

**Moffash ULC
Lisgrew
Emyvale
Co. Monaghan
H18 Y362**

Senior Executive Officer
Forward Planning Section
Land Use Planning & Transportation Department
County Hall
Tallaght
Dublin 24

**LAND USE, PLANNING
& TRANSPORTATION DEPT.**

21 APR 2022

20th April 2022

Re: South Dublin County Development Plan – Submission – Robert Moffett, Moffash ULC, Enterprise and Employment Lands – Material Alteration 2.20 Enterprise and Employment Zones.

To whom it may concern,

I wish to make a submission regarding the above material alteration to the South Dublin County Development Plan which saw the additional zoning of lands for the purposes of Employment and Enterprise lands in the County from 2022-2028 (see map below).



These lands were added to increase the amount of land zoned as enterprise and employment in order to support growth and enterprise strategies in South Dublin County Council over the next seven years.

Directors: Robert Moffett Sam Moffett

Secretary: MT Advisory Services Ltd

Registered Office: Lisgrew, Emyvale, Co. Monaghan

CRO No: 542900

The addition of these lands as Enterprise and Employment are welcome as we believe that there has been a serious under-estimation regarding the amount of zoned land in the County Development Plan for Enterprise and Employment.

We have submitted to every local representative on the Council an independent report carried out by CBRE in respect of the amount of lands zoned Enterprise and Employment in the SDCC Development Plan. This report analyses the actual land that will be available for development and the findings are that there is a severe lack of availability of enterprise development lands in the draft county development plan at its current stage.

It should be noted that the only additional zoning to enterprise and employment land that has taken place in the last development plan and what is now proposed in the draft CDP are the lands controlled by South Dublin County Council. These lands are maintained for FDI and therefore, in reality no new enterprise and employment land has been added outside of this for the past 14 years in South Dublin County Council, whilst at the same time demand for industrial land in the area has increased significantly.

In the draft plan it states there are 624 hectares of zoned land for Enterprise and Employment in South Dublin County Council area. We had commissioned CBRE to conduct an independent review of the proposed lands to be zoned in the draft plan, and their analysis suggests that the true volume of land currently available for new development is a fraction of this quantum. Therefore, if the plan is adopted as it currently stands then SDCC is putting itself at a serious disadvantage in terms of the availability of land for development that can accommodate enterprise and employment over the duration of the new plan.

CBRE have conducted this thorough analysis, which we attach for your information, and they have mapped all land currently zoned for 'Enterprise & Employment' in the South Dublin County Council area and by a process of elimination concluded that there is actually limited availability of zoned land for private occupiers and developers.

In their analysis they have specifically excluded lands that are in the ownership of the local authority or the Industrial Development Authority which are reserved exclusively for Foreign Direct Investment (FDI) and lands that are designated for regeneration.

Their analysis shows that when local authority/IDA owned land and sites designated for regeneration are specifically excluded, of the remaining zoned land, 242 acres or 97.93 hectares is currently under offer/reserved and therefore not available to acquire or develop.

A further 126.64 acres or 51.3 hectares is controlled by developers and/or owner occupiers and not available to purchase or develop. This leaves a residual figure of only 88.16 acres or 35.68 hectares that is available for development at this juncture.

We note in the Chief Executives own recommendations for the draft plan he recommended a review after two years regarding the amount of zoned land for Employment and Enterprise.

"CE Recommendation:

To insert a new objective into Policy CS5 to read:

To ensure, that as part of the two-year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:

- *Analysis of the type of employment need*
- *Analysis of the appropriate location/s to serve such need*
- *Relevant National and Regional policy and proper planning and sustainable development."*

While we note the CEOs recommendation, the mapping evidence we are submitting to you, demonstrates the need for additional employment and enterprise lands to be zoned before the plan is fully adopted and not 2 years later as recommended.

In this submission, we are requesting the Council, when considering this amendment to the County Development Plan, to consider further amending the plan, after a review of the enterprise and employment zoned lands is analysed and quantified, to add additional enterprise and employment zoned land to accommodate new developments during the lifespan of this development plan.

It should also be noted that South Dublin County Council have rezoned 612 acres of Enterprise and Employment lands for regeneration. A substantial portion these lands, over the lifetime of this development plan will be repurposed, sequentially for residential use. Many of the businesses that operate on these lands will need to relocate, given the very small amount of available enterprise and employment land currently zoned in the draft plan, they will not be able to do so in the South Dublin County Council Area.

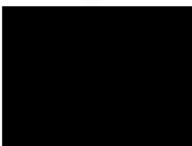
We firmly believe that SDCC is putting itself at a serious competitive disadvantage in comparison to neighbouring Local Authorities due to its under-estimation of the required enterprise development lands in the new plan and this will manifest itself in loss to the council of revenue from development charges and Business rates as development will not occur to the scale it should do in this local authority area over the coming years.

Earlier in the County Development Process we made two submissions (Unique Reference Number: SD-C195-79 and SD-C195-80 see both attached) regarding lands we own in order to have them zoned as enterprise and employment. We believe that these lands should now be considered in the same light as Con McCarthy's lands at Greenogue Business Park, which was amended and is the basis for this submission.

These parcels of land have very similar characteristics in that they are or will be extensions of existing business parks which have ready access to services and therefore are very suitable to be incorporated into any additional zoning, which will help South Dublin County Council in achieving its enterprise and employment strategies.

We hope that you accept this submission and review the quantum of zoned land for enterprise with a view to amending the County Development Plan accordingly so that this issue can be addressed and corrected in order to avoid South Dublin County being at a severe disadvantage in meeting the economic needs of its citizens over the coming seven years.

Yours sincerely,



Robert Moffett
Moffash ULC

MARSTON

PLANNING CONSULTANCY

Senior Executive Officer
Forward Planning Section
Land Use Planning and Transportation Department
South Dublin County Council
County Hall,
Tallaght,
Dublin 24

13th September 2021

Our Ref. 21054

Re: Draft South Dublin County Development Plan 2022-2028

Formal written submission

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by our clients Moffash Ltd., Profile Park, Grange Castle, Clondalkin, Dublin 22 to make a formal submission on the provisions of the Draft South Dublin County Development Plan 2022-2028. The lands which are the subject of this submission equate to c. 6.5 ha. and are generally located to the immediate south of Profile Park Business Park, and include part of the permitted road infrastructure within the Business Park (at its north-west corner); and to the north of the Baldonnel Road.

Our clients' welcome the preparation of the Draft South Dublin County Development Plan (Draft CDP) but are of the considered opinion that there is a need to extend Profile Park to the south so that it does not form an isolated land use zoning and can integrate with other EE zoned lands to the north and west; as well as enabling a strategic pedestrian / cycle link with the Baldonnel Road. This link formed an objective of the 2016 County Development Plan, but for an unknown reason has been removed under the Draft CDP.

Profile Park is currently subject to several live and substantive planning applications. Details of these are provided within this submission. This substantially reduces the capacity of the privately owned business park, which forms the only other business park with capacity and existing infrastructure ready to facilitate development apart from SDCC owned land.

Summary of Key Points and Recommendations:

- Our client's land holdings are strategically located within Grange Castle and as a result they are ideally located to contribute to the creation and accommodation of a form of development which supports the employment growth of South Dublin;
- The employment zoning and future development of our clients' lands will contribute to the creation of a stronger, connected, sustainable and vibrant employment area that is already serviced with existing infrastructure, as well as being well served by public transport;
- The current RU zoning forms an isolated inappropriate zoning for the lands that border EE zoned lands to the north and west; and
- The lands are already serviced and contain infrastructure and are well placed to provide for new employment growth in a location that conforms with the strategic aim of the Council to encourage sustainable growth and development within the wider Grange Castle area.

The basis of this submission is to ensure that changes put forward under the Draft CDP relating to the zoning of lands within Profile Park do not in any way compromise the ability of our client's lands to positively contribute in a logically and sequential manner to the proper planning and sustainable development of the strategic employment area in accordance with National, Regional and Local Planning policies as well as national guidelines.

We submit that from a proper planning and sustainable development perspective it is inherent that the content of the adopted CDP does not constrain the delivery of the sustainable development and growth of employment in location such as our clients lands. The lands that are subject of this submission provide a strategic opportunity for the creation of a planned expansion of the business park. The basis of this submission is to seek the zoning for the subject lands that supports Employment and Enterprise zoning on the lands in close proximity to existing EE zoned lands.

1. Location of our clients' lands (the subject of this submission)

The lands of 6.5ha. which are the subject of this submission are in the ownership of Moffash Ltd. (refer to the aerial view below and outlined in red) as is the Profile Park Business Park (outlined in blue). The lands have been in agricultural use and contain a substantive two storey property and garage as well as a number of farm buildings, sheds etc.. The lands are located to the immediate south of the existing Profile Park lands (see below full extent) and to the immediate east of lands owned by Google and their existing data centres; and to the west of the Grange Castle golf course. The Casement Aerodrome, Baldonnel and all of the buildings associated with it, is located to the immediate south, and to the south of the Baldonnel Road.



Full extent of Profile Park extension in context of existing Profile Park

The site of 6.5ha. is currently zoned RU under the Draft CDP. It forms the largest remaining RU zoned lands; and is surrounded to the north and primarily also to the west by Enterprise and Employment (EE) zoned lands. A further slither of RU zoned lands (c. 1ha.) abounds our clients lands to the west that are in the ownership of Google and within the site of their two data centres. There would appear to be no proper planning and sustainable development rationale for our clients lands remaining as being zoned as RU. The western slither (Google) of lands already forms part of a commercial site, and our clients lands have none of the characteristics that should apply to the RU zone, and indeed forms part of a concurrent application as well as having a commercial business park access road within it. There is no planning basis for these lands to protect and improve rural amenity and to provide for agriculture uses.

The surrounding zoning to the south is also zoned RU and forms the single landholding of the Casement Aerodrome. This land use zoning remains solely to the south of the Baldonnel Road apart from a small pocket of RU zoned land surrounded by the golf course, known as Baldonnel House and Orchard to the east. The golf course to the east has an Open Space zoning.



Excerpt from Draft CDP showing Profile Park extension in context of RMPs and protected structures

There are a number of archaeological features on the lands that are the subject of this submission that form individual Recorded Monuments and Places and are:

Map Ref.	Description	Record and Monuments and Places Ref.
R149451	Castle - unclassified	DU021-004
R149451	Ecclesiastical enclosure	DU021-005003
R149451	Graveyard	DU021-005002
R149451	Church	DU021-005001

The Record of Monuments and Places (RMP) lists structures, features, objects or sites of archaeological heritage are known as Recorded Monuments. This list is compiled by the National Monuments Services of the Department of Housing, Local Government and Heritage. One of these Recorded Monuments are also protected as they form a protected structure and are described as thus under the Draft CDP:

- Kilbride - Stone Church (Ruin) & Graveyard, Ringfort (Rath / Cashel), Earthwork(s) (RM)

The Draft CDP includes a number of policies and objectives for dealing with and addressing Recorded Monuments. These are:

NCBH13 Objective 3: To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.

The Draft CDP also states that a Conservation Plan may be required for development in the vicinity of a site or monument included in the Record of Monuments and Places, to ensure the ongoing protection of the monument and its setting. It is notable that the Sites and Monuments Record are not a prohibiting factor to development as is evident in permissions that have been granted to Cyrus One Irish Data Centre Holdings Ltd. under Planning Ref. SD18A/0134; as well as to UBC Properties LLC under Planning Ref. SD20A/0121 on lands within Grange Castle South Business Park to the immediate west of Profile Park as shown on the following page.



Excerpt from Draft CDP showing Profile Park extension in context of RMPs on other development sites zoned as EE

2. Availability of zoned land not in the ownership and control of the County Council

We respectfully submit that as part of this submission we have done an assessment of the availability of EE zoned land that is not in the control or ownership of the County Council within the Grange Castle area. This submission is made in collaboration with CBRE that have undertaken a review of the take up of such land, and an indication of a proven demand for such zoned land in the west Dublin area. This report should be read in collaboration with our report.

Whilst the EE zoning is spread out across the county that sits generally around the periphery of the city in a wide range of private and public ownerships, the EE zoned in Grange Castle are primarily within the control of the County Council. This clearly has the potential to unduly influence the market in terms of Irish and international inward investment in the area. It also has the potential to manage development in a manner that is not attractive to certain developers that provides a more prescriptive control of the development of sites.

We respectfully submit that Profile Park has long offered an excellent location to businesses wishing to locate in the area. This has resulted in Google acquiring a large section of the Park to the south-west. The continuing popularity of the Park for development is clearly evident in the map below that shows the recent permissions and current applications that have been made in Profile Park, as outlined below. If the outstanding applications all receive permission, and two of which have received recent positive requests for further information, and are subsequently built out it will leave only c. 4ha. of EE zoned land within Profile Park to be developed when the land now owned by Google is allowed for.

Reg. Ref. SD20A/0124

This application for a logistic warehouse development of 17,006sqm was applied for, and following a request for, and submission of Additional Information was granted permission on the 17th December 2020.

Reg. Ref. SD21A/0167

This application by Greener Ideas was lodged on the 25th June 2021 for a gas fired power plant on lands within Profile Park. A request for Additional Information was sought by the Planning Authority on 9 issues on the 19th August 2021. The Additional Information included concerns that the Council had in relation to the bulk and massing of the proposed development as well as noise impacts on the nearest residential properties.

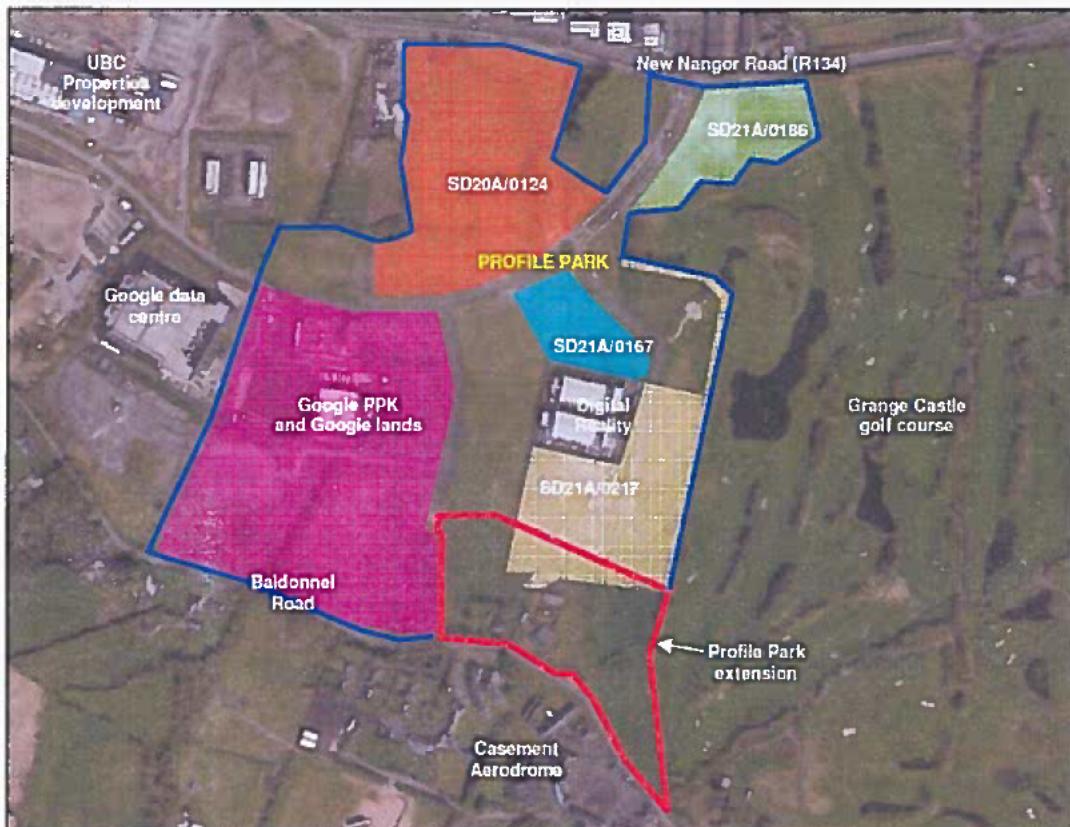
Reg. Ref. SD21A/0186

This application by Equinnix (Ireland) Ltd. for a three storey data centre of 9,601sqm was applied for on the

5th July 2021, and resulted in a request for Additional Information on six issues being sought on the 30th August 2021. This included concerns about the visual impact of the proposal.

Reg. Ref. SD21A/0217

This application by Digital Netherlands VIII B. V. for two no. two storey data centres with a gross floor area of 33,577sqm was made on the 4th August 2021. A decision on the application is due at the end of September. This application is notable as the red line boundary depicting it extends into the RU zoned lands to the south that form the basis of this submission.



Full extent of Profile Park extension in context of existing Profile Park permissions and applications

Availability of EE zoned lands elsewhere

It is also notable that the original Grange Castle Business Park that is operated under the wider South Dublin County Council umbrella in collaboration with the Industrial Development Authority (IDA) and is the location of companies such as Pfizer, Microsoft, Takeda, Arytza and Edgeconnex among many others has little capacity for further development. In recognition of the business park filling up the County Council extended it to what is known as Grange Castle South Business Park to the west of Profile Park; and this is now subject to two large data centre developments that are under construction that utilise all of this new business park.

Due to the above, the level of EE zoning was significantly extended by 193.47ha. under Variation no. 1 of the South Dublin County Development Plan 2016-2022 (as outlined in red on the following page) into what is now known as Grange Castle West. Permission was granted under a Part 8 application for a new road to extend into these lands from the end of the New Nangor Road (R134) under SD188/0009 and these works are ongoing. The majority of these 193.47ha. of newly zoned lands that remain undeveloped are in the ownership of SDCC. It is notable that c. 22ha. of these lands in Grange Castle West have already been committed to be developed as the country's largest media park for film and TV studios.

Furthermore, we refer the Council to the attached report undertaken by CBRE that highlights that the area is a location of choice for occupiers of EE zoned land that is currently hampered by a shortage of modern accommodation and sites to facilitate new development. Despite the locations historic dominance as an industrial location, the shortage of modern accommodation and more importantly land to facilitate the

development of same, is leading to leakage to other locations. This is due to a scarcity of completed buildings and sites to facilitate the delivery of build-to-suit options in this location.



Extent of Grange Castle west rezoning (outlined in red) under Variation no. 1 of the South Dublin County Development Plan 2016-2022

The only additional undeveloped EE zoned lands are those located to the north of the Peamount Road and to the east of Peamount Hospital; and a triangular parcel of land between the Peamount Road and Aylmer Road. It is notable that the lands between the Peamount Road and Aylmer Road are primarily in two ownerships. A small triangular unserviced portion of lands and the rest (c. 57ha.) in the ownership of Amazon who are already invested within Grange Castle. The larger portion are therefore also unavailable for future development compatible with the EE zoning beyond that required by Amazon. All these undeveloped lands do not contain available services and infrastructure, and are located remote from public transport compared to the Profile Park extension lands.

3. Inappropriate Approach to the zoning of lands within the Draft County Development Plan

This section of the submission examines the case for the zoning of our clients' strategic lands within the Draft CDP. It is noted that the Draft CDP does not identify our clients lands for new enterprise and employment development and does not identify an evidence based assessment for the zoning of the lands in the manner identified.

Contrary to the principles of National and Regional planning policy the Draft CDP does not identify appropriate zonings for these strategic lands in close proximity and surrounded by other EE zoned lands. There appears to be no rationale for our clients lands to remain zoned as RU. Whilst there are national monuments and a protected structure on site, it has clearly been proven that such matters can be addressed as part of the planning application process. Whilst one of these national monuments is a graveyard and protected structure, it is located within the narrow eastern part of the site; and any new rezoning of the land and future development of the land would need to take this into account in its overall layout and archaeological investigations. It should not form an impediment to its zoning for EE purposes.

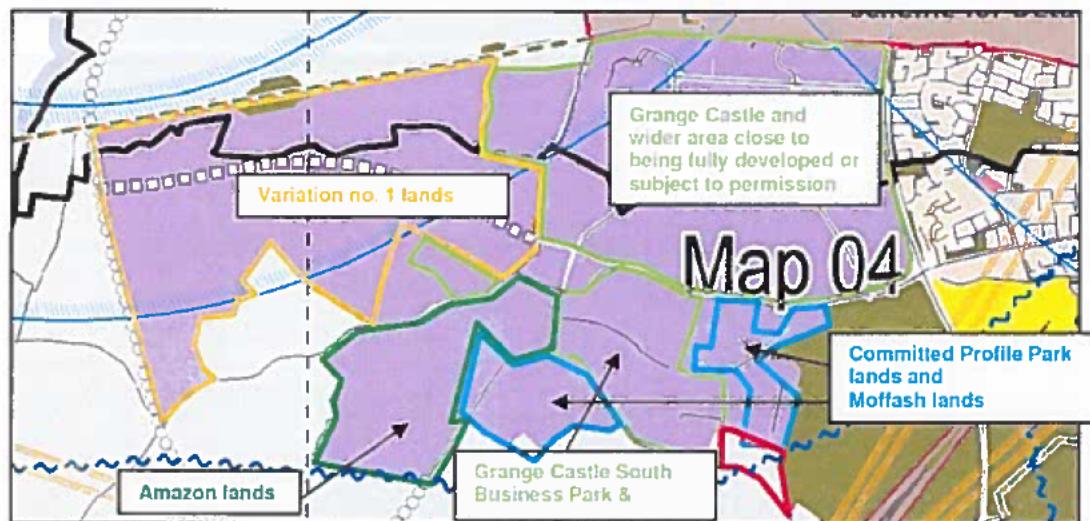
There are no other basis for keeping the existing RU zoning on the site. A specific objective could also be added to the zoning of the site that required access through the existing Profile Park and that pedestrian / cyclist access only would be allowed from Baldonnel Road. This would follow the pattern of development within Profile Park and Grange Castle South Business Park where no vehicular access is permitted from Baldonnel Road.

The Core Strategy of the Draft CDP states that this area (Grange Castle), including our clients lands, is an Employment Area within the Dublin MASP Area set out under the Regional Spatial and Economic Strategy that should be actively adhered to under the County Development Plan. Whilst it cannot be argued that significant levels of land are zoned for employment in the area they are significantly further outside the existing built up area and within Grange Castle West. Any assessment of their suitability as a location for employment zoned land against our client's small pocket of RU zoned land must in any objective

consideration lead to a conclusion that our client's lands offer a more sustainable expansion of employment zoned lands.

They are serviced and contain the necessary infrastructure to facilitate employment uses immediately, and are at a different scale that may attract smaller developments than the larger sites further outside the existing built up area of the County. It is an important consideration that a significant level of the land under Variation no. 1 and non-developed land are currently not serviced, which is a key part of the consideration under the Core Strategy for identifying new EE zoned lands.

Furthermore, it is notable that the zoning of these lands of 6.4ha. would not impact on the ability to develop the 554ha. of land zoned for Enterprise and Employment under the Draft Plan. It would simply provide a logical extension of the zoning that currently surrounds the site to the north and west; with two large land use banks that form the golf course to the east; and the Casement Aerodrome to the south that will not alter in the long term. There is no planning basis therefore for the lands to remain zoned as RU, and it currently forms an anomaly within the Draft Plan.



Furthermore, the lands are located within 800m walk of a high intensity public transport link connecting the Grange Castle Business Park with the city centre and Ballymun / Santry that operates at a frequency of every 10 minutes during peak hours. This does not apply to large areas of the undeveloped EE zoned lands identified in this area under the Draft CDP.

We note that Policy CS5: Lands for Employment of the Draft CDP states that employment land should be located in the right place and Objective 1 states that employment should be focussed around high capacity public transport. We respectfully submit that the EE zoning of our client's lands fully confirm with this strategic aim and objective of the Draft Plan.

4. Rationale for considering lands for EE zoning?

We note that the Draft CDP does not include our client's lands within the extensive EE zoning that covers the wider Grange Castle area. It is clear from our review of the proposed new zonings that our clients lands are well serviced with existing infrastructure and with ready access to public transport; and form a natural extension of the Profile Park Business Park.

Policy EDE1 of the Draft CDP fully supports the growth of employment areas within the Dublin MASP area; and to support enterprise and innovation and attract investment (Objectives 1 and 2). This requires that a broad range of EE zoned land are available within the County, and particularly within Grange Castle area that not only supports international investment through large pharmaceutical and IT companies wishing to locate within the Dublin MASP area, but also facilitates the expansion and development of other sectors that offer support and services to the growing scale of industry in the area (Objective 3). The proposed natural extension of Profile Park fully conforms to EDE1 Objective 3 in that it is:

- At a suitable location that can accommodate a range of enterprise and employment development types;

- Its zoning would promote compact growth; and
- Due to its location closer to housing areas and public transportation links offers a more sustainable location that would generate lower journey times.

Our clients lands also offer the opportunity to create a pedestrian / cycling link through from the New Nangor Road to the Baldonnel Road. This formed an objective under the 2016 Plan, but has been removed for unknown reasons under the Draft CDP. We request that this objective be reintroduced under the adopted Plan aligned with the rezoning of the RU zoned lands to EE. This link will offer a sustainable link to and from land uses to the south and improve the connectivity of the wider Grange Castle area.

Our client's strongly support the aim of the Council in seeking to develop a broad range of EE zoned lands within the county in an integrated manner aligned with public transport and residential populations. However, it is noted that the Draft CDP fails to recognise other EE zoned lands within the wider Grange Castle area; and it is requested that references to Grange Castle Business Park should be extended to Grange Castle Business Park and wider area under Chapter 9 of the Draft CDP.

Recommendations

Our clients' lands, should be rezoned as EE – Enterprise and Employment to be developed in accordance with a set of key objectives that would include:

- *Development to occur in a manner that respects the national monuments and protected structure on site; and*
- *A pedestrian and cycling link to be created from Profile Park to the Baldonnel Road.*

We are strongly of the opinion that these lands are currently incorrectly zoned that does not reflect their connectivity to the existing services and infrastructure within Profile Park; and should be rezoned for enterprise and employment in accordance with similarly zoned lands to the north and west. This would offer a coherent form to the zoning of the land that properly reflects zoning and land use to the north of the Baldonnel Road in this location.

Given the strategic location of our clients' lands it is considered that the approach to land use zoning under the Draft CDP, in relation to our client's lands must be called into question. This approach to land use zoning is contrary to National and Regional planning policy. On that basis we would request that South Dublin County Council allocate the EE zoning to our clients' lands.

5. Strategic planning policy that supports the review of the zonings under the Draft CDP

Our client's land holdings are strategically located within the Dublin MASP area and offers an opportunity to widen the nature and form of EE zoned lands in the county. The Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy (RSES) identifies the Grange Castle Business Park and area as a strategic employment development area within the region that forms a strategic corridor for growth and employment within the Dublin MASP area. The proposed modest rezoning of 6.5ha., and its change from RU to EE fully conforms with this strategic objective of the RSES.

Furthermore, RSES clearly sets out the need to integrate land use and transportation, and recognises that future development in the Dublin Metropolitan Area should be planned and designed in a manner that facilitates sustainable travel patterns. The rezoning of the RU zoned lands is fully in accordance with this Regional Policy Objective 5.3 of RSES as it will facilitate employment generating land use in close proximity to public transport, and at the same time delivering a pedestrian / cycle link to Baldonnel Road.

The zoning and future development of our clients' lands will contribute to the creation of a stronger, connected, sustainable and vibrant Grange Castle. The EE zoning of our clients' lands would constitute an appropriate form of zoning of lands in close proximity to immediately adjoining EE zoned lands.

It is clear that the CDP (when adopted) will play a critical role in the delivery of employment in the right places '*to deliver compact growth*' in accordance with the National planning policy mandate. The first element of this is to ensure that the allocation of future growth is directed towards areas sequentially located to existing development – the subject lands are strategically located from that perspective. Our clients' lands

can be categorised as sequentially located lands which in the interests of proper planning should be appropriately zoned for development.

We note that the National Planning Framework (NPF) identifies the challenges for the managing of future growth:

'A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.'

In terms of employment policy, the proposed development accords with the NPF's core principles for employment delivery – in particular that the location of new employment be prioritised as close as possible to serviced land, public transport and residential areas. The site acts as a natural extension to Profile Park, and for which a service road already exists at its north-west corner

In accordance with National Policy Objective 11, the development of our clients' landholding will be provided at a sustainable location, with access to existing services and facilities. The future development of our clients' lands (subject to the securing of appropriate consents) will deliver a wider employment mix and utilise sequentially located land to provide employment in compliance with NPF and specific RSES objectives.

The strong planning rationale for the filling in of the EE zoned lands so that our clients' lands do not remain an isolated and underutilised parcel of land is that the sequential development of EE zoned land will assist in promoting a more compact urban form, in close proximity to existing services and infrastructure. This approach would both avoid the uncontrolled expansion of EE zoned lands further west, but is considered to fully align with the aims and objectives of the National Planning Framework which are reiterated through the RSES.

Having regard to the above as well as the specific location of our clients' lands, it would seem logical from a land use planning perspective to rezone the subject lands. This would provide for the development of the subject site and cement the future logical synergy between the zoning of lands at the subject site and surrounding lands.

6. Conclusions

It is in the interests of the sustainable development of Grange Castle and Profile Park that land in proximity to existing EE zoned land, and for which the Draft CDP zoning is unrelated to any proximate zoning, with only the large landholding of the Casement Aerodrome similarly zoned in this location, and for which the lands have no inter-relationship, is zoned as EE under the County Development Plan.

Our clients request that South Dublin County Council re-examine the RU zoning attached to their strategic landholding in close proximity to existing employment zoned and developed lands in Grange Castle and Profile Park.

The aim of the new Plan should be to promote sustainable employment patterns by locating growth into the key areas of the county that are well serviced with existing infrastructure rather than relying on dispersed locations that are lacking in the necessary infrastructure to support it.

We submit that our clients' lands immediately adjacent to Grange Castle and Profile Park are well served by a wide range of existing urban services to facilitate development and promote compact, consolidated employment growth in a sequential manner. They also offer a broader range of development opportunities for employers of all scales. Given its location within Profile Park this would also not negate the strategic vision for the wider Grange Castle area. The lands are also one of the few sites within the local area that are not within the ownership of the County Council but are also serviced with existing infrastructure. The lands are therefore, subject to addressing the archaeology of the site, that would be necessary for any similar zoned site, and has been addressed on nearby sites, ready to go and should be encouraged to be zoned in an appropriate manner.

In this regard we request that our clients' lands be zoned for Enterprise and Employment (EE) which would constitute an appropriate form of zoning of lands in close proximity to other EE zoned lands to the immediate

north and west rather than remaining an isolated RU zoned parcel of land that contains none of the intrinsic characteristics of such land.

We would be obliged if you will acknowledge receipt of this submission in due course and we would be happy to furnish any further information that you may be required to deal with this matter.

Yours faithfully,



Anthony Marston (MIP1, MRTPI)
Marston Planning Consultancy

MARSTON

PLANNING CONSULTANCY

Senior Executive Officer
Forward Planning Section
Land Use Planning and Transportation Department
South Dublin County Council
County Hall,
Tallaght,
Dublin 24

13th September 2021

Our Ref. 21054

Re: Draft South Dublin County Development Plan 2022-2028

Formal written submission

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by our clients Moffash Ltd., Profile Park, Grange Castle, Clondalkin, Dublin 22 to make a formal submission on the provisions of the Draft South Dublin County Development Plan 2022-2028. The lands which are the subject of this submission equate to two different portions of lands that are 1.3ha. and 20.6ha. in area that are generally located to the immediate south and south-west of the Baldonnel Road. The former smaller sized land parcel of 1.3ha. forms the majority of a 1.5ha. land parcel that is owned by our client's, whilst they have a legal option to purchase the larger portion of land. The additional 0.2ha. forms part of the burial ground lands that sit to the east of the smaller parcel of land.

Our clients' welcome the preparation of the Draft South Dublin County Development Plan (Draft CDP) and welcome the inclusion of an additional landholding of c. 21ha. that are zoned for EE that immediately adjoin these lands to the north. However, it is worthy of note that our client has agreed terms with a potential occupier of these lands, and therefore a significant portion of these lands are likely to become unavailable for development in the near future.

The smaller pocket of land forms an integral part of this already zoned portion of land and forms a natural extension (towards the city) of the EE zoned lands that borders the site to the north and west. The area is not subject to any substantive planning applications or permissions. However, it is notable that a large portion of land (c. 57ha.) between the Peamount Road and the Aylmer Road has recently been purchased by Amazon. These lands that are all zoned for EE purposes are unavailable for future development compatible with the EE zoning beyond that required by Amazon. The Amazon lands extend 1.3kms to the south-west of the recently realigned section of the Baldonnel Road. Despite this, a significant portion of lands closer to the city and sitting to the south of our clients zoned lands that sit between the Baldonnel Road and Aylmer Road remain unzoned for development in being zoned as RU. This in our considered opinion does not reasonably nor adequately reflect their suitability for future development.

Summary of Key Points and Recommendations:

- Our client's land holdings are strategically located within Grange Castle and as a result they are ideally located to contribute to the creation and accommodation of a form of development which supports the employment growth of South Dublin;
- The employment zoning and future development of our clients' lands will contribute to the creation of a stronger, connected, sustainable and vibrant employment area that has capacity to be well serviced with existing infrastructure;
- The current RU zoning forms an isolated inappropriate zoning for the lands that border EE zoned lands to the north and west;

- The lands are well placed to provide for new employment growth in a location that conforms with the strategic aim of the Council to encourage sustainable growth and development within the wider Grange Castle area and are located less peripheral than the Grange Castle West zoned lands.

The basis of this submission is to ensure that changes put forward under the Draft CDP relating to the zoning of lands to the south-west of the Baldonnel Road do not in any way compromise the ability of our client's lands to positively contribute in a logically and sequential manner to the proper planning and sustainable development of the strategic employment area in accordance with National, Regional and Local Planning policies and guidelines.

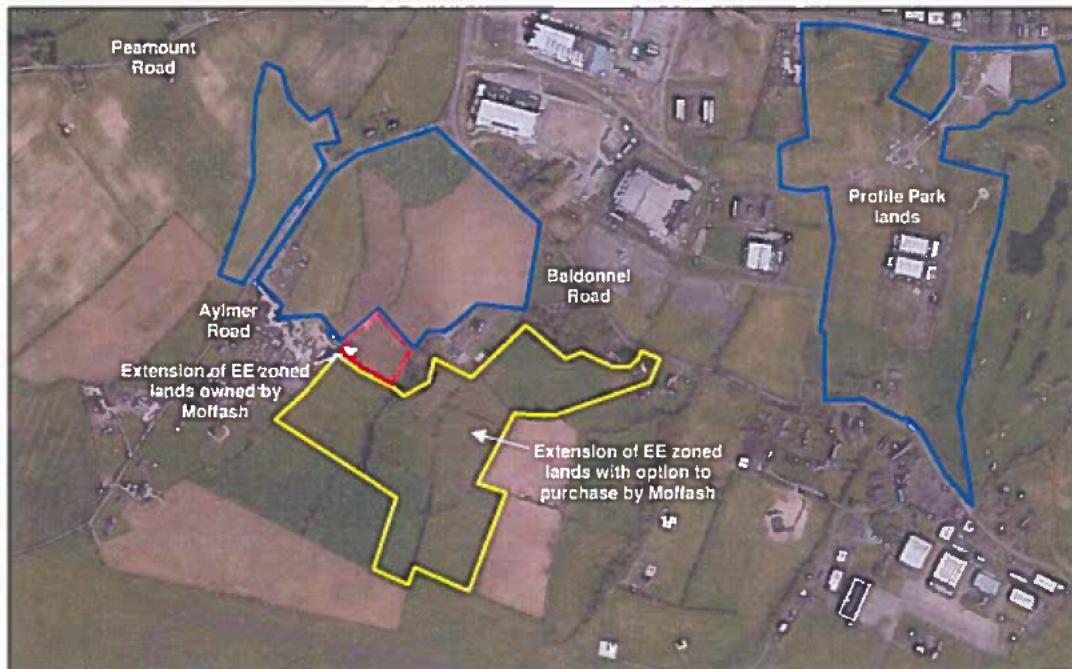
We submit that from a proper planning and sustainable perspective it is inherent that the content of the adopted CDP does not constrain the delivery of the sustainable development and growth of employment in locations that form the basis of this submission. The lands that are subject of this submission provide a strategic opportunity for the creation of a planned expansion of already zoned EE lands. The basis of this submission is to seek the zoning for the subject lands that supports Employment and Enterprise zoning on the lands in close proximity to existing EE zoned lands.

1. Location of our clients' lands (the subject of this submission)

The lands of 1.3ha. which are the subject of this submission are in the ownership of Moffash Ltd. (refer to the aerial view below and outlined in red) as are all other land outlined in blue that includes Profile Park, and its proposed extension of its zoning that is subject to a separate submission on the Draft County Development Plan.

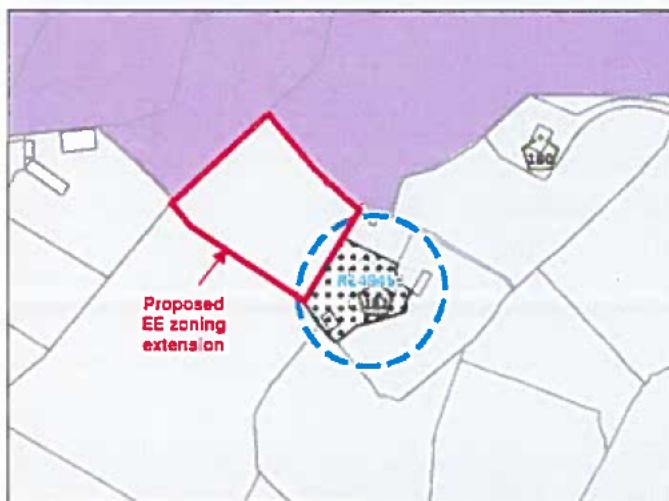
The lands of 20.6ha. are in separate ownership but Moffash have an option to purchase the land, subject to zoning, and are outlined in yellow below. The two parcels of lands that are subject of this submission have been in agricultural use and contain substantive field boundaries and other green infrastructure.

The smaller portion of lands (outlined in red) are located to the immediate south of the existing landholding of our client that is zoned EE and to the immediate west of a burial ground that forms a recorded monument and a protected structure. This smaller portion of land forms a natural extension of the zoning of their land holding. The larger landholding is located further south and extends from the light industrial use bounding the Aylmer Road to the west; and borders the landholding associated with the Casement Aerodrome to the south as well as linking through to the Baldonnel Road to the east.



Aerial map showing full extent of Moffash land zoning request

The site of 1.3ha. is currently zoned RU under the Draft CDP. Lands to the north and west of these lands are zoned as EE, whilst the protected burial ground bounds the site to the east (see below excerpt). There would appear to be no proper planning and sustainable development rationale for our clients lands remaining as being zoned as RU. Given the surrounding zoning and land use to the north and west, and ownership, there is no planning basis for these lands to protect and improve rural amenity and to provide for agriculture. The surrounding zoning to the south is also RU.



Excerpt from Draft CDP showing proposed EE zoning extension in context of RMP and protected structure

There are archaeological features on the lands that are the subject of this submission that form individual Recorded Monuments and Places and are:

Map Ref.	Description	Record and Monuments and Places Ref.
R149452	Font	DU021-003004
R149452	Graveyard	DU021-003002
R149452	Church	DU021-003001
R149452	Ecclesiastical enclosure	DU021-003003

The Record of Monuments and Places (RMP) lists structures, features, objects or sites of archaeological heritage are known as Recorded Monuments. This list is compiled by the National Monuments Services of the Department of Housing, Local Government and Heritage. One of these Recorded Monuments is also protected as they form a protected structure and are described as thus under the Draft CDP:

- Kilmacthalway – Ecclesiastical Remains, Church, Font, Graveyard and Enclosure (RM)

The Draft CDP includes a number of policies and objectives for dealing with and addressing Recorded Monuments. These are:

NCBH13 Objective 3: To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.

The Draft CDP also states that a Conservation Plan may be required for development in the vicinity of a site or monument included in the Record of Monuments and Places, to ensure the ongoing protection of the monument and its setting. It is notable that the Sites and Monuments Record are not a prohibiting factor to development as is evident in permissions being granted to Cyrus One Irish Data Centre Holdings Ltd. under Planning Ref. SD18A/0134; as well as to UBC Properties LLC under Planning Ref. SD20A/0121 on lands within Grange Castle South Business Park to the immediate west of Profile Park as shown on the following page. It should also be known that the lands sought to be rezoned are primarily outside the zone of notification of the Sites and Monuments Record.



Excerpt from Draft CDP showing EE zoning extension in context of RMPs on other development sites zoned as EE

Full extent of land zoning request on which Moffatt have an option to buy

The site of 20.6ha. is currently zoned RU under the Draft CDP. There is significant lands zoned further to the west, that as outlined are zoned as EE; and which are primarily bought by a future occupier of the lands and are therefore not available for development. These lands are more remote from services and facilities and available infrastructure than the 20.6ha.. The Casement Aerodrome forms a natural boundary; and whilst also zoned currently as RU, its use does not depict the rural premise of the zoning.

2. Availability of zoned land not in the ownership and control of the County Council

We respectfully submit that as part of this submission we have done an assessment of the availability of EE zoned land that is not in the control or ownership of the County Council within the Grange Castle area. This submission is made in collaboration with CBRE who have undertaken a review of the take up of such land, and an indication of a proven demand for such zoned land in the west Dublin area. The CBRE report should be read in collaboration with our report.

Whilst the EE zoning is spread out across the county that sits generally around the periphery of the city in a wide range of private and public ownerships, the EE zoned lands in Grange Castle are primarily within the control of the County Council. This clearly has the potential to unduly influence the market in terms of Irish and international inward investment in the area. It also has the potential to manage development in a manner that is not attractive to certain developers that provides a more prescriptive control of the development of sites.

We respectfully submit that both the smaller and larger portion of lands that form this submission have the capacity to form a land use link between the Amazon zoned lands between the Peamount Road and Aylmer Road and the Baldonnel Road and the EE zoned lands to its north. The continuing popularity of the area for inward investment and development is reflected in the significant investment in the area by Amazon; the film industry and many other players in this part of the Grange Castle area. It is clear that despite the rezoning of large tracts of land under Variation no. 1 of the 2016-2022 County Development Plan there remains significant demand for such zoned land; and where a significant portion is either committed or is now owned by a committed party and not available as a result to attract future investment into the area. This requires South Dublin County Council to take a broader view of EE land use zoning and ensure that additional land is zoned for such uses. This is particularly the case given the County Council's and the IDA's intention of attracting blue chip companies that will take up large sites into the area.

Availability of EE zoned lands elsewhere

It is also notable that the original Grange Castle Business Park that is operated under the wider South Dublin County Council umbrella in collaboration with the Industrial Development Authority (IDA) and is the location of companies such as Pfizer, Microsoft, Takeda, Arytza and Edgeconnex among many others has little capacity for further development. In recognition of the business park filling up the County Council extended the Business Park to what is known as Grange Castle South Business Park to the west of Profile Park and to the east of the realigned Baldonnel Road; and this is now subject to two large data centre developments that are under construction that utilise all of this new business park.

Due to the above, the level of EE zoning was significantly extended by 193.47ha. under Variation no. 1 of the South Dublin County Development Plan 2016-2022 (as outlined in red below) into what is now known as Grange Castle West. Permission was granted under a Part 8 application for a new road to extend into these lands from the end of the New Nangor Road (R134) under SD188/0009 and these works are ongoing. The majority of these 193.47ha. of newly zoned lands that remain undeveloped are in the ownership of SDCC. It is notable that c. 22ha. of these lands in Grange Castle West have already been committed to be developed as the country's largest media park for film and TV studios.

Furthermore, we refer the Council to the attached report undertaken by CBRE that highlights that the area is a location of choice for occupiers of EE zoned land that is currently hampered by a shortage of modern accommodation and sites to facilitate new development. Despite the locations historic dominance as an industrial location, the shortage of modern accommodation and more importantly land to facilitate the development of same, is leading to leakage to other locations. This is due to a scarcity of completed buildings and sites to facilitate the delivery of build-to-suit options in this location.



Extent of Grange Castle west rezoning (outlined in red) under Variation no. 1 of the South Dublin County Development Plan 2016-2022 and indicating its location relative to the 1.3ha. site

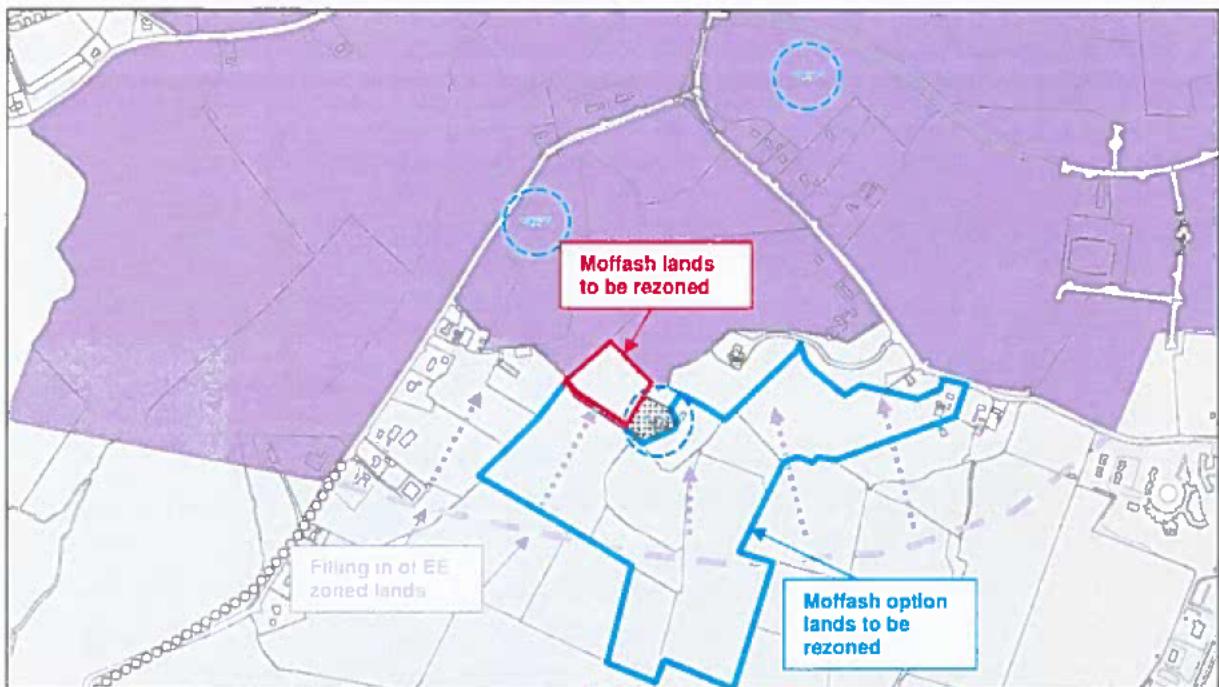
The only additional undeveloped EE zoned lands are those located to the north of the Peamount Road and to the east of Peamount Hospital; the land owned by our clients and committed to a future occupier to the north of both lands subject of this submission; and a triangular parcel of land between the Peamount Road and Aylmer Road. It is notable that the lands between the Peamount Road and Aylmer Road are primarily in two ownerships. A small triangular unserviced portion of lands and the rest (c. 57ha.) in the ownership of Amazon who are already invested within Grange Castle. The larger portion are therefore unavailable for future development compatible with the EE zoning beyond that required by Amazon. All these undeveloped lands do not contain available services and infrastructure, and are located remote from public transport and are therefore more appropriate for low employment generating uses that are compatible with the EE zoning.

3. Inappropriate Approach to the zoning of lands within the Draft County Development Plan

This section of the submission examines the case for the zoning of our clients' strategic lands and the lands to which they have an option of purchasing within the Draft CDP. It is noted that the Draft CDP does not identify our clients lands for new enterprise and employment development and does not identify an evidence based assessment for the zoning of the lands in the manner identified.

Contrary to the principles of National and Regional planning policy the Draft CDP does not identify appropriate zonings for either of these strategic lands in close proximity and surrounded by other EE zoned lands. There appears to be no rationale for our clients lands to remain zoned as RU given our client overall landholding to the north is already zoned EE. Whilst there are national monuments and a protected structure adjacent to the site, it has clearly been proven that such matters can be addressed as part of the planning application process. Whilst one of these national monuments is a graveyard it is located outside of the land sought to be rezoned, and whilst the notification area extends across it; it is just the case that any future development of the land would need to take this into account in its overall layout and archaeological investigations. It should not form an impediment to its zoning for EE purposes. There are no other basis for keeping the existing RU zoning on the site.

The larger 20.6ha. plot also provides a natural fill between the Amazon zoned lands to the west; and the Profile Park lands to the east. They offer a more coherent spatial approach to land use zoning rather than being based on land ownerships.

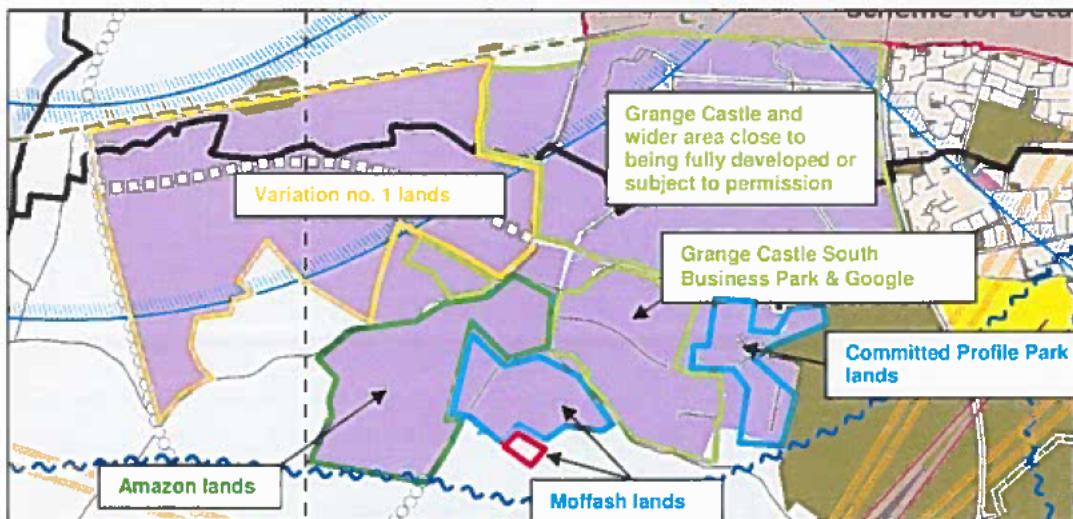


Extent of Grange Castle zoning indicating natural filling in of the EE zoning connecting Aylmer Road and Baldonnel Road / Profile Park

The Core Strategy of the Draft CDP states that this area (Grange Castle), including our clients lands and option lands, is an Employment Area within the Dublin MASP Area set out under the Regional Spatial and Economic Strategy that should be actively adhered to under the County Development Plan. Whilst it cannot be argued that significant levels of land are zoned for employment in the area they are significantly further outside the existing built up area within Grange Castle West. Any assessment of their suitability as a location for employment zoned land against our client's small pocket of RU zoned land and larger option lands must in any objective consideration lead to a conclusion that our client's lands offer a more sustainable expansion of employment zoned lands.

They would be available subject to the necessary infrastructure to be able to facilitate employment uses immediately, and are at a different scale than the larger sites further outside the existing built up area of the County. It is an important consideration that a significant level of the land under Variation no. 1 and non-developed land are currently not serviced, which is a key part of the consideration under the Core Strategy for identifying new EE zoned lands. The lands are no different therefore from a land use perspective, and offer a natural filling in of the EE zoned lands in a location that is more remote from the sensitivities of the Grand Canal. We note the significant policies relating to green infrastructure in the Plan and it clear that any rezoning would be predicated on the need to retain and enhance existing green infrastructure on the lands.

Furthermore, it is notable that the zoning of these lands of the 1.3ha. or larger option lands, would not impact on the ability to develop the 554ha. of land zoned for Enterprise and Employment under the Draft Plan. It would simply provide a logical extension of the zoning that currently surrounds the site to the north and west and the Casement Aerodrome to the south that will not alter in the long term. There is no planning basis therefore for the lands to remain zoned as RU, and it currently forms an anomaly within the Draft Plan.



Extent of Grange Castle zoning and land in original control of County Council and other land of our clients and other land owners – note large take of EE zoned lands apart from County Council land apart from our clients and need for additional privately owned EE lands in the area

4. Rationale for considering lands for EE zoning?

We note that the Draft CDP does not include our client's lands within the extensive EE zoning that covers the wider Grange Castle area. It is clear from our review of the proposed new zonings that our clients lands and the option lands form a natural extension of the EE zoning within the area between Aylmer Road and Baldonnel Road and to the north of the Casement Aerodrome landholding.

Policy EDE1 of the Draft CDP fully supports the growth of employment areas within the Dublin MASP area; and to support enterprise and innovation and attract investment (Objectives 1 and 2). This requires that a broad range of EE zoned lands are available within the County, and particularly within the Grange Castle area that not only supports international investment through large pharmaceutical and IT companies wishing to locate within the Dublin MASP area, but also facilitates the expansion and development of other sectors that offer support and services to the growing scale of industry in the area (Objective 3). The proposed natural extension of the EE zoned lands as outlined under this submission fully conforms to EDE1 Objective 3 in that it is:

- At a suitable location that can accommodate a range of enterprise and employment development types;
- Its zoning would promote compact growth rather than facilitating the further expansion of EE zoned lands to the west; and
- Due to its location closer to housing areas and offers a more sustainable location that would generate lower journey times than many EE zoned lands to the west.

Our client's strongly support the aim of the Council in seeking to develop a broad range of EE zoned lands within the county in an integrated manner aligned with public transport and residential populations. However, it is noted that the Draft CDP fails to recognise other EE zoned lands within the wider Grange Castle area; and it is requested that references to Grange Castle Business Park should be extended to Grange Castle Business Park and wider area under Chapter 9 of the Draft CDP. This is to recognise that Grange Castle is not solely the SDCC owned and managed business park but that a number of private and individual operators own EE zoned land in the area that positively contribute to the EE zoning vision in the area.

Recommendations

Our clients' lands and their option lands, should be rezoned as EE – Enterprise and Employment to be developed in accordance with the need for development to occur in a manner that respects the national monuments and protected structure adjacent to the lands.

We are strongly of the opinion that these lands are currently incorrectly zoned that does not reflect their geographical location and where larger tracts of zoned land are zoned EE and in the ownership of the County Council on land significantly further west. They offer a natural infill of the EE zoning extent currently indicated under the Draft CDP as shown on page 6 of this submission.

Given the strategic location of our clients' lands it is considered that the approach to land use zoning under the Draft CDP, in relation to our client's lands must be called into question. This approach to land use zoning is contrary to National and Regional planning policy. On that basis we would request that South Dublin County Council allocate the EE zoning to our clients' lands and the lands on which they have an option of purchasing. This would offer a coherent form to the zoning of the land that properly reflects zoning and land use to the north and west of this location.

5. Strategic planning policy that supports the review of the zonings under the Draft CDP

Our client's land holdings are strategically located within the Dublin MASP area and offers an opportunity to widen the nature and form of EE zoned lands in the county. The Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy (RSES) identifies the Grange Castle Business Park and area as a strategic employment development area within the region that forms a strategic corridor for growth and employment within the Dublin MASP area. The proposed modest rezoning of 1.3ha., and its change from RU to EE fully conforms with this strategic objective of the RSES. This also applies to the larger 20.6ha. of land to its south and east.

Furthermore, the RSES clearly sets out the need to integrate land use and transportation, and recognises that future development in the Dublin Metropolitan Area should be planned and designed in a manner that facilitates sustainable travel patterns. The rezoning of the RU zoned lands is fully in accordance with this Regional Policy Objective 5.3 of RSES as it will facilitate employment generating land use in closer proximity to population within Clondalkin (to the east) and Lucan (to the north).

The zoning and future development of our clients' lands will contribute to the creation of a stronger, connected, sustainable and vibrant Grange Castle. The EE zoning of our clients' and option lands would constitute an appropriate form of zoning of lands in close proximity to immediately adjoining EE zoned lands.

It is clear that the CDP (when adopted) will play a critical role in the delivery of employment in the right places *'to deliver compact growth'* in accordance with the National planning policy mandate. The first element of this is to ensure that the allocation of future growth is directed towards areas sequentially located to existing development – the subject lands are strategically located from that perspective. Our clients' lands can be categorised as sequentially located lands which in the interests of proper planning should be appropriately zoned for development.

We note that the National Planning Framework (NPF) identifies the challenges for the managing of future growth:

'A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.'

In terms of employment policy, the proposed zoning accords with the NPF's core principles for employment delivery – in particular that the location of new employment be prioritised as close as possible to serviced land, public transport and residential areas. The site acts as a natural extension to the EE zoning of land in this south-west quarter of Grange Castle.

In accordance with National Policy Objective 11, the development of our clients' landholding will be provided at a sustainable location, with potential access to services and facilities. The future development of our

clients' lands (subject to the securing of appropriate consents) will deliver a wider employment mix and utilise sequentially located land to provide employment in compliance with NPF and specific RSES objectives.

The strong planning rationale for the filling in of the EE zoned lands so that our clients' lands do not remain an isolated and underutilised parcel of land is that the sequential development of EE zoned land will assist in promoting a more compact urban form, in close proximity to existing services and infrastructure within Grange Castle South and Profile Park. This approach would both avoid the uncontrolled expansion of EE zoned lands further west, but is considered to fully align with the aims and objectives of the National Planning Framework which are reiterated through the RSES.

Having regard to the above as well as the specific location of our clients' lands and their option to buy lands, it would seem logical from a land use planning perspective to rezone the subject lands. This would provide for the development of the subject site and cement the future logical synergy between the zoning of lands at the subject site and surrounding lands.

6. Conclusions

It is in the interests of the sustainable development of Grange Castle, that currently zoned RU lands are rezoned to EE where they are located proximate to other EE zoned land, and where they would engender a more compact model of employment land growth in the county.

Our clients request that South Dublin County Council re-examine the RU zoning attached to their strategic landholding in close proximity to existing employment zoned and developed lands in Grange Castle and Profile Park.

The aim of the new Plan should be to promote sustainable employment patterns by locating new EE zoned lands into the key areas of the county that are well serviced with existing infrastructure rather than relying on dispersed locations which are lacking in the necessary infrastructure to support it.

We submit that our clients' lands are located immediately adjacent to Grange Castle in close proximity to a wide range of existing urban services to facilitate development and promote compact, consolidated employment growth in a sequential manner. They also offer a broader range of development opportunities for employers of all scales. Given its location this would also not negate the strategic vision for the wider Grange Castle area. The lands are also one of the few sites within the local area that are not within the ownership of the County Council as outlined in the map on page 7 of this submission. The lands are therefore ideally located and should be zoned in an appropriate manner.

In this regard we request that our clients' lands and their option lands be zoned for Enterprise and Employment (EE) which would constitute an appropriate form of zoning of lands in close proximity to other EE zoned lands to the immediate north and west rather than remaining an isolated RU zoned parcel of land that contains none of the intrinsic characteristics of such land.

We would be obliged if you will acknowledge receipt of this submission in due course and we would be happy to furnish any further information that you may require to deal with this matter.

Yours faithfully,



Anthony Marston (MIPPI, MRTPI)
Marston Planning Consultancy



Connaught House
Number One Burlington Road
Dublin 4
Ireland
D04 CY6

Switchboard +353 1 618 5500
Fax +353 1 668 2991

David Agar
Profile Properties
Profile Park
Grange Castle
Clondalkin

Direct Dial:
Email:

+353 1 6185543
Marie.hunt@cbre.com

23rd March 2022

CBRE ANALYSIS OF CURRENT AVAILABILITY OF 'ENTERPRISE & EMPLOYMENT' ZONED LAND IN SOUTH DUBLIN COUNTY COUNCIL AREA

Following on from the submission of our report '*Observations on Supply & Demand of Industrial & Logistics Accommodation in South Dublin County Council Area*' in September 2021, CBRE have revisited this issue to specifically comment on South Dublin County Council's assertion that there is 624 hectares of land available to facilitate enterprise and employment uses in the local authority area. It is our assertion that the figure is considerably lower than this, meaning that the new South Dublin County Council Development Plan 2022 -2028 underestimates the significant imbalance between supply and demand that actually exists.

CBRE are Ireland's largest full-service property consultancy firm. The industrial agency team at CBRE are actively involved in the sale of land and the sale and leasing of industrial facilities to both owners and occupiers. Our investment team are involved in the sale and acquisition of industrial investment properties. The company's research & consulting team meanwhile compile quantitative and qualitative analysis on the industrial market in Dublin, collating comprehensive statistics on supply, demand, take-up, investment volumes and pricing within the sector to support investor and occupier decision-making. CBRE are therefore well placed to comment authoritatively on supply and demand for industrial & logistics accommodation and land from the perspective of a variety of different types of end users.

In our September 2021 report mentioned above, CBRE produced comprehensive statistics on the volume of industrial & logistics take-up activity and land sales in the South Dublin local authority area over the course of the last decade and concluded that the local authority significantly underestimated the volume of activity witnessed over the period of both of the previous two development plan periods.

In fact, the volume of industrial leasing and sales activity in the period 2010-2015 was 3.5 times higher than that forecasted by the local authority while between 2016 and 2021, the volume of activity was almost three times higher than anticipated (and would arguably have been higher had the Covid-19 pandemic not stymied activity somewhat during 2020 and 2021). Our report clearly demonstrated the extent of undersupply in the location and the extent to which demand (and employment generation) is being diverted to other local authority areas such as Fingal and Kildare. It is difficult therefore to understand the rationale for rezoning so little additional land for 'Enterprise & Employment' use in the new South Dublin County Council development plan, particularly when a sizeable proportion of land with this particular zoning has been specifically identified for 'Regeneration' in the plan, meaning the lands will invariably be developed for higher value uses such as residential and will not be available for employment generation from industrial & logistics occupiers and developers.

While South Dublin County Council contend that there is a total of 624 hectares of land available for development, our research suggests that the true volume of land currently available for new development is a fraction of this quantum. To demonstrate our thesis, we have conducted a thorough analysis, mapped all land currently zoned for 'Enterprise & Employment' in the South Dublin County Council area and by a process of elimination concluded that there is actually limited availability of zoned land for private occupiers and developers. We have specifically excluded lands that are in the ownership of the local authority or the Industrial Development Authority which are reserved exclusively for Foreign Direct Investment (FDI) and lands that are designated for regeneration.

Of the remaining 'Enterprise & Employment' zoned land, we created three distinct categories, namely;

- *Available for Development (Shaded Green on Table 1 & Accompanying Maps)*
- *Under Offer/Reserved (Shaded in Yellow on Table 1 & Accompanying Maps)*
- *Developer/Occupier Controlled & Unavailable (Shaded in Red on Table 1 & Accompanying Maps)*

Table 1 - Zoned Sites in South Dublin Q1 2022

Available For Development	Location	Map Extract	Acres	Hectares
Plot 1	Clutterland, Newcastle, Co. Dublin		36.5 acres	14.77 hectares
Plot 2	Greenogue Business Park, Rathcoole, Co. Dublin		21.7 acres	8.78 hectares
Plot 3	Baldonnell Business Park, Baldonnell, Dublin 22		3 acres	1.21 hectares
Plot 4	Baldonnell Cross Garden Centre, Baldonnell Cross, Dublin 22		6.34 acres	2.56 hectares
Plot 5	Castlebaggot, Newcastle, Co. Dublin		5.72 acres	2.31 hectares

Available For Development	Location	Map Extract	Acres	Hectares
Plot 6	Aylmer Rd, Newcastle, Co. Dublin		14.9 acres	6.03 hectares
			Total - 88.16 acres	Total - 35.68 hectares

Under Offer/Reserved	Location	Map Extract	Acres	Hectares
Plot 1	Castlebaggot, Newcastle, Co. Dublin		141 acres	57.06 hectares
Plot 2	Castlebaggot, Newcastle, Co. Dublin		44.4 acres	17.97 hectares
Plot 3	Baldonnell Road, Newcastle, Co Dublin		9.6 acres	3.88 hectares
Plot 4	Grange Castle West, Dublin 22		47 acres	19.02 hectares
			Total – 242 acres	Total – 97.93 hectares

Developer/Occupier Controlled	Location	Map Extract	Acres	Hectares
Con McCarthy	Greenogue Business Park, Rathcoole, Co. Dublin		11.3 acres	4.57 hectares
Exeter	Aerodrome Business Park, Rathcoole, Co. Dublin		15 acres	6.07 hectares
Mountpark	Baldonnell Business Park, Baldonnell, Dublin 22		38.7 acres	15.66 hectares
Exeter	Brownsbarn, Citywest, Dublin 24		9.7 acres	3.92 hectares

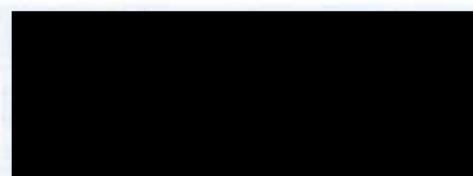
Developer/Occupier Controlled	Location	Map Extract	Acres	Hectares
Con McCarthy	Brownsbarn, Citywest, Dublin 24		3.14 acres	1.27 hectares
Con McCarthy	Kingswood Road, Citywest, Dublin 24		6.5 acres	2.63 hectares
Con McCarthy	Magna Business Park, Citywest, Dublin 24		7.8 acres	3.15 hectares
Rohan Holdings	South West Business Park, Cheeverstown, Dublin 24		17.2 acres	6.96 hectares

Developer/Occupier Controlled	Location	Map Extract	Acres	Hectares
Park Developments	Ballymount Avenue, Ballymount, Dublin 12		17.3 acres	7 hectares
			Total – 126.64 acres	Total – 51.23 hectares

Source: CBRE Research

Our analysis shows that when local authority/IDA owned land and sites designated for regeneration are specifically excluded, of the remaining zoned land, 242 acres or 97.93 hectares is currently under offer/reserved and therefore not available to acquire or develop. A further 126.64 acres or 51.3 hectares is controlled by developers and/or owner occupiers and not available to purchase or develop. This leaves a residual figure of only 88.16 acres or 35.68 hectares that is available for development at this juncture.

35.68 hectares is considerably less than the 624 hectares that South Dublin County Council contend is available. The need to rezone additional lands for 'Enterprise & Employment' use to facilitate growth and employment generation over the lifetime of the forthcoming development plan 2022 - 2028 is therefore clear in our view.



Marie Hunt
Executive Director, CBRE Ireland

