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SUBMISSION

to

**DRAFT KILDARE COUNTY DEVELOPMENT PLAN
2023 – 2029**

regarding lands at

NEWHALL, NAAS, CO. KILDARE

Client: Smullen Transport

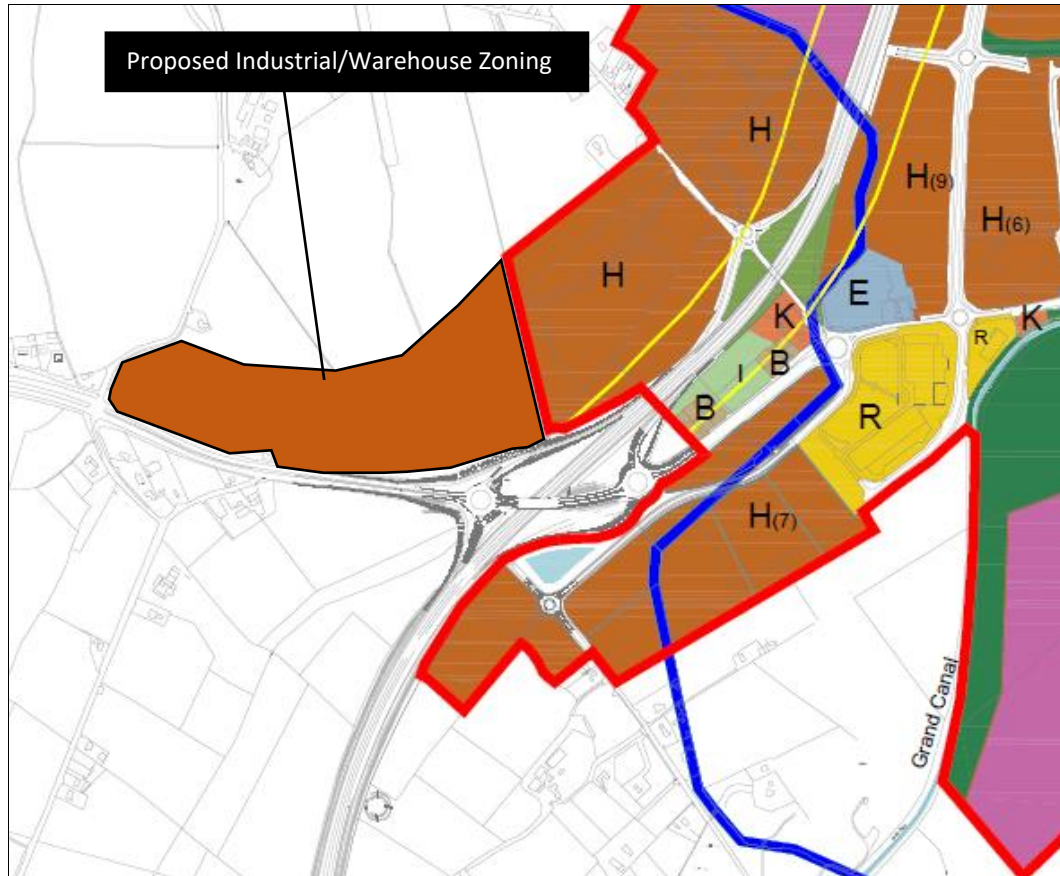
23rd May 2022

EXECUTIVE SUMMARY

Smullen Transport own lands measuring c.22 hectares situated close to Junction 10 in the Townland of Newhall, Naas, Co. Kildare. The lands are outside the development boundary under the Naas LAP 2021-27 and therefore unzoned under the draft Kildare County Development Plan 2023-29.

This submission concludes that the subject lands should be zoned **Industrial/Warehousing** in the interest of proper planning and sustainable development of the area having regard to:

- The need to increase employment opportunities in Naas to counteract locals having to commute further afield.
- The fact that the industrial/warehousing lands near Junction 10 are almost fully occupied.
- The strategic location of the lands to Junction 10 which would be very attractive for companies looking to relocate to Naas.
- The size of the lands and the ability to accommodate a single large-scale industrial development or a multi-unit development, along with appropriate buffers to adjoining lands.
- The fact that the lands are largely surrounded by lands zoned for employment development and would be compatible with same.
- The lack of development constraints.
- The fact that the lands are serviceable and sightlines can be achieved.
- The existing road infrastructure providing access to the site.



Extract from Naas LAP 2021-27 showing proposed zoning objective for the subject lands.

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Smullen Transport** to prepare a submission on their behalf to the Draft Kildare County Development Plan 2023-29 ('KCDP 2023-29')

Smullen Transport own lands measuring approximately **22 hectares** at Newhall, Rathangan Road, Naas, Co. Kildare. These lands are outside the Naas Local Area Plan 2021-27 and remain unzoned, despite being surrounded by employment-based zoning objectives and close to Junction 10 on the M7.

The lands in this area which have been zoned for industrial/warehousing development near Junction 10 are **almost fully occupied leaving little opportunity for a new industrial or warehousing development at this strategic location.**

This submission seeks for the subject lands to be zoned **Industrial/Warehousing** under a separate Environs Plan similar to the approach adopted in respect of employment lands at Ladytown.

Smullen Transport is a family owned and operated logistics business. They are one of the leading transport & logistic companies in the country having worked closely in conjunction with all the major shipping, liner agencies and freight forwarders. They are well known for our expertise in the haulage sector with fully containerised and road freight services along with providing distribution services for a number of Grocery and FMCG companies to Ireland's leading supermarkets; Aldi, Lidl and Dunnes Stores.

They currently **employ 105 people** and their business plan is to continue to grow and develop our warehousing sector. Their **headquarters based in Naas, Co. Kildare** adjacent to the M4, M7 and M9 is in an ideal location to service the entire country; it is at this location, on the subject lands, that they wish to further expand

their warehousing and distribution services providing additional jobs. They are an actively engaged member of the community and sponsor local football teams.

Note. All maps are orientated north. All underlined italics is author's emphasis.

2.0 BACKGROUND

2.1 Location

The subject lands are located on the north side of the M7 motorway, close to the new Junction 10, in the Townland of Newhall.



Fig No.1 Location of subject lands (Source: MyPlan.ie - OSI Licence No.EN 0080915) - note that the new Junction 10 is not shown on this map.

2.2 Description

The subject lands measure approximately **22 hectares** and are greenfield in nature. The site has a road frontage onto the R445 and the L2031.

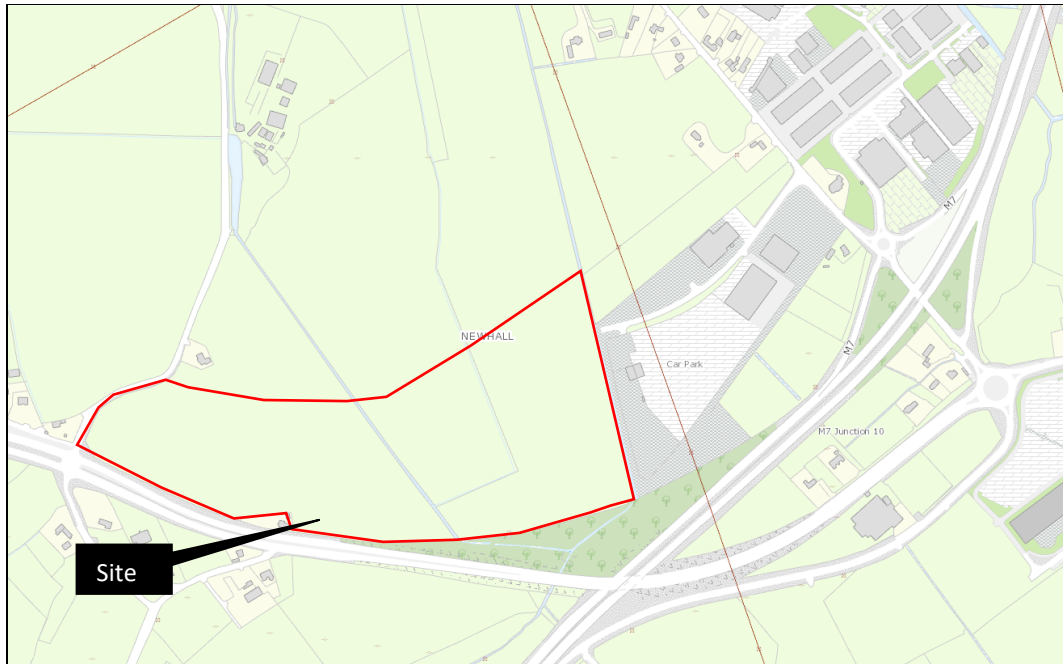


Fig No.2 Site description (Source: MyPlan.ie - OSI Licence No.EN 0080915)

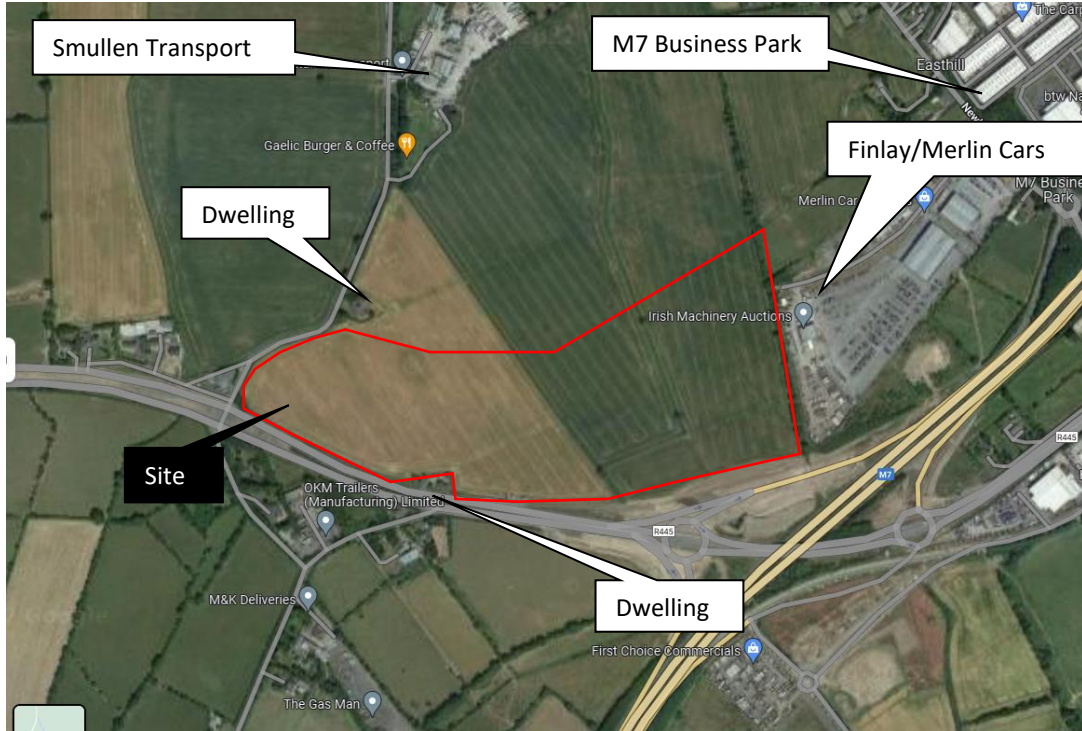


Fig No.3 Aerial Photograph of the subject lands (source: client) with subject site outlined in red.

2.3 Ownership

Smullen Transport own the lands in their entirety - part of folio KE14.

2.4 Adjoining Lands

North	Agricultural lands. Smullen Transport are located further north, with access onto the L2031. There is also a single dwelling to the north.
East	Industrial lands.
South	Agricultural lands and R445 (Newbridge - Naas Road). There is also a single dwelling to the south.
West	Public Road (to Sallins - L2031).

2.5 Built or Natural Heritage

There is no known built or natural heritage associated with the subject site or in the immediate vicinity based on a review of the historic environment viewer and myplan.ie.

2.6 Flood Risk

A review of floodinfo.ie did not reveal any flood risk issues associated with the subject lands.

2.7 General Area

The general area is characterised by industrial land uses, with the M7 Business Park located to the north-east and Finlay Ford/Merlin Cars/Ganly Craige to the east all availing of the proximity to Junction 10.

The M7 Business Park is understood to be approximately 90% occupied with approximately 45 large and medium sized units in operation. The industrial lands to the south are almost fully complete and occupied.

3.0 PLANNING HISTORY

3.1 Introduction

This section involves a review of the planning history for the site and surrounding area in order to establish if there are any relevant planning permissions which are material for the purposes of this submission.

3.2 Subject Site

The following planning history for the subject lands is recorded on the Kildare Co. Co. planning enquiry system.

FILE NUMBER 06/707

SURNAME Crylock Developments Ltd

YEAR 2006

DECISION GRANT

DESCRIPTION A **business park/industrial estate** comprising of approx.11 no. sites for future industrial development: construction of 1 no. manufacturing unit (approx 2,045 sq m) on one of these sites: remaining sites to the subject of future planning permission.

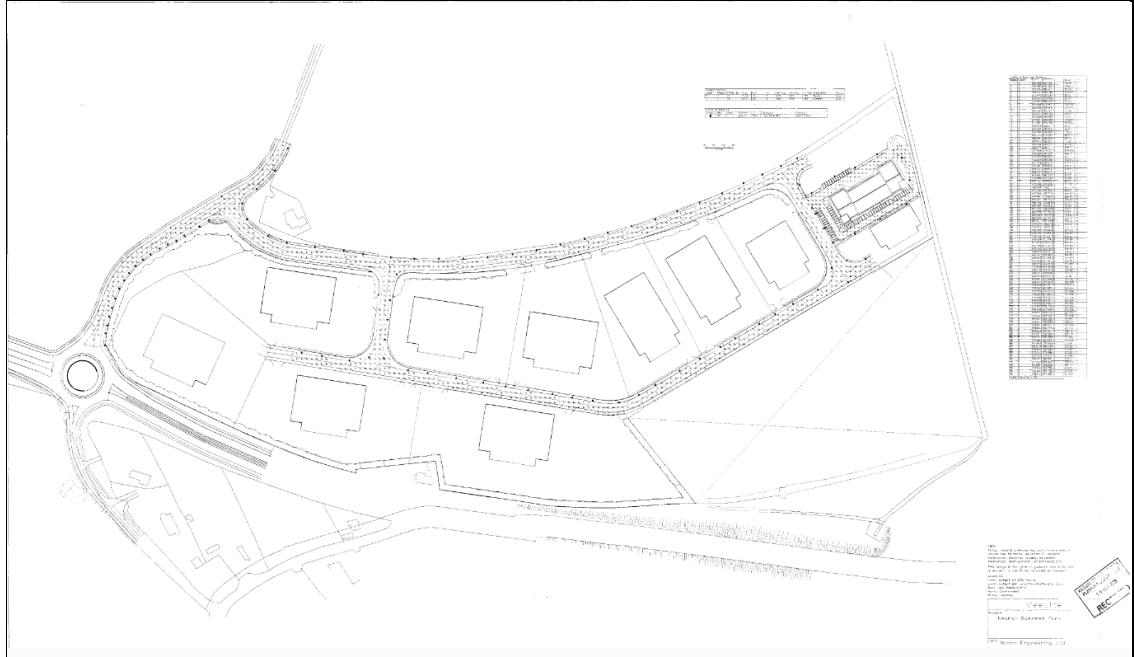


Fig No.4 Layout of business park/industrial estate submitted with the application at further information stage.

FILE NUMBER 12/106

SURNAME Crylock Developments Ltd

YEAR 2012

DECISION GRANT

DESCRIPTION EXT OF DUR FOR 06/707 - A business park/industrial estate comprising of approx.11 no. sites for future industrial development: construction of 1 no. manufacturing unit (approx. 2,045 sq m) on one of these sites: remaining sites to the subject of future planning permission

This permission was not implemented and withered.

FILE No. 21/1739

Smullen Transport Ltd have a live application with the Council for retention of dock levellers, truck wash and associated site works. B. Retention of 9.5m² of floor area to the northern corner of the existing premises. C. The construction of an

ancillary building of 259.9m², for use as a vehicle maintenance building adjoining the existing storage unit at Newhall Business Park, Naas, Co. Kildare

3.3 Adjoining Lands to South

Two planning applications have recently been granted for **warehousing** development on the lands to the north-east of the subject site.

KCC Planning Ref. 20/714

Permission granted to Liam Queally on 24/02/2021 for Freezer Warehouse.

KCC Planning Ref.20/715

Permission granted to Ballymooney Foods Ltd on 24/02/2021 for Freezer Warehouse.

The Planner's Report notes the site is not in a flood zone, there are no built or natural heritage constraints and the principle of warehouse development on the lands *"is clearly considered acceptable"*.



Fig No.5 Location of two new permissions for warehousing adjoining the subject lands.

4.0 PLANNING CONTEXT

4.1 National Planning Framework 2040

The NPF strategy seeks to “*make better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport*” (s.2.6).

The NPF notes that in the wider Mid-East Region, “*the rapid growth experienced by many towns in recent decades was mainly driven by housing, rather than jobs centred development. An integrated approach to the development of these and similar towns is a priority, but playing to local strengths and securing employment opportunities to drive self-sustaining, rather than mainly housing-led development*” (s.3.2).

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

4.2 Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2031

At its core, the EMRA RSES sets out a settlement and economic growth strategy that seeks to ensure that the needs of the Regions' citizens such as access to employment opportunities and services, ease of travel and overall well-being are met.

Naas town is identified as a Key Town in the Hinterland area. Key Towns shall *“act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers”*.

4.3 Kildare Local Economic and Community Plan (LECP) 2016-2021

The LECP sets out, for a six-year period, the objectives and actions needed to promote and support the economic development and the local and community development of the county, both by the Council itself directly and in partnership with other economic and community development stakeholders.

It notes that the All-Island Research Observatory (AIRO) in Maynooth University, identified that over 40% of the total workforce living in Kildare work outside the county, mostly in Dublin (73% of all commuters).

4.4 Kildare County Development Plan 2017 – 2023

4.4.1 Economic Development (Ch.5)

The aim of the CDP in terms of Economic Development is *“To provide for the future well-being of the residents of the county and the region by facilitating economic development; to promote the growth of employment opportunities in all sectors including tourism in accordance with the principles of sustainable development; to achieve a reduction in the unsustainable levels of commuting”*

from the county; to provide a greater focus on community building and improving quality of life".

4.4.2 Policies: Economic Development Strategy

It is the policy of the Council to:

ECD 1 *Facilitate and support the growth of the economy in Kildare and the Greater Dublin Area in a sustainable manner, and in accordance with the RPGs economic strategy (or the forthcoming Regional Spatial and Economic Strategy).*

ECD 2 *Support and facilitate the economic development of the county in accordance with the economic development strategy of the County Development Plan, across a range of sectors. There will be a general presumption against development that would prejudice the achievement of the Economic Development Strategy.*

ECD 10 *Co-operate with local and national development agencies to maximise job creation opportunities and to engage with existing and future large-scale employers in order to maximise job opportunities in the county.*

4.5 Naas LAP 2021-27

4.5.1 Zoning Objective

The lands which are the subject of this submission are outside the development plan boundary and are unzoned under the Naas LAP.

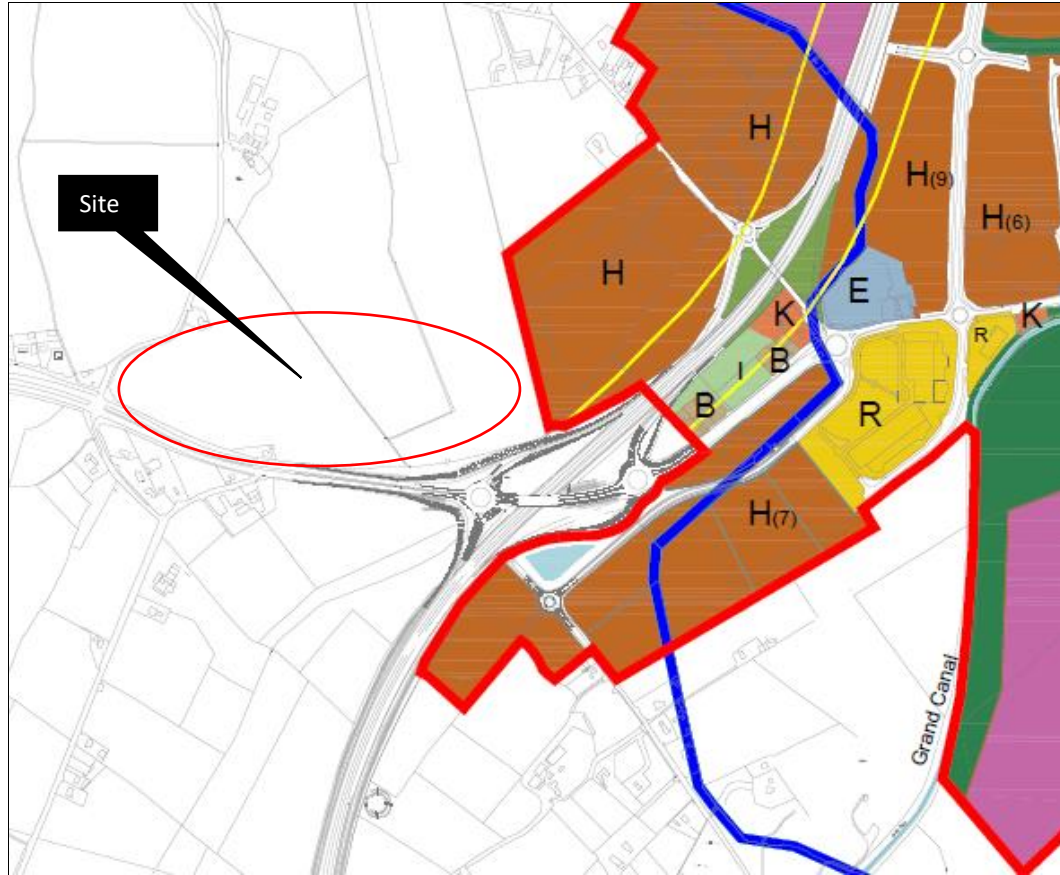


Fig No.6 Extract from Naas LAP 2021-27 showing indicative location of subject lands and recently permitted warehouses.

It is also important to highlight that the H zoned lands to the east of the site are nearing capacity and therefore there is a need to ensure alternative zoned lands are provided in the area.

4.5.2 Relevant Extracts from the LAP

Section 5.2 notes that *"in order to make the town more self-sufficient and to address the economic and social impact of commuting, it is critical that the number of jobs is increased"*.

Section 5.3 refers to the 'Naas Economic Development Strategy' and states that *"The strategic aim for the Plan is to protect existing employment in the town and to create new employment opportunities for Naas to fulfil its role as a 'Key Town' in the region and as the county town"*.

5.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

5.1 Zoning

Under the draft Kildare County Development Plan 2023-29 the subject lands are not zoned and therefore are deemed to be primarily agricultural in terms of any assessment under a future planning application during the lifetime of the Plan.

Unlike the previous Kildare CDP there is no provision for any zoning in the Environs of Naas town i.e. outside the Naas LAP lands.

6.0 SUBMISSION

6.1 Introduction

The national and regional planning guidelines, the Kildare County Development Plan and the current Naas LAP all seek to **increase the amount of employment opportunities** in Naas so as to counteract the significant amount of local people who have to work in Dublin or elsewhere outside the county.

Much of the lands zoned for Industrial/Warehousing development in Naas reflects industrial parks that are already fully occupied or **nearing full occupation**. This is particularly evident for the industrial/warehousing lands in the vicinity of Junction 10.

The subject lands are considered ideally suited to be zoned '**H** **Industrial & Warehousing**':

- The lands are strategically located close to the (existing and new) Junction 10 with an established road infrastructure in situ.
- The lands zoned for industrial/warehousing in the vicinity are almost at full occupation leaving an absence of lands to accommodate new industry or warehousing opportunities at this strategic location.
- The lands are largely surrounded by employment zoning objectives and the zoning of the subject lands for Industry/Warehousing would be compatible with same.
- The lands were previously the subject of a planning permission for an industrial/business park demonstrating that the principle of this type of use was previously considered suitable and there are no constraints associated with the lands.
- The subject lands have the capacity in terms of size to accommodate multiple units which would generate significant employment opportunities.
- An industrial/warehousing zoning objective would be compatible with industrial land uses in the general vicinity.
- The subject lands are large enough to accommodate appropriate buffer areas in respect of the 2 no. adjoining residential dwellings.
- There are no known constraints associated with the development of the subject lands.
- The lands have significant road frontage for access.

We therefore submit that the subject lands should be zoned Industry and Warehousing.

We note that under the draft Kildare CDP 2023-29 Ladytown has its own Environs Plan and its own zoning matrix. We submit that the exact same approach could be adopted in respect of the subject lands at Newhall. Given the potential employment generation that could be yielded for these lands we consider that it deserves special attention.

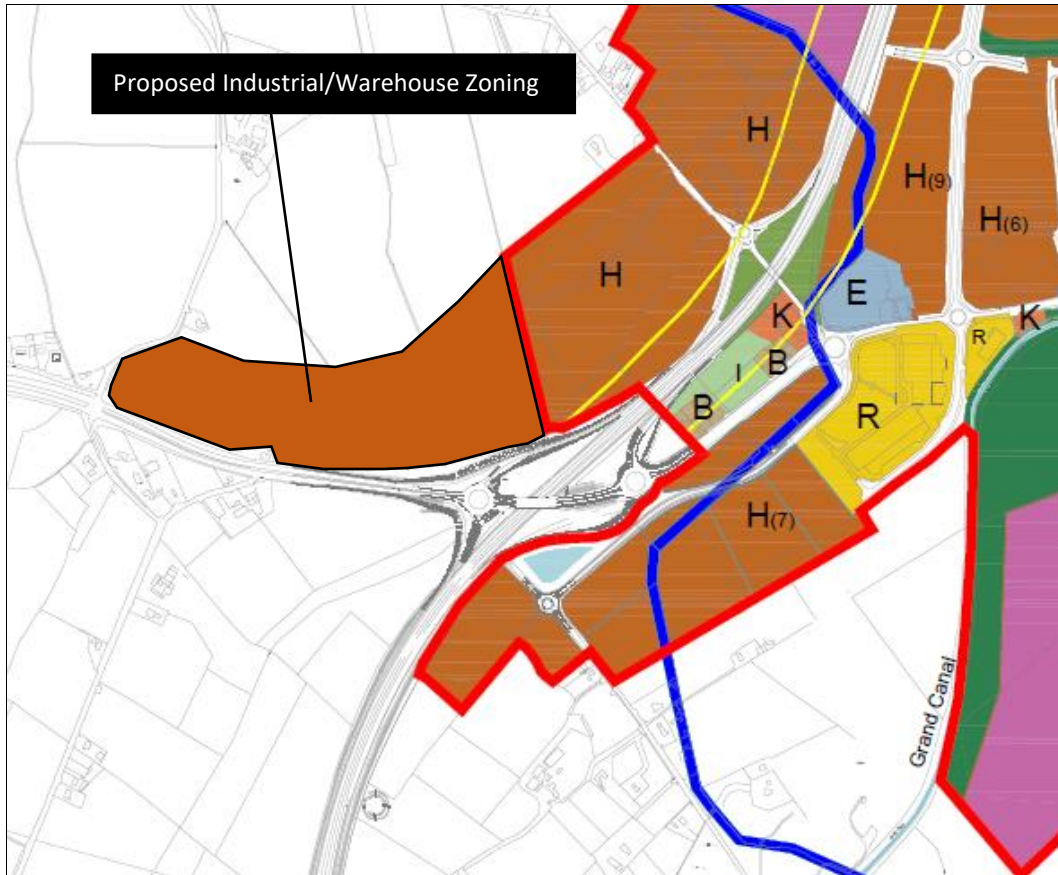


Fig No.7 Extract from Naas LAP 2021-27 showing proposed zoning objective for the subject lands.

7.0 CONCLUSION

Smullen Transport own lands measuring c.17 hectares situated close to Junction 10 in the Townland of Newhall, Naas, Co. Kildare. The lands are shown immediately outside the development boundary under the Naas LAP 2021-27 and are therefore unzoned in the draft Kildare CDP 2023-29.

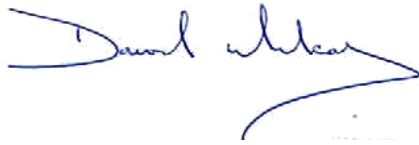
This submission concludes that the subject lands should be zoned **Industrial/Warehousing** in the interest of proper planning and sustainable development of the area having regard to:

- The need to increase employment opportunities in Naas to counteract locals having to commute.
- The fact that the industrial/warehousing lands near Junction 10 are almost fully occupied.
- The strategic location of the lands to Junction 10 which would be very attractive for companies looking to relocate to Naas.
- The size of the lands and the ability to accommodate a multi-unit development, along with appropriate buffers to adjoining lands.
- The lack of development constraints associated with the lands.
- The high-quality existing road infrastructure providing access to the site.

There is an **established precedent** for zoning similar employment lands at Ladytown under the category of Environs and we submit that the same approach should be adopted in respect of the subject lands given the employment potential involved.

In view of the above, it is our professional opinion the zoning of the subject lands for industrial/warehousing development would accord with the proper planning and sustainable development of the area.

Signed:

A handwritten signature in blue ink, appearing to read "David Mulcahy", with a long, sweeping underline that extends to the right.

David Mulcahy

David Mulcahy Planning Consultants Ltd

CHARTERED PLANNING CONSULTANTS