Facilities and Centres of the Draft Development Plan, Policy COS4: Sports Facilities and Centres states:

Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable.

and

COS4 Objective 14 states:

To provide a sports and recreational amenity in Newcastle, incorporating a full-size GAA, multi-use, all-weather playing pitch, two basketball courts, tennis court, dressing rooms, a walking/jogging/cycling track as well as parking areas and related additional open space.

The above Policy and Objective of the Draft Development Plan will provide all the necessary sports facilities fit for purpose, accessible and adaptable for all the residents of Newcastle and not just the members of St. Finians GAA Club.

Chapter 12 Our Neighbourhood.

Housing

Chapter 2 of the Plan, in line with National and Regional policy provisions, sets out a compact settlement form which will require the consolidation of existing residential areas within this neighbourhood area in a manner which protects existing amenities and underpins existing and planned physical and community infrastructure.

The rezoning of rural land to residential land will not provide for the consolidation of the existing urban area defined by the boundaries of the Newcastle Local Area Plan, thus not letting Newcastle Village develop at an incremental pace based on the delivery of social, physical and transport infrastructure and services.

While there is a strong demand for new housing nationally, the DDP clearly demonstrates that there is sufficient residential zoned land within the County of South Dublin to serve local needs up until 2028. Large areas of the residential zoned land under the current DP were not developed by reason of the recent economic downturn and it is now clear that residential developments within the County has gathered momentum in the past few years save as for the Covid-19 lockdown. Residential construction has increased throughout the county, including Newcastle in the past few years. Should this trend continue and if demand still exists, landowners of undeveloped zoned land in Newcastle will be encouraged to commence the process of development.

The Infrastructure Assessment carried out for Newcastle indicates that the area is currently capable of accommodating 851 additional residential units or 2,340 persons representing an increase of 135% on the 2016 Census figure. These units should be allowed to be provided before any further land is rezoned. The development of undeveloped zoned lands will allow for the current deficit of community infrastructure to be provided

Chapter 3 Natural, Cultural and Built Heritage.

Table 3.4 Geological Site for Protection indicated that a County Geological Site for Protection exists in Ballynakelly, Newcastle known as 'Newcastle Burial Channel' and described as "*a deep buried channel in the Carboniferous Limestone bedrock, representing the site of a former Vauclosian Spring type cave (a large resurgence of groundwater from a cave)*".

Such Sites are protected by the following Policy and Objective.

Policy NCB12: Geological Sites

Maintain the conservation value and seek the sustainable management of the County's geological heritage resource.

NCBH12 Objective 1:

To protect identified County Geological Sites from inappropriate development and to promote the importance and potential of such sites through the County's Heritage Plan

Re-zoning rural land to residential land could during the course of carrying out of development have an adverse effect on the 'Newcastle Burial Channel' arising from inadvertent damage, contrary to the above Policy and Objective.

Precedent.

Green Belts as a Use Zoning Objective were a feature in previous Development Plans and were omitted from the 2016-2022 Development Plan. Under the 2010-2016 DP, the lands north of the R120 (Newcastle to Rathcoole Road) situated between the build form in Newcastle Village and Greenogue Industrial Estate were subject to 'GB' Zoning Objective. The submission seeks the reinstatement of this zoning objective on both sides of the R120 in the new Development Plan. A Green Belt Zone will provide greater protection from the influence of urban type developments than a 'RU'-Zone.

Conclusion.

Rezoning lands in Newcastle for residential purposes will increase growth in the building of houses contrary to the proper planning and sustainable development of the area by not letting the growth take place at an incremental pace based on the delivery of social, physical and transport infrastructure and services, within the boundaries of the Newcastle Local Area Plan.

It is imperative, that Newcastle Village protects its own identify in perpetuity by way of the provision of Green Belts around its edges.

Sean and Geraldine Fitzgibbon support the implementation of the above policies and objective of the Draft Development Plan, in particular the provision of recreational facilities in line with the policies and objectives of Chapter 8 of the Draft Development Plan.

James McInerney
Planning Consultant

GAA Club supports development of 250 houses with promise of new sport facilities



ZONING: A joint proposal was submitted for rezoning of this site from agricultural to residential

By Aileen O'Flaherty
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A LOCAL GAA club and a property developer in Newcastle have submitted a joint proposal to South Dublin County Council for the rezoning of land in Rathcoole from agricultural to residential use, with potential for the development of 250 houses.

St Finian's GAA Club and developer and club member Con McCarthy recently submitted the proposal, concerning a site at Rathcoole, adjacent to Newcastle Cemetery.

According to the proposal, Mr McCarthy has committed to providing a minimum of 3.2 hectares of the 26-acre site, and "significant funding", to develop leisure and recreational facilities at the site for use by the GAA and the wider community.

These facilities, including an all-weather pitch, basketball courts, dressing rooms, and walking, cycling and jogging tracks on a c.10-acre recreational facility, are to be developed as part of the proposed rezoning and subsequent development of the subject lands.

The subject lands are owned by Mr McCarthy, who stated that the aim of the proposal is to "outline the need to deliver sporting facilities" for St Finian's and the community, "which would be developed in tandem with the delivery of a housing project".

St Finian's stated that Newcastle is "starved of recreational facilities" and, in relation to the housing aspect of Mr

McCarthy's plans, they said the development would result in "a very significant planning gain that will benefit generations of children and young adults."

"The developer wouldn't make the proposal at all without it being a joint proposal and without it having widespread community support."

Thomson O'Connor Town Planning, in a proposal submitted on behalf of St Finian's and Mr McCarthy, stated that in the midst of "an acute housing crisis", lands zoned for new residential development in Newcastle have "not been forthcoming to an extent that meets the demand" envisaged in the County Development Plan and within the Newcastle Local Area Plan 2012.

"The subject lands have the potential to provide residential development, in addition to community facilities to enable the growth of Newcastle as a small town," according to Thomson O'Connor.

A possible motion was also included in the proposal, which suggested seeking to extend the boundary of the Newcastle Local Area Plan to encompass the subject site and the adjacent cemetery.

It's also noted in the suggested motion compiled as part of the proposal that the "land and the facilities must be provided before any development can take place on the remainder of the site".

Decisions relating to the rezoning of sites in the county are ultimately decided by councillors - who can submit motions suggesting the rezoning of sites - when they vote on the draft County Development Plan, which is currently under review.