South Dublin County Development Plan 2022-2028

Proposed Variation No. 2
NPF Implementation Housing Growth Requirements and Compact Settlement Guidelines

Chief Executive's Report
May 2026

SDCC
Comhairle Contae Átha Cliath Theas
South Dublin County Council

South Dublin 2022-2028
County Development Plan

List of Acronyms

AA – Appropriate Assessment

ABP – An Bord Pleanála

ABTA – Area-Based Transport Assessment

ACA – Architectural Conservation Area

ACP – An Coimisiún Pleanála

AEP - Annual Exceedance Probability (flooding)

BOLAP – Ballycullen-Oldcourt Local Area Plan

CDP – County Development Plan

CE – Chief Executive

CEMP – Construction Environmental Management Plan

CFRAM - Catchment Flood Risk Assessment and Management

CIEEM - Chartered Institute of Ecology and Environmental Management

DAA – Dublin Airport Authority

DHLGH – Department of Housing, Local Government and Heritage

DMURS – Design Manual for Urban Roads and Streets

DoEHLG - Department of the Environment, Heritage and Local Government

DoEY – Department of Education and Youth

EASA - European Union Aviation Safety Agency

EE – Employment/Enterprise Zoning

EIA/EcIA – Ecological Impact Assessment

EPA - Environmental Protection Agency

ESB – Electricity Supply Board

FRA – Flood Risk Assessment

GDA – Greater Dublin Area

GI – Green Infrastructure

GIS – Geographic Information System

GSF – Green Space Factor

HA-DV – High Amenity Dodder Valley

HA-LV - High Amenity Liffey Valley

HEFS - High-End Future Scenario (flooding)

HSE – Health Service Executive

HSM – Housing Supply Measure

IAA – Irish Aviation Authority

ICAO - International Civil Aviation Organization

LAP – Local Area Plan

LCA – Landscape Character Assessment

LPF – Local Planning Framework

LRD – Large-scale Residential Development)

LRT – Light Rail Transit

MASP - Dublin Metropolitan Area Strategic Plan

NDP – National Development Plan

NPF – National Planning Framework

NIR – Natura Impact Report

NTA – National Transport Authority

NPO – National Policy Objective

NPWS - National Parks and Wildlife Service

NSOs – National Strategic Outcomes

OS - Ordnance Survey or Open Space

OPR – Office of the Planning Regulator

OPW – Office of Public Works

PSZs – Public Safety Zones

RES – Existing Residential

RES-N – New Residential

RNAV – Area Navigation

RPS – Protected Structure

RSES – Regional Spatial and Economic Strategy

RU – Rural

SAAO - Special Amenity Area Order

SCA – Settlement Capacity Audit

SDCC – South Dublin County Council

SDZ – Strategic Development Zone

SEA – Strategic Environmental Assessment

SEO – Strategic Environmental Objective

SFRA – Strategic Flood Risk Assessment

SLO – Specific Local Objective

SRR – Strategic Residential Reserve

SuDS – Sustainable urban Drainage Systems

TAP – Traveller Accommodation Programme

TC – Town Centre

TII – Transport Infrastructure Ireland

TOD – Transit-Oriented Development

TTA - Traffic and Transport Assessments

VC – Village Centre

UE – Úisce Éireann

WFD – Water Framework Directive

WWTP – Wastewater Treatment Plant

In accordance with section 58 (11) of the Planning and Development Act, 2024 (as amended), the following Chief Executive's Report sets out a summary of all submissions / observations made with respect to the proposed variation No.2 of the SDCC County Development Plan 2022-2028. The Report also includes a list of persons or bodies who made submissions or observations. The Report has been complied in conformity with the requirements Planning and Development Act, 2024 (as amended) and in accordance with SDCC Corporate Policies.

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Section 1 - Introduction

1.1 Overview

This Chief Executive's report relates to the issues raised in submissions and observations received from members of the public, prescribed authorities and other stakeholders following the publication of the Proposed Variation No. 2 of the South Dublin County Development Plan 2022 – 2028. The process of preparing a Variation to the County Development Plan 2022-2028 has been undertaken under Section 58 of the Planning and Development Act 2024 (as amended).

Proposed Variation number 2 to the South Dublin County Development Plan 2022–2028 is to respond to the recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of associated Section 28 Guidelines and other guidelines published since the adoption of the County Development Plan in June 2022, primarily:

- NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities, July 2025; and
- Sustainable Residential Development and Compact Settlement Guidelines, 2024.

In addressing the new housing growth requirements and other changes to National planning policy, the proposed variation proposes to rezone land with associated changes to the written statement, maps and appendices of the South Dublin County Development Plan 2022-2028 to address specific immediate updates that are needed to implement national policy.

Locations for Future Strategic Long-Term Development Areas are also identified to facilitate the commencement of preparatory work to inform future rezoning of the identified lands and plan-led development. This will facilitate the housing growth requirements of the County beyond the current Development Plan period.

Changes to, and/or additions of, policies, objectives and measures to support and facilitate the activation of existing zoned lands for residential use are also proposed.

Other related amendments are proposed to ensure consistency with updated national planning policy, Section 28 Ministerial Guidelines and existing policy objectives of the South Dublin County Development Plan 2022-2028.

The proposed variation is also responding to Pillar 1: Activating Supply as set out in the Government Action Plan on Housing Supply and Targeting Homelessness "Delivering Homes, Building Communities, 2025 – 2030" (November 2025). The zoning of sufficient land is seen as a key enabler to delivery.

This proposed variation has taken due account of the relevant National Planning Policy Guidance, noting that under section 27 of the Planning and Development Act 2024, section 28 guidelines under the 2000 Act are deemed to be National Planning Policy Guidance until a National Planning Statement is issued.

The proposed variation is accompanied by the following environmental assessments:

- A Strategic Environmental Assessment (SEA) screening determination and SEA Environmental Report pursuant to the European Strategic Environmental Assessment Directive (2001/42/EC) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended).
- An Appropriate Assessment (AA) screening determination and Appropriate Assessment Stage 2 Report (Natura Impact Report) – pursuant to Article 6(3) of the European Habitats Directive (92/43/EEC);
- A Strategic Flood Risk Assessment, in accordance with the relevant Section 28 Guidelines

And the following supporting documentation:

- 'Proposed Variation No. 2', including Amendment Ref Nos. 24-64 to the written statement and relevant appendices of the County Development Plan
- Proposed Variation 2 to County Development Plan 2022-2028 Book of Maps, including Amendment Ref Nos. 1-23
- The Proposed Variation is informed by a Settlement Capacity Audit, 2025 (this is not part of the Proposed Variation but included for information purposes)

1.2 Public Consultation

Non-Statutory Consultation

In response to the Guidelines, South Dublin County Council (SDCC) invited the public, landowners, homebuilders and other interested stakeholders to put forward suggestions for lands within the County that may be suitable for residential uses to contribute to meeting the revised housing requirements. In this regard, a non-statutory consultation was held by South Dublin County Council over the period 23rd October to Thursday, 13th November 2025.

SDCC sought proposals for lands or sites within its administrative area (with supporting information) that:

- Contribute to the achievement of Compact Growth.
- Are within the built-up footprint of Dublin City and Suburbs and other existing towns.
- Are in areas that contribute to Transport-Oriented Development (TOD) by virtue of good availability and proximity to high-capacity public transport.
- Are serviced or serviceable within the next five-year period.
- Are in areas with good social infrastructure and capacity in schools and community facilities or that can provide for the development of necessary social infrastructure.
- Support the development of infill housing, housing on brownfield land and/or address vacancy and dereliction.
- Do not have significant challenges or impediments to the development of housing e.g. legal, environmental, topographical or servicing.

Submissions were made online through the Council's consultation portal or by post. In total 43 submissions were received on this non-statutory consultation process. All proposed lands received were assessed in line with the methodology set out in the Report to Councillors (October 2025).

Statutory consultation

In accordance with Section 58 (7) and (8) of the Planning and Development Act 2024 (as amended), the Proposed Variation No. 2 and the Draft Environmental Reports were put on public display between 13th February 2026 and 13th March 2026. Public notices notifying members of the public that the Proposed Variation was on public display were published in the Irish Times (English) and in the Tallaght Echo (in English and Irish) and on the Council's website. The Variation, supporting documentation and environmental assessments were published on the Council's consultation portal inviting written observations and submissions.

Public consultation on the Variation was also promoted through the Council's social media.

The Proposed Variation was made available to view at Lucan Library and County Hall, Tallaght during normal opening hours (excluding public holidays).

Two public information drop-in sessions were held during which Council staff were available to answer questions at:

- County Hall, Tallaght, D24 A3XC, Wednesday 25th February 2026, 14.00 – 20.00
- Lucan Library, Lucan Shopping Centre, Newcastle Road, Lucan, K78 V295 , Wednesday 04th March 2026, 14.00 – 20.00

The drop-in session in Lucan in particular was very well attended with a constant stream of people attending over the six-hour period.

2,678 submissions were received in total on the Proposed Variation within the consultation period.

In accordance with Section 58 (10) of the Planning and Development Act 2024, as amended, written submissions and observations were published on the website of the authority within 10 working days of their receipt.

Statutory Bodies

Under Section 58 (7) of the Planning and Development Act 2024 (as amended) the Planning Authority is required to send notice of the proposed variation to the prescribed authorities listed within that section.

Responses were received from statutory bodies and have been responded to by the Chief Executive as set out below in this report.

1.3 Purpose of the Chief Executive's Report and Process

This report is submitted to the Members of South Dublin County Council for their consideration as part of the process for the preparation of Variation No.2 for the County Development Plan 2022-2028.

This Chief Executive's Report forms part of the statutory procedure for the preparation of the Variation, as required by Section 58 (11) of the Planning and Development Act, 2024 (as amended) and as required by the Act:

- Lists the persons who made submissions or observations.
- Summarises the recommendations and submissions made by the Office of the Planning Regulator (OPR) and the submission made by the National Transport Authority. [It is noted that no submission was made by the regional assembly EMRA, or by the Minister].
- Summarises the submissions made by any other persons and where considered appropriate grouping and summarising the issues raised in different submissions on a thematic basis.
- Contains the Chief Executive's response to the issues raised, and as required by section 58(c)(iii) taking account of the proper planning and sustainable development of the area, the statutory obligations of the planning authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- Sets out the recommendations of the chief executive as to how any recommendations made by the Office of the Planning Regulator in their submission should be dealt with (noting that there was no submission to the Variation from the Minister for the chief executive to make recommendation on); and

- Where required, includes the assessment of the chief executive of the proposed variation for the purposes of strategic environmental assessment or appropriate assessment, taking into account the submissions received.

  In accordance with Section 58(12) of the Planning and Development Act 2024 (as amended) the Elected Members consider the Proposed Variation and the report of the Chief Executive. The consideration of the proposed variation and the CE Report is to be completed within 6 weeks from the date of its submission to the Elected Members.

  Following this, if it appears to the Elected Members that the proposed variation should be made, it is made by resolution.

  However, if it appears that a modified version of the proposed variation should be made, this also is done by resolution. Where the modified version constitutes a material alteration of the proposed variation the variation shall be deemed not to have been made and the planning authority shall publish notice of the material alterations and put them out for public consultation for not less than 4 weeks. Prior to public consultation, determinations are required for any material alterations as to the need for a strategic environmental assessment or an appropriate assessment.

  A further CE Report is submitted to the Members for their consideration on the submissions received on the material amendments. The Members consider this and the modifications and at this stage they either make the variation as originally proposed by the planning authority or they make the variation with the material amendments or refuse to make the variation.

  If in making the proposed variation or a modified version of the proposed variation, the members of the authority do not comply with any recommendation made by the Minister or Office of the Planning Regulator, they must, as soon as practicable following the making of the variation, inform the Minister, or the Office of the Planning Regulator, as the case may be, by notice in writing. The notice must contain a statement of the reasons for the decision not to comply with the recommendation concerned.

  Section 15 of Climate Action and Low Carbon Development Act 2015 includes duties of certain bodies. It is stated that a relevant body shall, in so far as practicable, perform its functions in a manner consistent with— (a) the most recent approved national mitigation plan, (b) the most recent approved national adaptation framework and approved sectoral adaptation plans, (c) the furtherance of the national transition objective, and (d) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State. These relevant bodies include local authorities.

1.4 Structure of the Chief Executive's Report

This report is set out as follows:

Section 1 – Introduction

1.1 Overview

1.2 Public Consultation Process

1.3 Purpose of the Chief Executive's Report and Process

1.4 Structure of the Chief Executive's Report

Section 2 – Summary of the Submissions from the Office of the Planning Regulator (OPR) and the National Transport Authority (NTA) and the Chief Executive's Response and Recommendation

2.1 Legislative Context

2.2 Summary of the submission and recommendation made by the Office of the Planning Regulator

2.2.1 the response of the Chief Executive to the issues raised by the OPR

2.2.2 Recommendation of the Chief Executive as to how the recommendation made by the Office of the Planning Regulator should be dealt with.

2.3 Summary of the submission made by the National Roads Authority, including the response and recommendation of the Chief Executive to the issues raised.

Section 3 – Summary of the Issues Raised by Other Persons and the Response and Recommendations of the Chief Executive.

This section orders the summaries, CE response and recommendations as follows:

3.1 Amendments relating to Lands within the Variation

3.2 Amendments relating to the Written Statement

3.3 Submission Proposals for Lands Outside the Variation

3.4 Miscellaneous or Other Matter Raised in Submissions

Section 4

List of Submissions

1.5 Navigating the Chief Executive's Report

In this Chief Executive's Report submissions have generally been grouped and summarised by theme under each amendment (where applicable) followed by the Chief Executive's response and recommendation. Some submissions raised lands outside the Variation, these are dealt with after the amendments. The ordering is as set out above under section 3.

Access to each submission in full is available through the relevant hyperlinks in this report where they relate to each summary section and through the list of submissions included as Section 4. Hyperlinked text is identifiable by an underline and will be either blue or black text. Owing to the volume of submissions, they are listed under each proposed variation or theme heading by way of 3 columns. This is then followed by any relevant maps to identify the lands concerned and by the summary of the relevant submissions, CE response and recommendation to the issues raised.

1.6 How to Read the Chief Executive's Recommendations

Variation No. 2 as published seeks to amend the South Dublin County Development Plan 2022-2028. Where changes were proposed as part of the Variation to the Written Statement, the existing text of the Plan is shown in black, proposed deletions in ~~red strikethrough~~ and proposed amendments or new text in green.

In response to submissions received, the Chief Executive may recommend changes to the text of the amendments in the Proposed Variation, the provision of additional amendments to the County Development Plan or changes to the documents accompanying the Proposed Variation No. 2. The recommended deletions to the Written Statement amendments in Variation No. 2, are shown in ~~strikethrough blue~~. Any recommended new text in Variation No. 2, the Plan and the accompanying documents in this Chief Executive's Report are shown in purple.

Section 2 – Summary of the Submissions from the Office of the Planning Regulator (OPR) and the National Transport Authority (NTA) and the Chief Executive's Response and Recommendations

2.1 Legislative Context

Section 58 (11) of the Planning and Development Act 2024 (as amended) requires the Chief Executive's Report to make a summary of the recommendations and submissions made by the Minister and by the Office of the Planning Regulator (OPR), and the submissions of the National Transport Authority (NTA) and the relevant Regional Authority outlining the recommendations of the Chief Executive in response to the issues raised.

As required under section 58(11)(c) of the Act, the Chief Executive's response takes account of the proper planning and sustainable development of the area, the statutory obligations of the planning authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

In view of these requirements, this part of the CE Report gives a response and recommendation to the issues raised by the OPR and the NTA in their submissions and sets out the recommendations of the Chief Executive.

In the interest of clarity, no submission was received from the regional authority or the Minister.

2.2 Summary of the submission and recommendation made by the Office of the Planning Regulator and the response of the Chief Executive to the issues raised

SD-C401-CDP25-1375 – Office of the Planning Regulator

The functions of the Office of the Planning Regulator (OPR, the Office) are set out in the submission noting that a key function is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The OPR submission on the Variation is pursuant to Part 3 of the Planning and Development Act 2024 and its functions under section 546.

It is noted that Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The OPR sets out the areas within the County Development Plan that will be subject to change as part of the proposed Variation and recognises the considerable work undertaken by the Planning Authority in implementing the Housing Growth Guidelines and in the assessment of the capacity of currently zoned lands as set out in the Settlement Capacity Audit (SCA).

The Office notes and welcomes the amendments proposed to the core strategy table (Table 11), which provide a robust and coherent framework for accommodating the county's revised housing growth requirements.

The Office strongly welcomes the proposal to zone additional lands for residential use, identified as amendments no.1 to no.16 of the proposed Variation, which are vital to enable the delivery of housing within the current plan period, consistent with Policy and Objective 1 and 2 of the Housing Growth Guidelines.

The Office considers that the proposed Variation supports the recently published housing plan Delivering Homes, Building Communities 2025-2030, which emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

The Office highlights the importance of the Planning Authority's continued engagement with relevant infrastructure agencies to ensure that in the short to medium term the delivery of critical infrastructure such as Dart+ Southwest is progressed in coordination with housing delivery.

The Office also welcomes the identification of long-term strategic and sustainable development locations to provide for housing needs beyond the lifetime of the current County Development Plan, and highlights the need to ensure that new

infrastructure identified and required is delivered in tandem with new residential development, aligning within the lead-in time for infrastructure delivery and the provisions of NPO 97 of the National Planning Framework First Revision (2025) (NPF) related to Transit-Oriented Development.

It is noted that the submission sets out a strategic level input in finalising the proposed Variation. In the context of the OPRs overview, they set out one recommendation under the theme of 'Implementation of the housing growth requirements.

Implementation of the Housing Growth Requirements

The Office fully supports the identification of additional new residential zoned lands, through amendments 1 to 16 of the proposed Variation, in meeting the requirements of the Housing Growth Guidelines, based on the evidence set out in the proposed Variation and the accompanying SCA.

As such, the Office considers that the proposed Variation should continue to be progressed and adopted by the Planning Authority to ensure the objectives of the Housing Growth Guidelines are incorporated within the County Development Plan, in accordance with Policy and Objective 3 of the Housing Growth Guidelines.

Recommendation 1 - Implementation of the Housing Growth Requirements

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:

• NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;

• NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and

• the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans,

the Planning Authority is recommended to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation.

2.2.1 CE Response

The Planning Authority welcomes the submission from the OPR including their recognition of the work undertaken by the Planning Authority to implement the Housing Growth Guidelines and their welcoming of the amendments proposed to the core strategy table (Table 11) and the identified amendments no. 1 to no. 16 of the proposed Variation. It is noted that the OPR considers that the proposed Variation supports the housing plan Delivering Homes, Building Communities 2025-2030.

The welcoming by the Office of the identification of long-term strategic and sustainable development locations to provide for housing needs beyond the lifetime of the current County Development Plan is acknowledged. The Planning Authority has identified these lands and associated objective for the reasons outlined in the OPR submission, that is, to ensure sufficient lead-in time to engage with relevant stakeholders, including infrastructure providers, so that future development on the lands can be delivered in tandem with infrastructure.

The need to ensure continued engagement with relevant infrastructure providers to ensure that in the short to medium term the delivery of critical infrastructure such as Dart+ Southwest is progressed in coordination with housing delivery is acknowledged. The Planning Authority will continue to engage with Iarnroid Éireann, Uisce Éireann, the NTA, TII and other relevant infrastructure providers in this regard and will work within its power to facilitate the infrastructure needs for housing and other land uses.

The OPR has made a single recommendation which is to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation. As stated in the beginning of the OPRs submission, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

2.2.2 Recommendation of the chief executive as to how any recommendations made by the Office of the Planning Regulator should be dealt with.

The OPR has made one recommendation which is to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation.

CE Recommendation: Progress to make the Variation including amendments no. 1 to no. 16.

2.3 Summary of the submission made by the National Roads Authority, including the response and recommendation of the Chief Executive to the issues raised.

SD-C401-CDP25-1513 – National Transport Authority

Summary	Response and Recommendation
The NTA indicates that the Greater Dublin Area Transport Strategy (GDATS) is the relevant transport strategy for the purpose of section 48 (8) of the Planning and Development Act 2024 and the requirement that a planning authority takes due account of any relevant transport strategy of the NTA. The submission is supportive of a plan-led, evidence based approach and states that having carried out a review of the zonings put forward by SDCC, the NTA generally welcomes the proposals but has made recommendations to maximise the integration of transport planning and land use planning in a manner that would prioritise development in the most accessible locations in the County.	The statutory role of the NTA under Section 42 of the Planning and Development Act 2024 and the requirement for Development Plans to take due account of the *Greater Dublin Area Transport Strategy 2022–2042* (GDATS) is acknowledged**.** In preparing the proposed Variation the Planning Authority has taken account of the Strategy. Criteria for transport accessibility, based on distances set out in the Sustainable Residential Development and Compact Settlement section 28 guidelines, was included in the assessment of lands as part of an evidence-based approach to the proposed Variation. The Planning Authority acknowledges the general welcoming of the approach and zoning proposals, noting that the NTA has made some recommendations to prioritise development in locations which the NTA identify as the most accessible in the County. The Planning Authority agrees with the NTA on the need for compact growth and transport-oriented development (TOD). This is a key objective of the South Dublin County Development Plan 2022-2028, recognising the benefits it can bring to citizens through connected neighbourhoods and the greater facilitation of access to services in line with the 10-minute settlement concept and its role in promoting improved efficiencies from existing and planned infrastructure. In this regard, SDCC welcomes the identification of key infrastructure projects in the Transport Strategy which will be critical in supporting both existing and proposed development within the county. These projects are identified as: • DART+ Southwest

It is stated that by emphasising consolidated development and compact growth in the first instance, including through Transport Oriented Development (TOD), in line with the Avoid – Shift – Improve approach, sustainable travel patterns and healthy urban environments would be promoted and facilitated. Such an approach may also reduce the need for additional infrastructure provision, thereby reducing the timescales involved for housing delivery. *Delivery of Transport Infrastructure* The major schemes relevant to SDCC in the Transport Strategy are identified as: – Dart+ Southwest; – Luas Lucan; and – BusConnects Core Bus Corridors (CBCs) – Tallaght / Clondalkin, Liffey Valley, Lucan and Templeogue / Rathfarnham	• BusConnects Core Bus Corridors (Tallaght/Clondalkin, Liffey Valley, Lucan, Templeogue/Rathfarnham) • Luas Lucan (future scheme) • Countywide Active Travel investment The Council strongly supports the delivery of these projects and recognises their transformative role in addressing long-term mobility, climate resilience and sustainable settlement patterns in the County. It is widely recognised that South Dublin is playing a major role in delivering housing and growth in the country and that a significant percentage of this is planned as TOD, including, but not limited to, the two large-scale SDZs at Clonburris and Adamstown, and the longer-term City Edge lands. The statutory approval of the Dart+ South West Railway Order in November 2024 and the ongoing CPO process to realise its delivery is an important step in progressing a significantly improved service on this line to serve the existing and new residents. Aligned with improved bus services for the wider area and ongoing active travel schemes this will make for increasingly sustainable development in these areas and their surrounds, which has informed the proposed Variation. However, the Council is of the view that the inclusion of phasing or conditionality within Specific Local Objectives (SLOs) reflects the need to ensure that where additional large-scale residential development is being proposed, it is supported by appropriate transport capacity, network resilience and operational reliability, having regard to: • Existing peak-hour congestion on the strategic road network • Capacity constraints at key junctions and corridors • The cumulative impacts of multiple zoned lands coming forward concurrently

There is also continuation of significant investment in Active Travel across the county and significant uplift in bus services under BusConnects. The NTA have indicated their view that, where it can be demonstrated that accessibility to existing services, including transport, is relatively high and that development can occur in a manner which consolidates the built-up area of Metropolitan Dublin or is contiguous to the built-up area, it may not be in the best interest of maximising transport and land use integration to tie a site's progress for housing to that of a major transport infrastructure scheme. In particular, the level of service currently provided by the existing rail lines; the extensive network of bus services across the County; and the proximity of other services or trip attractors, should be taken fully into account in determining the priority afforded to each site	The Planning Authority is aware, through public submissions to this and other consultation processes and through matters coming forward at Council and Area Committee meetings, that there is a public perception that the public transport service is not meeting local needs in some areas. In this regard, the delivery of improved bus and rail services, through the identified key projects or otherwise, would have a positive impact for these areas, potentially releasing capacity on the road network which would further improve bus services. It is also noted that the OPR has highlighted the importance of the Planning Authority's continued engagement with relevant infrastructure agencies to ensure that in the short to medium term the delivery of critical infrastructure such as Dart+ Southwest is progressed in coordination with housing delivery. In this context, conditionality linked to the progression of strategic transport schemes is intended to ensure orderly development, safeguard public investment, and avoid premature developments that would exacerbate transport deficits. The NTA's stated endeavour to enhance existing services and provide additional services to support development in these locations, subject to funding, is noted. The two recommendations from the NTA are taken into account and responded to in the paragraphs below.

subject of this variation, and any conditions attached to their development. It is stated that the NTA will endeavour to enhance existing services and provide additional services to support development in these locations, subject to funding. In conclusion, the NTA have made the following two recommendations: i That the requirement for DART+ Southwest to have commenced construction for the development of sites close to Lucan and Adamstown is reviewed in the context of the level of accessibility offered by existing rail and bus services; and ii That Policy CS3 is amended in order to ensure that Area-Based Transport Assessments (ABTA) will form part of the preparation of statutory land use plans for Future	

Strategic Long-Term Development Areas.	
Summary - Site Specific Observations The NTA has noted that Finnstown Castle, Adamstown West and Tubber Lane lands identified in the variation each have an associated SLO that development may not commence until Dart+ Southwest has commenced construction. The NTA is of the view that SDCC 'should' in the case of Finnstown and 'may wish to' in the case of Adamstown West and Tubber Lane, review the condition (SLO) attached to the development at each site. They set out the rationale for this view on each as follows: ***Finnstown Castle (CS7 SLO3)*** Finnstown Castle is currently directly served by the C1, L53 and P29 buses which provide a total of 14 services in the peak hour, 12	The NTA have indicated that SDCC 'should' review CS7 SLO3 which is associated with the proposed Variation for the lands at Finnstown (Finnstown Castle, Amendment no. 3). This specific local objective (SLO) states, alongside a number of other requirements for the lands, that: 'Development may not commence until Dart+ Southwest has commenced construction' The Council notes the NTA's assessment of existing bus and rail services serving the Finnstown Castle lands, including proximity to Adamstown Station and the availability of high-frequency bus services under existing and enhanced BusConnects operations. While acknowledging that the site demonstrates a medium–high public transport accessibility level using PTAL analysis, the Council considers it necessary to retain a cautious approach to sequencing, given: • The scale of development existing and proposed and resultant increased demand on the services; • The ongoing concerns around the capacity of existing services to accommodate growth; • The existing congestion on the roads impacting efficiency of bus services; and • The need to avoid a habitual pattern of travel by car which makes a behavioural change to public transport later more difficult to achieve. It is approximately 1km from the lands at Finnstown to the train station at Adamstown, this is within the distance defined in the *Sustainable Residential Development and Compact Settlement Guidelines 2024* as being accessible to high-capacity transport nodes. Given the

serving Dublin City Centre and 2 serving Liffey Valley Interchange. It is also very close to Adamstown Station which offers 4 rail services to the City Centre in the AM Peak Hour. Furthermore, assuming that any emerging development at this location would provide pedestrian permeability to the north, the C2 may also be considered to be within walking distance of the site, with its offer of 8 services in the peak hour. The lands of Finnstown Castle therefore benefit from a medium-high level of service using the NTA's Public Transport Accessibility Level tool (PTAL) analysis. The development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services.	above and the regular congestion along the R120, which impacts on the existing bus service reliability and time to get to the city centre, it is considered prudent to retain the requirement for the alignment of housing development with the commencement of construction of the DART+SW project. However, if an equivalent rail service to the Dart+SW project can be delivered, the SLO should be amended to provide for such. **CE Recommendation Finnstown** To amend point 1 in CS7 SLO3 to read: 'Development may not commence until Dart+ Southwest **or an equivalent rail service** has commenced construction **or operation, as may be relevant**'
Adamstown SDZ West - CS7 SLO4	The NTA have indicated that SDCC 'may wish to' review CS7 SLO4 which is associated with the proposed Variation for the lands at Adamstown West (Adamstown SDZ West, Amendment no.

Described in the submission as West of Adamstown Strategic Development Zone (SDZ), the NTA have indicated that once the various roads are available for use by buses, this site is intended to be served by the C2 bus with 8 services in the peak hour. It is also very close to Adamstown Station which offers 4 rail services to the City Centre in the AM Peak Hour. Furthermore, this site is contiguous to the built-up area of Dublin and future residents would be able to avail of the services (retail, schools etc.) within the SDZ. Parts of this site already benefit from a medium-high level of service under PTAL. The development of this site would align with the principle of developing lands contiguous to the built-up area in locations served by existing and proposed public transport services.	2). This specific local objective (SLO) states, alongside a number of other requirements within the SLO for the lands, that: 'Development may not commence until Dart+ Southwest has commenced construction' The Council has proposed these lands based on their ability to benefit from proximity to Adamstown Station and planned BusConnects services. It is noted that once the various roads are available for use by buses, this site is intended to be served by the C2, which the NTA indicates has 8 services in the peak hour. These lands are immediately adjacent to existing road infrastructure, being at the termination point of Adamstown Way on which the C2 travels from Adamstown Station to Sandymount by way of Shackleton Drive. The route currently runs down Aderrig Park Avenue as a temporary route until such time as there is connection further to the west of the SDZ to the Celbridge Link Road. While the current bus route is generally within walking distance from the Adamstown West lands, that distance will shorten over time increasing the appeal of the service. The Council notes the NTA's suggestion that development need not be strictly tied to the commencement of DART+ Southwest construction. However, the Council is mindful of: • The cumulative impact of development within and west of the SDZ and resultant increased demand on the public transport services; • The necessity for internal road completion and greater bus penetration; • The ongoing concerns around the capacity of existing services to accommodate growth; • The existing congestion on the roads impacting efficiency of bus services; and • The need to facilitate a behavioural choice in the first instance where commuting by public transport is a preferred and realistic option to the car.

	An improved rail service would offer greater reliability and speed of service into the city for those within reach of it, help to free up road infrastructure necessary to improve the bus service which in turn would facilitate improved services for the wider area where rail is not an option. The Council therefore considers that phased development, linked to demonstrable improvements in public transport capacity (including BusConnects service uplift), remains appropriate. However, if an equivalent rail service to the Dart+SW project can be delivered, the SLO should be amended to provide for such. **CE Recommendation Adamstown West** To amend point 1 in CS7 SLO3 to read: 'Development may not commence until Dart+ Southwest **or an equivalent rail service** has commenced construction **or operation, as may be relevant'**
Tubber Lane - CS7 SLO5 Given the site's location 1.5km from Adamstown Station, the link between the development of this site and the DART+ Southwest scheme is not clear. While development at Tubber Lane will require significant investment in transport infrastructure and services, the NTA would be of the view that this would relate to bus services and active travel infrastructure primarily.	The NTA have indicated that SDCC 'may wish to' review CS7 SLO5 which is associated with the proposed Variation for the lands at Adamstown West. This specific local objective (SLO) states, alongside a number of other requirements for the lands: 'Development may not commence until Dart+ Southwest has commenced construction'. It is acknowledged that the Tubber Lane site is approximately 1.5km from the train station. While recognising that this is a distance beyond the distance defined as being accessible to a high capacity DART or high frequency Commuter Rail (itself defined as 10-15 minute peak hour frequency), it is considered that there should be further analysis of accessibility to the high capacity rail or bus service as part of the masterplan for the lands included in the SLO. This would allow for further consideration of the benefits of linking the lands to Dart+SW commencement and / or bus services as part of a wider improvement of public transport capacity, routing and services within the Adamstown area.

	It is approximately 900m to the city bound bus stop along the Celbridge Road served by the C4 service and the X27 to UCD, a core bus corridor route. There is potential for a new pedestrian / cycle access from Tubber Lane to the bus stop at Shackleton Drive served by the C2 route, a distance of approximately 500m which is within the distance defined as being served by a high-capacity public transport node. Given the above, it is acknowledged that the distance to the rail station is greater than that envisaged in the Sustainable Residential Development and Compact Settlement Guidelines 2024 as being accessible. However, it is also considered important that connections to facilitate residents to access the train service are important given that it is within a short bus journey or cycle from the lands. As such, a comprehensive assessment of the potential for improved accessibility to the train station should be undertaken as part of the traffic and transport assessment required by way of CS7 SLO5. The combined options of bus and an improved train service for those within Adamstown and the proposed Variation lands are considered important in terms of releasing capacity of services and related road infrastructure to serve those relying on the bus services in the wider Lucan area. This can be incorporated into CS7 SLO5 through a revision to the SLO. **Recommendation Tubber Lane** To amend point 1 in CS7 SLO3 to read:

	'Development may not commence until Dart+ Southwest **or an equivalent rail service** has commenced construction **or operation, as may be relevant'** And to amend point 5 to read: A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: a. Retention and enhancement of the north-south hedgerow as recorded on 1st Edition OS maps, unless required for wider movement needs, b. Ensure compliance with G13 (Riparian Corridors) in relation to any watercourses on site, c. A Social Infrastructure Audit and provision within development proposals to address any needs identified, d. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, **informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as defined in the Sustainable Residential Development and Compact Settlement Guidelines;** and e. A Public Open Space Audit to inform proposals for public open space and recreational facilities.
Other Sites: Lucan and Palmerstown	**St. Edmundsbury Response** The NTA's acknowledgment that St. Edmundsbury is well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes is welcomed.

The NTA notes the proposals to rezone a large number of sites throughout the County. It is the view of the NTA that those sites to the north at Lucan and Liffey Valley, additional to Finnstown Castle, Adamstown West and Tubber Lane, are well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. The sites at St. Edmondsbury (sic), Liffey Valley and Coldcut are served by a variety of radial and orbital services while the site at the Foxhunter could potentially be served effectively by the same services, subject to details of any emerging development proposal.	Lands at Lucan, Liffey Valley, and Coldcut have been prioritised due to existing and planned public transport provision. **CE Recommendation St Edmundsbury** No change **CE Response Foxhunter** The NTA has indicated that the sites at St. Edmundsbury, Liffey Valley and Coldcut are served by a variety of radial and orbital services and that the site at the Foxhunter could potentially be served effectively by the same services, subject to details of any emerging development proposal. In this context, it is noted that St. Edmundsbury and by extension the Foxhunter lands are well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. This view from the NTA is noted and welcomed. **CE Recommendation Foxhunter** No change **Liffey Valley Response** The NTA's acknowledgment that Liffey Valley is well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes is welcomed. Lands at Lucan, Liffey Valley, and Coldcut have been prioritised due to existing and planned public transport provision in this area. It is noted that the Liffey Valley to City Centre scheme will be the first scheme to commence and this is welcomed. It is also noted that Liffey Valley, as part of the Bus Connects scheme,

	has now delivered on the bus interchange with associated changes to car parking and traffic movement within the area surrounding the retail centre. The Lucan to City Centre Bus Connects scheme is advancing with Notice to Treat issued to landowners in April 2026. **CE Recommendation Liffey Valley** No change **Coldcut Response** The NTA's acknowledgment that the lands at Coldcut are well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes is welcomed. Lands at Lucan, Liffey Valley, and Coldcut have been prioritised due to existing and planned public transport provision within the area. The commencement of the Liffey Valley to City Centre scheme is welcomed. It is also noted that the adjacent lands at Liffey Valley, as part of the Bus Connects scheme, have now delivered on the bus interchange with associated changes to car parking and traffic movement within the area surrounding the retail centre. The Lucan to City Centre Bus Connects scheme is advancing with Notice to Treat issued to landowners in April 2026. **CE Recommendation Coldcut** No change
Other Sites: Newcastle	**CE Response Newcastle**

The NTA has noted that while the proposed rezoning at Newcastle is not as accessible as those to the north of Lucan and at Liffey Valley and Coldcut, it may still be regarded as aligning with the principle of consolidation into existing settlements.	While the NTA notes that Newcastle is not as well served by public transport as some of the other sites in the proposed variation, they recognise that lands at this location align with the principle of consolidation into existing settlements. The Council is in the process of producing a Western Area Transport Plan to calculate the sustainable transport demand from the existing and future planned development in this part of the county. This strategic transport plan will arrive at a list of phased transport schemes at a strategic and local level to cater for the current and future transport needs of the western area of SDCC. The Council will continue to work with the NTA to facilitate service improvements. Currently Dublin Bus route 68 runs from Greenogue through Newcastle to Dublin. The W6 operated by Go-Ahead Ireland provides an orbital service between and Tallaght and Maynooth via Newcastle with stops at Hazelhatch Train Station. **CE Recommendation Newcastle** No change.
Other Sites: Rathcoole The NTA has indicated that the proposed rezoning (sic) at Rathcoole, while not as accessible as those north of Lucan and at Liffey Valley and Coldcut, may still be regarded as aligning with the principle of consolidation into existing settlements.	It should be noted that the lands in Rathcoole are already zoned. The proposed Variation is removing a strategic residential reserve objective which was adopted in 2022 to ensure that the zoned lands in that instance would have a longer-term delivery capacity as they were not required to meet the targets at that time. The proposal in this Variation is to remove this constraint to the development of the lands, noting that they consist of approximately 2 hectares. The NTA notes that Rathcoole is not as well served by public transport as some of the other sites in the proposed variation but recognises that lands at this location align with the principle of consolidation into existing settlements.

	The Council is in the process of producing a Western Area Transport Plan to calculate the sustainable transport demand from the existing and future planned development in this part of the county. This strategic transport plan will arrive at a list of phased transport schemes at a strategic and local level to cater for the current and future transport needs of the western area of SDCC. **CE Recommendation Rathcoole** No change.
Other Sites: Citywest The NTA notes that Citywest is within walking distance of Luas and is served by a radial and an orbital bus service.	It is noted that the NTA indicates that Citywest is within walking distance of Luas and is served by a radial and an orbital bus service. The proximity to public transport was one of the factors which informed the identification of the lands for inclusion in the proposed Variation. **CE Recommendation** No change
Other Sites: Kiltipper The NTA indicate that one of the lowest priority sites, from a transport accessibility point of view is located at Kiltipper Road.	The NTA has indicated that this site is one of the lowest priority sites, from a transport accessibility point of view. The Council acknowledges that this site is less well served by public transport than others. However, the lands are subject to a specific local objective which includes the requirement for: 1. A Transport and Traffic Assessment shall be carried out and submitted to the planning authority as part of a planning application for residential development on the subject lands, addressing access to and from the subject lands, measures to alleviate the impact of the proposed development on the surrounding road network, proposals to upgrade Kiltipper Road where necessary and active travel links from the subject lands to the surrounding area.

<table>
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<td>The new development at Killinarden accommodating over 600 units to the west of the Variation lands includes provision for a new road network and link to connect to the Blessington Road in the vicinity of the proposed Variation lands. This connection will facilitate new improved bus services which will also serve the Variation lands.

The Council will continue to engage with the NTA to improve bus services in this area.

CE Recommendation Kiltipper
No change</td>
</tr>
<tr>
<td>Other Sites: Edmondstown Road
The NTA indicate that one of the lowest priority sites, from a transport accessibility point of view is located at Edmondstown Road.</td>
<td>The NTA has indicated that Edmondstown Road is one of the lowest priority sites, from a transport accessibility point of view. The lack of access to public transport for this site and for the existing zoned lands at Whitechurch-Edmondstown is recognised. It is in this context that the Council is seeking to overcome the transport issues by way of amendments 22 and 23 which would both assist in unlocking the long-time zoned land immediately south of the M50 and facilitate the rezoning of the Edmondstown Road lands. A new specific objective for Amendment 22, the Edmondstown Road upgrade states:

‘New 6 year roads objective (Table 7.5 of CDP) for upgrade of Edmondstown Road to enhance pedestrian, cycling and public transport facilities and provide access to new residential areas.’

This is reflected in the amendments to Table 7.5 Six Year Road Programme in the Written Statement as follows:
<table>
<tr><th>Road</th><th>Description</th><th>Function</th></tr>
<tr><td>Edmondstown Road Upgrade</td><td>Upgrade of existing road</td><td>To enhance pedestrian, cycling and public transport facilities and access to new residential lands.</td></tr>
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As reflected further in the CE Report, the CE has recommended revision to the described 'Function' of Amendment 22 as follows:

To enhance pedestrian, cycling and public transport facilities and access to newly developed residential lands.

Amendment 23 is for a connecting road between Whitechurch Road to the east and Edmondstown Road to the west to facilitate the release of zoned lands at this location. The proposed amendment includes a new specific objective to insert the following into Table 7.5 of the Written Statement:

Road	Description	Function
Link between Edmondstown Road and Whitechurch Road	New road / street and associated junction upgrades connecting Edmondstown Road and Whitechurch Road.	To provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands.

In addition, the current CDP has the following existing SLO on the 'RES' zoned lands at Whitechurch-Edmondstown:

SM4 SLO1:
To ensure that development on these lands at Whitechurch / Edmondstown is facilitated through a comprehensive transport needs assessment, to identify all necessary transport

	infrastructure, its preferred location, and the appropriate delivery mechanisms in consultation with relevant stakeholders. The transport needs assessment shall have regard to existing environmental sensitivities in the area. It is recommended that, to ensure the phased development of the existing 'RES' lands that SM4 SLO1 be amended by the addition of the following: *Development of the subject lands shall be phased in accordance with the delivery of roads and public transport and active travel infrastructure to the satisfaction of the Planning Authority.* Having regard to both amendments proposed to Table 7.5 involving upgraded and new road connections, and the further amendments, it is considered that while public transport is currently unavailable, it will be feasible once the necessary road upgrade is complete. The Council will engage further with the NTA to facilitate an appropriate public transport connections to the lands. Further, Amendment 7 Edmondstown Road (rezoning) includes a Proposed Specific Local Objective which states: Development on RES zoned lands on Edmondstown Road shall comply with the following: a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority. b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage. c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping insofar as possible within development proposals.

	It is considered that this should be amended to add a new point d. to include for phased delivery in line with road upgrades required for the delivery of public transport as follows: *d. Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be complete prior to the occupation of development. Measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 shall be agreed with the NTA.* **CE Recommendation** To amend the Proposed Specific Local Objective CS7 SLO6 for the Edmondstown Road lands as follows: a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority. b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage. c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping insofar as possible within development proposals. **d. Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be complete prior to the occupation of development. Measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 shall be agreed with the NTA.** To amend existing Specific Local Objective SM4 SLO1 on the Whitechurch-Edmondstown lands as follows:

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SM4 SLO1
To ensure that development on these lands at Whitechurch/Edmondstown is facilitated through a comprehensive transport needs assessment, to identify all necessary transport infrastructure, its preferred location, and the appropriate delivery mechanisms in consultation with relevant stakeholders. The transport needs assessment shall have regard to existing environmental sensitivities in the area. Development of the subject lands shall be phased in accordance with the delivery of roads and public transport and active travel infrastructure to the satisfaction of the planning authority.

To amend the Proposed Function in Table 7.5 Six Year Road Programme in the Written Statement as follows:

<table>
<tr><th>Road</th><th>Description</th><th>Function</th></tr>
<tr><td>Edmondstown Road Upgrade</td><td>Upgrade of existing road</td><td>To enhance pedestrian, cycling and public transport facilities and access to newly developed residential lands.</td></tr>
</table>
</td>
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<tr>
<td>Other Sites: Stocking Avenue
The NTA indicate that one of the lowest priority sites, from a transport accessibility point of view is located at Stocking Avenue.</td>
<td>CE Response
The lands at Stocking Avenue are identified in the adopted County Development Plan as a school site. The proposed Variation has indicated the removal of the school objective for the site, retaining the underlying residential zoning which has been in place since 1998. It is noted that the intention of a school site at this location in the original Area Action Plan in 2001 was to have it ‘central to the area to be served so as to discourage excessive transport of children to school by private car’. The Department of Education and Youth’s observations on the site are noted in this regard.</td>
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</table>

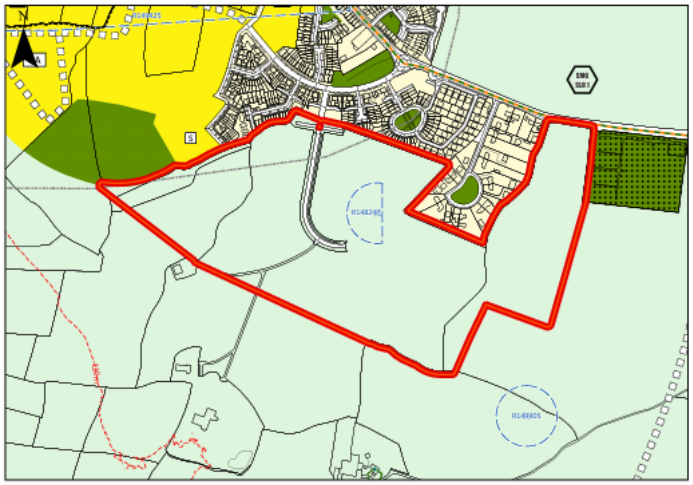
	As a site for residential use, it would be located within a wider residential development area, a significant percentage of which has been delivered through the now expired Ballycullen-Oldcourt Local Area Plan, with the remaining zoned lands either subject to future permissions or with more recent permissions yet to commence or complete. As part of a growing area within the county, zoned for a number of plan cycles, it is important that the current public transport service improves to match demand. Therefore, while the NTAs observations on accessibility are noted, it is considered that the site is within an area which has grown as part of long planned development and which will, as demand grows, be provided with improved transport accessibility. **CE Recommendation** No change.
Policy CS3: Future Strategic Long-Term Development Areas The NTA notes the identification of future strategic long-term development areas at Adamstown South and West (Outer), Belgard, Newlands, Grange Castle, and the objectives which apply to their progress. The NTA is satisfied that in the long-term, development at these locations could potentially align with the principles of transport and land-use integration as long as their development is	**CE Response** The Council welcomes the NTAs view that the Future Strategic Long-Term Development Areas could potentially align with the principles of transport and land-use integration subject to a statutory land use plan providing for growth in line with the provision of transport infrastructure and services. The intention of the Future SDA designation is to allow for the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders including the NTA and TII to plan for the release of lands as need arises in the 2030s, to inform rezoning proposals. The observations on Newlands and the interface with the existing transport infrastructure is noted and will be a key consideration as part of the plan-led approach to these lands set out in Policy CS3. An objective within that policy clearly sets out the intent for a statutory process and the need for sustainable transport options as follows:

subject to a statutory land use plan which provides for the phasing of growth in line with the provision of transport infrastructure and services. In the case of Newlands in particular, this should include an assessment of the interface between any emerging developments and the Red Cow Luas services and depot facilities, and the potential impacts on the N7 National Road. It is the view of the NTA that the most appropriate mechanism to achieve the above is through undertaking Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII), as part of the preparation of statutory land use plans. The need for an ABTA for these sites should be included within the objectives under Policy CS3.	*CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* The benefit that an Area-Based Transport Assessments (ABTA) could bring to the process is noted and considered appropriate to include by way of a further objective under Policy CS3. **CE Recommendation** To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows: **CS3 Objective 4** **To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.**

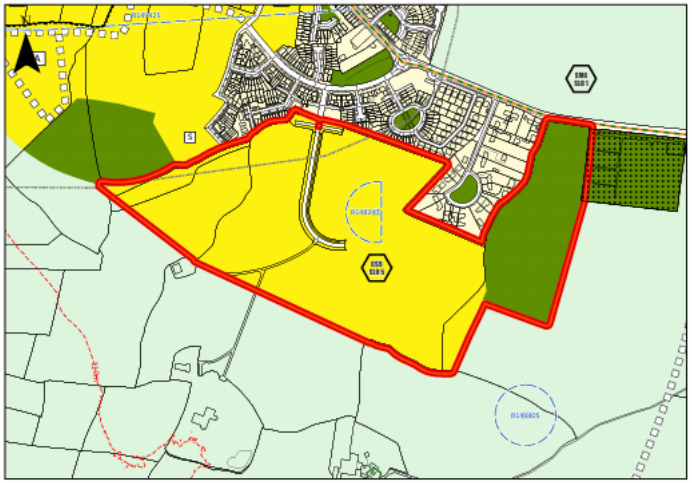
Section 3 – Summary of the Issues Raised by Other Persons and the Response and Recommendations of the Chief Executive.

3.1 Amendments relating to lands within the Variation

AMENDMENT NO. 1 - BALLYNAKELLY NEWCASTLE



Existing



Proposed

Submission No.

SD-C401-CDP25-3 – Stephen Nolan	SD-C401-CDP25-343 – Dijo Joseph	SD-C401-CDP25-380 – Newcastle Community Council
SD-C401-CDP25-636 – Alison golding	SD-C401-CDP25-714 – Katie Keane	SD-C401-CDP25-809 – Cllr Trevor Gilligan PC
SD-C401-CDP25-817 – Faye Kinsella Kinsella	SD-C401-CDP25-840 – John Kinsella	SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-881 – Susan Daly	SD-C401-CDP25-1071 – Linda Garrigan	SD-C401-CDP25-1144 – Michael Haynes
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1423 – Niamh C	SD-C401-CDP25-1425 – Emer Colgan
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1463 – Ger Nolan	SD-C401-CDP25-1489 – Laragh Warfield Warfield
SD-C401-CDP25-1494 – Jeanette Glynn	SD-C401-CDP25-1505 – Ahmed Assem	SD-C401-CDP25-1513 – National Transport Authority
SD-C401-CDP25-1546 – Roy O'Rourke	SD-C401-CDP25-1550 – Cllr Linda de Courcy	SD-C401-CDP25-1556 – Georgina Moran
SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1660 – Linda Butler	SD-C401-CDP25-1666 – Shane Moynihan TD
SD-C401-CDP25-1674 – Lisa Duggan	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1734 – Matthew Roberts

Summary	CE Response
Submissions were received from individual residents, elected representatives, and prescribed bodies in relation to the lands at Ballynakelly being rezoned as New Residential 'RES-N' and Open Space 'OS.' The submissions generally opposed the rezoning of the lands due to lack of infrastructure, such as roads,	**Amendment no. 1 – Ballynakelly** This Amendment at Ballynakelly, Newcastle proposes to change 24.47ha of land from Objective Rural 'RU' to Objective New Residential 'RES-N' (19.56ha) and Open Space 'OS' (4.91ha). The Amendment attaches a specific local objective to the lands as follows:

public transportation, community services, and schools. **Zoning** In general, the submissions object to the proposed rezoning at Ballynakelly unless the deficit of infrastructure and service are dealt with prior to or concurrent with housing development. Results of an online public poll carried out by a local councillor were submitted in respect of a range of sites proposed to be rezoned as part of Variation No. 2. The results shown in the submission for the proposed rezoning at Ballynakelly indicated 4 in favour, 26 against. The submissions assert that rezoning is premature given that substantial zoned lands remain undeveloped and critical infrastructure, including strategic road improvements, reliable public transport, and a confirmed secondary school provision, has not been delivered. Additionally, there lacks confidence in assurances of future infrastructure delivery. Submissions assert that development has been piecemeal in nature due to reliance on a Local Area Plan rather than a more strategic approach, and it is noted that similar rezoning proposals were previously refused. Overall, the submissions highlight ongoing deficiencies in:	CS9 SLO5: *Development on RES-N zoned land south of Ballynakelly shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development which provides for, inter alia:* *1. Delivery of a public park of a minimum of 2 hectares in tandem with, or prior to, development of the site,* *2. Reservation of a secondary school site of 3 hectares unless otherwise agreed in writing by the planning authority having regard to the requirements of the Department of Education and Youth,* *3. Active travel connections to the existing Taobh Chnoic Park and land to the east, and* *4. Use of the existing unfinished structure on site in an early phase of development in a sustainable manner which is compatible with neighbouring residential uses.* **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by

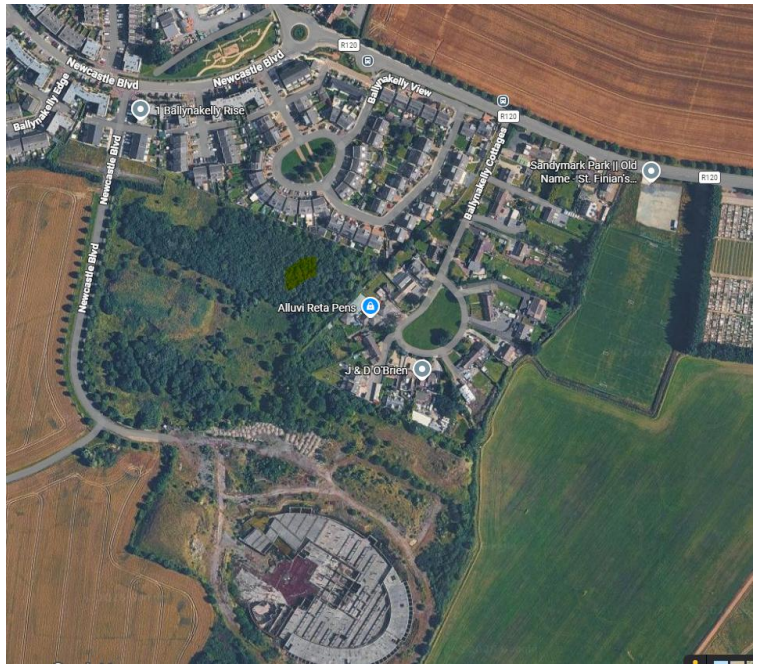
- transport, - traffic, - community facilities, and - school provision. **Overdevelopment** The submissions raise concerns regarding the rezoning of lands at Ballynakelly, and within Newcastle generally, on the basis that population growth has significantly outpaced the delivery of essential infrastructure, services, and amenities. It is noted that rapid residential expansion in recent years has not been matched by corresponding investment in transport, education, healthcare, roads, utilities, or community facilities, despite it being recognised as a self-sustaining growth town. **Traffic and Roads** The submissions raise concerns regarding traffic congestion, road safety, parking pressures, and the capacity of the existing road network in Newcastle. It is asserted that the increase in residential and industrial development has intensified congestion, reduced environmental quality, and placed unsustainable pressure on village infrastructure, with the proposed Ballynakelly development likely to further exacerbate these impacts and negatively affect residents. Key related issues are:	the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus

- The absence of strategic road infrastructure, with repeated reference to the requirement for an additional N7 interchange (Junction 4A) to serve Newcastle and Rathcoole. - Limited access routes into and out of Newcastle. - Roads are described as narrow, flood-prone in places, lacking footpaths and lighting, and unsuitable for current traffic volumes (Aylmer Road and Hazelhatch Road). - Local and rural roads are unable to accommodate the sustained use of increased Heavy Goods Vehicles (HGV) from nearby industrial development. - There are parking shortages due to unallocated parking spots in residential areas. - Pedestrian and cyclist safety are at risk. - There are little to no EV charging points operating. Overall, the submissions conclude that further residential development should not proceed without the prior or concurrent delivery of strategic road infrastructure, traffic mitigation measures, parking provision, and pedestrian and cyclist safety improvements. **Public Transportation** The submissions highlight significant lack of public transport in Newcastle, noting that existing bus services are limited in frequency, capacity, and	on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Zoning and Overdevelopment** As indicated above, the proposed Amendment consists of a total 24.47ha of land which it is proposed to rezone from Objective Rural 'RU' to Objective New Residential 'RES-N' (19.56ha) and Open Space 'OS' (4.91ha). The Amendment also includes CS9 SLO5 which, with the requirement for a reservation for a school site and a minimum 2-hectare public park should go to address many of the concerns around school provision and other concerns on community infrastructure / open space. Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The subject site is located on lands sequential to the Self-Sustaining Growth Town Settlement Area, which would qualify them as an urban extension to a settlement area. The National Policy Objective (NPO) 17 of the National Planning Framework (NPF) First Revision states: *In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or*

connectivity, and do not meet current demand or support further residential development. The introduction of the W6 is considered insufficient due to its limited corridor, irregularity, and overcrowding. As a result, Newcastle remains heavily car-dependent, leading to increased congestion and pressure on the local road network, and the absence of dedicated school transport requires students to rely on unreliable or indirect services to schools outside the area. The submissions conclude that public transport infrastructure frequency, capacity, and connectivity should be addressed as a priority before additional land is rezoned for housing. **Community and Social Infrastructure** The submissions object to the proposed housing development at Ballynakelly on the grounds that Newcastle lacks sufficient community, social, health, and emergency infrastructure to support additional residential growth. It is stated that long-standing infrastructure commitments have not yet been delivered. The absence of community and recreational facilities, including a sports hall, is identified as a deficit impacting residents' health, wellbeing, and quality of life. Concerns are also raised regarding health and emergency services: - Newcastle is currently served by one GP practice with limited hours. - There is no public health nurse in the area.	*more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:* • *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and* • *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in the NPO 3 for the Eastern and Midlands region is 50% of new city housing within Dublin City and suburban footprints and 30% of all new housing, elsewhere within existing urban footprints. The latter applies to Newcastle. As of the 2022 Census, Newcastle had a population of 4,526. Between Q3 2022 and the end of Q1 2026 (after the census in 2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (units multiplied by average household size of 2.9 persons). Thus, Newcastle has seen an increase of approximately 22% since 2022. The concerns regarding overdevelopment are noted, it is acknowledged that Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% change in growth between the years 2006 and 2022.

- No progress has been made on the delivery of a previously proposed health centre. - Emergency services, including Gardaí and fire services, are described as operating at capacity while serving multiple expanding areas. The submissions conclude that further residential development should not proceed unless essential infrastructure and amenities are delivered in advance of, or concurrently with, any new housing, in accordance with principles of sustainable development. **Schools** The submissions raise serious concerns regarding lack of school infrastructure in Newcastle, particularly the absence of a secondary school despite significant population growth. The absence of such requires students to travel to schools in surrounding areas such as Rathcoole, Citywest, and Kildare, where access is often constrained by capacity and catchment limits. The primary school provision is also identified as constrained, with the existing school operating at or near capacity, creating uncertainty for families and limiting enrolment options. The submissions generally conclude that the school provision is inadequate to support its current residents, let alone further residential growth. It is	Examining the growth of Newcastle in this context, it is clear growth should be phased in line with development and that extensive rezoning in Newcastle would not be appropriate. The plan-led growth in Newcastle has been guided by the Newcastle Local Area Plan which was adopted in 2012 and extended in 2017. The Local Area Plan for Newcastle expired in 2022. Development within the Newcastle area, particularly on the remaining RES-N zoned lands, continues to be guided by the CDP 2022-2028 and specific provisions set out therein, including the following key policies and objectives: Policy CS9: *Newcastle Support the sustainable long-term growth of Newcastle by focusing development growth within the current settlement boundary and based on the ability of local services to cater for sustainable growth levels.* CS9 Objective 1: *To ensure that development proposals provide for infrastructure including community buildings, sports pitches and service provision in line with population growth as set out in the Newcastle LAP (2012 extended to December 2022) or any succeeding plan.* Key infrastructure projects under the Newcastle LAP include to date: • Newcastle Street Network is largely delivered, • St. Finian's National School has been provided within the LAP lands and Rathcoole Educate Together National School opened in 2025 in a temporary building on the second designated school site beside Taobh Chnoic Park. Outline permission has been granted for a permanent primary school building on this site.

asserted that further residential rezoning or development should not proceed without clear, binding commitments and delivery timelines from the Department of Education and Youth, and that additional housing should be contingent on the addition of a secondary school and the availability of adequate school capacity. **Biodiversity and Green Infrastructure** Local residents raise objections relating to loss of amenities and environmental impact. Rezoning remaining greenfield lands is expected to negatively affect biodiversity, wildlife habitats, and residents' amenity and privacy. It is argued that these lands should instead be retained as open space and developed for parks, recreation, and community use. **Water and Wastewater** Uisce Éireann determined that Newcastle is feasible for further development per their assessment.	• Plans for a new community centre in Newcastle are ongoing by the Community Department with funding allocated within the 2026-2028 Capital Programme. • Taobh Chnoic Park in Newcastle has recently been completed in accordance with the Local Area Plan. This contains a large play space, exercise equipment, a Multi-Use Games Area (With facility for soccer / tennis and basketball), a large allotment area, a soccer sized grass pitch and provision of walking, jogging and cycling routes in a high-quality landscape. • An Urban Park/Square approximately 1ha in size known as Burgage South Park is to be delivered within the LAP lands. COS5 SLO 1 of the CDP 2022-2028 is an objective to identify and set aside land, ensuring the delivery of the quantum of open space within the general area of the Burgage South Neighbourhood Park as identified in the Newcastle Local Area Plan (2012), and to pursue all means of achieving this including proactive engagement with stakeholders and through the consideration of planning applications affecting this area. Engagement with the relevant stakeholders has occurred and the park is subject to a current planning application. • Smaller local and neighbourhood parks and play spaces have been provided within the new residential developments of Graydon (Newcastle south) and Mason Cross (Newcastle west) as part of the open space requirements for all large-scale residential schemes. • Newcastle has also seen a significant growth in retails services with the provision of two new supermarket developments. Lidl store located off the main street – to west of St. Finian's Church and St. Finian's National School – opened in 2024 and the large Supervalu store located at the eastern side of the LAP lands in close proximity to Graydon, opened in 2023.

	In terms of the proposed lands identified in the Variation, they are located within an area of land which was subject to a previous planning permission and on foot of that have had a partially constructed development left incomplete for a number of years. As such, the lands identified in the Variation include brownfield lands with an existing access point and a completed, tree-lined road which has been incorporated into the layout of new housing at Ballynakelly Rise where it exits onto Newcastle Boulevard. CS9 SLO5 requires the brownfield lands to be developed as part of the early phases of development.  Source: Google maps: Existing tree-lined road connection to brownfield site.

	The Variation also facilitates the delivery of infrastructure which is noted in many of the submissions as required. CS9 SLO5 requires the reservation of a school site of 3 hectares within the overall RES-N lands, reducing the area remaining for housing from 19.56 to 16.56 hectares. In addition, there is a 2-hectare public park required by the SLO on the RES-N lands. An independently conducted online poll was recorded by way of a submission indicating the number of respondents who were for and against the rezoning, there being 26 No and 4 Yes. However, it is not known if any of the respondents made submissions through the variation process. As such, the CE cannot respond further on the results or the reasons for them. **Schools** As indicated above, two primary schools have been delivered as part of the phasing of the LAP lands, noting that as an interim measure, Rathcoole Educate Together National School (ETNS) opened in 2025 in a single storey detached temporary school at the second reserved site at Graydon Road, beside Taobh Chnoic Park. Outline permission is granted for a permanent school building on the same site under Reg. Ref. SD24A/0032W. The County Development Plan contains an objective to identify a post-primary school site to serve the wider area under COS8 SLO 1 of the CDP 2022-2028 which states: COS8 SLO 1 *To identify a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest / Saggart /*

	Rathcoole / Newcastle to provide for the needs identified for the catchment area by the Department of Education. It is noted that the Department of Education and Youth, in their submission in respect to Variation No. 2 and Newcastle, Ballynakelly lands state the following; *'The department notes that as per Table 11 Core Strategy there is a projected 516 potential units in this settlement. This is 118 units above the current CDP figures. These projected figures could see an increase in primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required. In the context of post primary provision, the projected growth figures could see a significant increase in post primary school place demand, which potentially could be accommodated within existing post primary schools and current capital projects.'* However, the Department of Education and Youth also state that they: *'acknowledge Specific Local Objective CS9 SLO5: to develop RES-N zoned land south of Ballynakelly which will include the reservation of a secondary school site of 3 hectares unless otherwise agreed in writing by the planning authority regard to the requirements of the Department of Education and Youth.'* The Department notes and supports existing County Development Plan Policy COS8: Primary and Post Primary Schools, to work in conjunction with the Department of Education to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of communities and, to engage with the Department of Education and support the Department's School

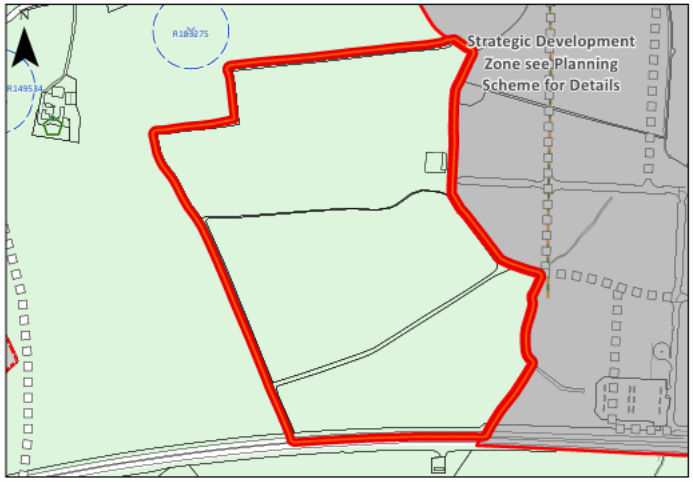
	Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need. A masterplan will have to be done prior to the development of the site which will require further engagement with the Department of Education and Youth prior to the residential delivery of the site. **Community and Social Infrastructure** As outlined above, plans for a new community centre in Newcastle are ongoing by the Community Department with funding allocated with the 2026-2028 Capital Programme. Furthermore, the additional open space zoning proposed as part of the Variation will ensure a significant new area of zoned open space to the east and adjoining the proposed development area facilitating lands for active recreation. The requirement in the SLO for a minimum of 2 hectares for a public park is additional to this, within the RES-N zoned lands. This requirement will help facilitate a green infrastructure link between the proposed new OS zoning and the recently completed Taobh Chnoic park to the west, also adjoining the proposed Amendment lands. The requirement for an active travel link between the two is also part of the SLO. While submissions have indicated a lack of GP and other healthcare provision within Newcastle, this is not something the Planning Authority can provide directly. The Planning Authority will continue to liaise with the HSE in the delivery of Primary Care Centres, noting that one has recently been permitted in Citywest.

	Traffic and Roads The concerns around traffic are noted. The County Development Plan includes the following objective: SM6 SLO 1 *To carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement.* The Council is currently preparing a brief for consultants to identify the transport needs and solutions for the western area of the County, including the three metropolitan towns of which Newcastle is one. It is envisaged that the Transport Assessment and Transport Plan will be developed using an Area-Based Transport Assessment (ABTA) methodology, in accordance with TII and NTA guidance, and that one or more Local Transport Plans will be prepared. Subject to the final scope, the process is expected to include public consultation and will assess existing and future travel demand across all transport modes, review existing and planned transport infrastructure and services, identify the need for additional transport interventions, assess options including phasing and cost implications, and identify an integrated package of transport solutions. In parallel, it is intended to identify a number of interim local measures to address traffic management issues within the study area. As such, this transport study will seek to address both strategic and local transport needs, and it is anticipated that consultants will be employed to undertake the study in Q2 2026.

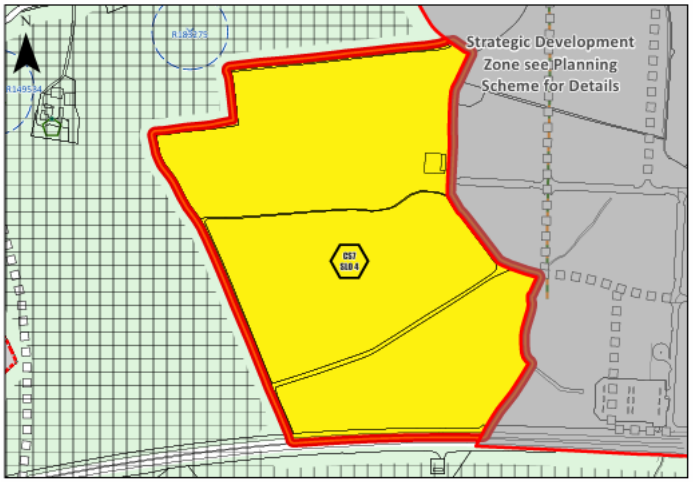
	Parking standards are set through national policy and planning guidelines which are incorporated into the County Development Plan. **Public Transport** While the National Transport Authority notes that Newcastle is not as well served by public transport as some of the other sites in the proposed variation, they recognise that lands at this location align with the principle of consolidation into existing settlements. The Council will continue to work with the NTA to facilitate service improvements. Currently Dublin Bus route 68 runs from Greenogue through Newcastle to Dublin. The W6 operated by Go-Ahead Ireland provides an orbital service between and Tallaght and Maynooth through Newcastle with stops at Hazelhatch Train Station. Additionally, it is noted that the DART+ South West project will extend as far as the Hazelhatch Train Station, which is roughly 3km from Newcastle village centre. Dart+ South West's Railway Order was permitted in November 2024. The National Development Plan (NDP) review, published in November 2025, gave a construction date of "2030+" with the procurement timeline set for 2028-2029. **Water and Wastewater** The submission from Uisce Éireann is noted, which determined that Newcastle is feasible for further development per their assessment. **Biodiversity and Green Infrastructure** Significant areas of land, at least 6 hectares, are included within this Amendment for open space and a public park. Current County Development Plan policy has strong policy and objectives around biodiversity and green infrastructure which will be applied to the

	assessment of planning applications. It is also noted that a large section of the site has already been granted planning permission with a partially completed structure on the site. The implementation of South Dublin's Green Space Factor will also ensure that key areas of biodiversity and GI can considered as part of development of the site. **Conclusion** Having regard to the location of the lands within Newcastle, which include a partially complete structure on brownfield lands, an existing road and access point to Newcastle Boulevard, in proximity to the R120 and to the inclusion of the open space zoning, a school site reservation and a further 2 hectares of public park within the proposed RES-N lands, it is considered that the proposed Amendment no. 1 at Ballynakelly, Newcastle represents sustainable development which will benefit the local community and is appropriate for inclusion towards meeting the NPF targets. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to Variation No. 2 (Amendment no. 1) to the South Dublin County Development Plan 2022-2028.	

AMENDMENT NO. 2 - ADAMSTOWN SDZ WEST



Existing



Proposed

Submission No.

SD-C401-CDP25-2 – Igor Shcherba Shcherba

SD-C401-CDP25-19 – David McCormack

SD-C401-CDP25-30 – David Lane

SD-C401-CDP25-32 – Graham Forde

SD-C401-CDP25-33 – Matthew McCann

SD-C401-CDP25-39 – Jorge Collado

SD-C401-CDP25-40 – Joy Graham

SD-C401-CDP25-41 – Ilya Ustinov

SD-C401-CDP25-42 – Kate Taylor

SD-C401-CDP25-44 – Ciaran Henry

SD-C401-CDP25-45 – Nicola Henry

SD-C401-CDP25-46 – Ruth French

SD-C401-CDP25-47 – Sinead Nolan Nolan

SD-C401-CDP25-51 – David McNamara

SD-C401-CDP25-55 – Catherine Coyne

SD-C401-CDP25-56 – Cathal Nolan	SD-C401-CDP25-69 – Nicky Weir	SD-C401-CDP25-70 – Emmet Rafferty
SD-C401-CDP25-71 – Emmet Rafferty	SD-C401-CDP25-74 – Sophie Henry	SD-C401-CDP25-75 – Kathryn Murray
SD-C401-CDP25-78 – Diane O'Connell	SD-C401-CDP25-83 – Aisling Murphy	SD-C401-CDP25-85 – James Delaney
SD-C401-CDP25-87 – Noelle Whelan	SD-C401-CDP25-92 – Jagadish Mahadevan	SD-C401-CDP25-95 – Kate Henry
SD-C401-CDP25-96 – Darren Brennan	SD-C401-CDP25-101 – Thomas Woods	SD-C401-CDP25-104 – Kim McCrave
SD-C401-CDP25-106 – Marcia McDonagh	SD-C401-CDP25-109 – Mark Kavanagh	SD-C401-CDP25-112 – Elaine McConnell
SD-C401-CDP25-113 – Mark McConnell	SD-C401-CDP25-116 – Áine Byrne	SD-C401-CDP25-117 – Brid McCormack
SD-C401-CDP25-118 – Aoife Flood	SD-C401-CDP25-119 – Maude Mcmenamin	SD-C401-CDP25-121 – Hanna Varghese
SD-C401-CDP25-122 – julieanne anderson	SD-C401-CDP25-124 – Isabella Fitzsimons	SD-C401-CDP25-126 – Laoibhse Curtis
SD-C401-CDP25-146 – Orla Kelly	SD-C401-CDP25-148 – Cronan Dooley	SD-C401-CDP25-149 – Áine Gallagher
SD-C401-CDP25-150 – Kedar Baratam	SD-C401-CDP25-153 – Isabel Arboleda	SD-C401-CDP25-157 – Zelda Cunningham
SD-C401-CDP25-161 – Rory Thynne	SD-C401-CDP25-166 – Elaine O'Hare	SD-C401-CDP25-167 – Sharon Carroll
SD-C401-CDP25-169 – John O'Shea	SD-C401-CDP25-170 – Kevin Donoghue	SD-C401-CDP25-171 – John O'Shea

SD-C401-CDP25-177 – Anand RAJAGOPALAN	SD-C401-CDP25-178 – NIranjana Rajagopalan	SD-C401-CDP25-182 – Terri Moloney
SD-C401-CDP25-183 – Kelley Dunleavy	SD-C401-CDP25-184 – Sean Young	SD-C401-CDP25-185 – Caroline Hogarty
SD-C401-CDP25-186 – Danijela Klopotan	SD-C401-CDP25-187 – Lakshyajit Baruah	SD-C401-CDP25-190 – Dara-Jane Ruane
SD-C401-CDP25-193 – Hazel Caffrey	SD-C401-CDP25-194 – Raymond Stallings	SD-C401-CDP25-197 – Simon Dowling
SD-C401-CDP25-200 – Sofia Alberty	SD-C401-CDP25-211 – jorgea rafferty	SD-C401-CDP25-214 – Maureen Young
SD-C401-CDP25-224 – John Brennan	SD-C401-CDP25-227 – Emma Gavin	SD-C401-CDP25-228 – Denise Collins
SD-C401-CDP25-229 – Margaret Dennehy	SD-C401-CDP25-230 – Lisa Breslin	SD-C401-CDP25-237 – marcus o'carroll
SD-C401-CDP25-246 – Catherine Kelly	SD-C401-CDP25-248 – Ciara O Carroll	SD-C401-CDP25-249 – Gavin Pacini
SD-C401-CDP25-263 – ASHAIL MAHARAJ	SD-C401-CDP25-270 – Ciara Murphy	SD-C401-CDP25-273 – Patrick Bradshaw
SD-C401-CDP25-282 – John Kelly	SD-C401-CDP25-285 – Trisha Duffy-Barber	SD-C401-CDP25-304 – Tom O' FGlynn
SD-C401-CDP25-306 – aoife rafter	SD-C401-CDP25-307 – David Francis	SD-C401-CDP25-308 – Michael Dwyer
SD-C401-CDP25-309 – Mario Ilha	SD-C401-CDP25-310 – Neasa Henry	SD-C401-CDP25-313 – Jennifer Harte

SD-C401-CDP25-318 – Fearghal Lawlor	SD-C401-CDP25-320 – Karl Meehan	SD-C401-CDP25-330 – Sarah McDermott
SD-C401-CDP25-331 – Hugh McKiernan	SD-C401-CDP25-334 – Kieron Byrne	SD-C401-CDP25-335 – ian mclaughlin
SD-C401-CDP25-339 – Alyson Brady	SD-C401-CDP25-340 – Dolores Donnelly	SD-C401-CDP25-341 – Catherine Lane
SD-C401-CDP25-345 – Eileen Sheahan-mclaughlin	SD-C401-CDP25-350 – Liam Byrne	SD-C401-CDP25-351 – Aoife Byrne
SD-C401-CDP25-352 – Derek Byrne	SD-C401-CDP25-353 – Carl Humphreys	SD-C401-CDP25-354 – Carmel Byrne
SD-C401-CDP25-356 – Susan Kavanagh	SD-C401-CDP25-358 – Katie Hynes	SD-C401-CDP25-359 – Shane Nestor
SD-C401-CDP25-364 – Stephen Mason	SD-C401-CDP25-366 – Divya Manhas	SD-C401-CDP25-372 – Kayleigh Fox
SD-C401-CDP25-378 – Joseph Fox	SD-C401-CDP25-381 – Valerie O'Neill	SD-C401-CDP25-384 – Miriam Cuesta Moratinos
SD-C401-CDP25-385 – Mary Maloney	SD-C401-CDP25-386 – Justyna Zajakala	SD-C401-CDP25-387 – Philip Kavanagh
SD-C401-CDP25-388 – Robert Maloney	SD-C401-CDP25-391 – Pat Lennon	SD-C401-CDP25-393 – Aisling Lennon
SD-C401-CDP25-395 – Fiona Wolfe	SD-C401-CDP25-397 – Brendan Lennon	SD-C401-CDP25-406 – Joe Whyte

SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-412 – Colette McParland	SD-C401-CDP25-413 – Vivek Soni
SD-C401-CDP25-414 – niall oneill	SD-C401-CDP25-425 – Claire Keogh	SD-C401-CDP25-426 – Aidan Brennan
SD-C401-CDP25-427 – John Murray	SD-C401-CDP25-429 – Stuart Campbell	SD-C401-CDP25-431 – Lorna Quinn
SD-C401-CDP25-434 – Katarzyna Czarzasta	SD-C401-CDP25-436 – Glenn Tubbert	SD-C401-CDP25-441 – Joanne Larkin
SD-C401-CDP25-443 – Three	SD-C401-CDP25-448 – Seun Ogunkunle	SD-C401-CDP25-450 – Adrienne Doherty
SD-C401-CDP25-451 – ken hawkins	SD-C401-CDP25-459 – Aderrig	SD-C401-CDP25-460 – Evans Kipchaui
SD-C401-CDP25-471 – Rafael Madrid	SD-C401-CDP25-476 – Emily Wykes	SD-C401-CDP25-480 – Joy Hearn
SD-C401-CDP25-482 – Maciej Zajakala	SD-C401-CDP25-499 – Fiona Dwyer	SD-C401-CDP25-506 – Neal Murphy
SD-C401-CDP25-534 – Julie Keane	SD-C401-CDP25-538 – emilian dackiewicz	SD-C401-CDP25-541 – Owen McCabe
SD-C401-CDP25-545 – Mairead McMahon	SD-C401-CDP25-550 – sakshi jain	SD-C401-CDP25-551 – xavier torne
SD-C401-CDP25-554 – Karishma Patel	SD-C401-CDP25-555 – Jennifer Swinburne	SD-C401-CDP25-571 – Murali Krishna Tummala
SD-C401-CDP25-576 – Magda Ghanim	SD-C401-CDP25-594 – Rupert Fuller	SD-C401-CDP25-598 – Darren Kenny

SD-C401-CDP25-600 – Valeria Luciane Okano Halila	SD-C401-CDP25-601 – Hayley McLoughlin	SD-C401-CDP25-603 – Loe Antonio de Souza Lobo
SD-C401-CDP25-612 – Niamh Power	SD-C401-CDP25-669 – CORMAC MC CARTHY	SD-C401-CDP25-671 – Conor Doyle
SD-C401-CDP25-679 – Joanne O'Flynn	SD-C401-CDP25-685 – Ronan Brannigan	SD-C401-CDP25-690 – eric neville
SD-C401-CDP25-695 – Sharon Holland	SD-C401-CDP25-699 – Veronica McCallum	SD-C401-CDP25-700 – Vijaykumar Jagadeesan
SD-C401-CDP25-712 – Neil Homan	SD-C401-CDP25-722 – Kristin Springer	SD-C401-CDP25-776 – Mary Whittle
SD-C401-CDP25-778 – Heather Martin Martin	SD-C401-CDP25-783 – Sarah Owen	SD-C401-CDP25-825 – Jennifer Merriman
SD-C401-CDP25-838 – Ray Barnes	SD-C401-CDP25-841 – David Kilgannon	SD-C401-CDP25-847 – Grace Lavery O'Reilly
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-921 – Oksana Abrosimova	SD-C401-CDP25-969 – Dermot McGreal
SD-C401-CDP25-973 – Fionnala O'Brien	SD-C401-CDP25-1046 – Matt Lavery-O'Reilly	SD-C401-CDP25-1052 – Maria Fitzgerald
SD-C401-CDP25-1053 – Mary Davis	SD-C401-CDP25-1056 – Office of Public Works	SD-C401-CDP25-1058 – Ram Vellore
SD-C401-CDP25-1062 – Shankar Getty	SD-C401-CDP25-1067 – Sivaram Muthiah	SD-C401-CDP25-1077 – AIMEE AHERN

SD-C401-CDP25-1083 – claire Levingstone	SD-C401-CDP25-1117 – Megan Fox	SD-C401-CDP25-1136 – Peter McCallum
SD-C401-CDP25-1138 – Velmathi Rajaram	SD-C401-CDP25-1149 – Daniel Kochanski	SD-C401-CDP25-1159 – David Whittle
SD-C401-CDP25-1160 – Ashleigh D'Arcy	SD-C401-CDP25-1167 – Inland Fisheries Ireland	SD-C401-CDP25-1174 – Aine Maguire
SD-C401-CDP25-1179 – Floriana Stomeo	SD-C401-CDP25-1184 – Louise Brogan	SD-C401-CDP25-1187 – Local Resident
SD-C401-CDP25-1190 – Chandrasekar Chinnathambi	SD-C401-CDP25-1193 – Priya Parameswaran	SD-C401-CDP25-1202 – Celine Kiernan
SD-C401-CDP25-1223 – Gok Raja	SD-C401-CDP25-1233 – Sarah Casey	SD-C401-CDP25-1237 – Aniket Jain
SD-C401-CDP25-1239 – Cllr. Helen Farrell	SD-C401-CDP25-1260 – David Kinsella	SD-C401-CDP25-1270 – Marcel Notenboom
SD-C401-CDP25-1271 – Karen Kinsella	SD-C401-CDP25-1305 – Geraldine Lavin	SD-C401-CDP25-1315 – E.M Hurley
SD-C401-CDP25-1325 – Siobhan Nolan	SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1361 – Katie Moore
SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1367 – Dinesh Kumar	SD-C401-CDP25-1375 – Office of the Planning Regulator

SD-C401-CDP25-1390 – Stephen T	SD-C401-CDP25-1417 – Gaurav Pradeep Taori	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1446 – Tanmay Pande
SD-C401-CDP25-1450 – Edina Almasi	SD-C401-CDP25-1459 – Fiona Morrissey Halovanić	SD-C401-CDP25-1462 – Tessa Curran
SD-C401-CDP25-1464 – Xiaohong Zhang	SD-C401-CDP25-1470 – Achal Desai	SD-C401-CDP25-1475 – Patrick Brodie
SD-C401-CDP25-1507 – Karina ODonnell	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1522 – Aleksandra Dolhy
SD-C401-CDP25-1523 – Kevin Farrell	SD-C401-CDP25-1525 – Gary Connolly	SD-C401-CDP25-1532 – John Gobbett
SD-C401-CDP25-1539 – Stephen Little and Associates	SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1592 – John O'Brien
SD-C401-CDP25-1597 – Cllr Vicki Casserly	SD-C401-CDP25-1608 – Manami Greene	SD-C401-CDP25-1613 – Fintan Tait
SD-C401-CDP25-1618 – Paddy Keating	SD-C401-CDP25-1643 – Tara Ryan	SD-C401-CDP25-1655 – LIONA O'TOOLE
SD-C401-CDP25-1700 – STANLEY PAUL BLESSING WILLIAM	SD-C401-CDP25-1705 – Kirill Priadko	SD-C401-CDP25-1709 – Daniel McCartney

SD-C401-CDP25-1710 – Ruth Curran	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1727 – Ajai Govind Govindan
SD-C401-CDP25-1741 – Ben Healy	SD-C401-CDP25-1760 – Laura Doyle	SD-C401-CDP25-1768 – Emlin Jeyakkodi
SD-C401-CDP25-1800 – Anne Graham	SD-C401-CDP25-2001 – Ben O Byrne	SD-C401-CDP25-2324 – Florrie Dowling
SD-C401-CDP25-2432 – Katie Murnaghan		

Summary	CE Response
A large volume of submissions were received in respect of the proposed rezoning and Specific Local Objective (SLO) for lands to the west of Adamstown SDZ (Adamstown SDZ West, Variation Amendment Site 2). Many submissions were identical or near-identical in content, including a significant number of standardised submissions and repeat representations from residents across the wider Lucan–Adamstown area. The submissions have therefore been summarised thematically below for ease of reference and response. Overall, submissions predominantly object to the proposed rezoning and associated SLO on the grounds of infrastructure capacity, traffic and public transport constraints, cumulative overdevelopment, environmental and green space impacts, and the timing and sequencing	This amendment is in relation to the designation of lands at the Adamstown SDZ West, that are currently zoned Objective RU to a RES-N under Variation No. 2 of the South Dublin County Development Plan 2022-2028. The rezoning includes an associated SLO, numbered as There is an SLO attached to the subject lands, SLO - CS7 SLO4, is states the following: 1. Development may not commence until DART+ South West has commenced construction. 2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not

of development relative to the delivery of supporting infrastructure, with particular emphasis on the build-out status of the Adamstown and Clonburris Strategic Development Zones and the delivery of DART+ South West. A consistent theme across submissions is the contention that Lucan and Adamstown have already accommodated disproportionate levels of residential development, with significant quantum of housing delivered and permitted within Adamstown and Clonburris SDZs that remains incomplete. Submissions argue that the rezoning of additional lands within Adamstown SDZ West would further exacerbate existing pressures on roads, public transport, schools, healthcare, utilities, community facilities and green spaces, and would negatively impact residential amenity and quality of life. In response to these concerns, the proposed Specific Local Objective introduces a plan-led and infrastructure-focused framework for the lands, requiring that development may not commence until DART+ South West has commenced construction, and that future development is guided by both an infrastructure masterplan—agreed in advance with Uisce Éireann—and a masterplan integrated with the Adamstown SDZ Planning Scheme. This masterplan must take account of cumulative development potential and, inter alia, provide for the retention and enhancement of historic hedgerows, undertake a Social Infrastructure Audit, a Transport and Traffic	compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. 3. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: a. Retention and enhancement of the east-west hedgerow in the northern part of the site as recorded on 1st Edition OS maps, unless required for wider movement needs, b. A Social Infrastructure Audit and provision within development proposals to address any needs identified, c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, d. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and e. Provision for future infrastructure and access connections to lands to the south and west, including reservation fora future vehicular bridge over the railway line, unless determined otherwise in writing by the planning authority. The site is located directly west of Adamstown SDZ, located to the south of Stonewall variation site. Note, the SDA will adjoin these lands as proposed under amended no. 17. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in

Assessment, and a Public Open Space Audit, and make provision for future infrastructure and access connections, including safeguarding for a potential future vehicular bridge over the railway line. Collectively, these measures are intended to address the substantive issues raised in submissions by ensuring that any future development of Adamstown SDZ West is phased, coordinated and supported by appropriate infrastructure and community provision. **Overdevelopment – Lucan Wide Cumulative Impact** Overdevelopment and disproportionate levels of development have been flagged as issues throughout the consultation submission received by SDCC. Key issues raised include: Disproportionate levels of zonings in certain areas (e.g. Lucan) Certain sites may be omitted from the proposed variation (e.g. Finnstown, Foxhunter, St. Edmunsbury etc.) Further to this, incorrect baseline figures and analysis have been suggested in submissions and used to undertake capacity audit . Additionally, it is also stated that adequate zoned land already exists within the county to meet current demand, contrary to capacity audit. The proposed variation is also suggested to undermine the SDCC own development plan. The topic of 'Overdevelopment' is dealt with in each of the various variation sites throughout this report,	the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines. required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review.

however, in a broader sense, the wider context is dealt with in some detail below to allow for wider consideration, notably in the comparative context of Lucan and Waterford, as well as how sites were selected. Submissions also raise consistent and strongly expressed concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by rapid population growth, disproportionate housing delivery, and inadequate supporting infrastructure. Residents emphasise that Lucan has undergone significant expansion over several decades, with population growth increasing from a small village of a few thousand in the 1980s, to approximately 15,000 by 1990, 57,000 by 2016, and circa 65,000 by 2026, largely driven by continuous residential development. This growth is frequently compared to that of a city, with Lucan now described as having a population broadly comparable to Waterford City, but without appropriate infrastructure, services or facilities. Concerns are further raised regarding density, noting that Lucan accommodates a similar population within a significantly smaller land area, resulting in a markedly more intense urban form. A key theme is the perception that Lucan and Adamstown have absorbed a disproportionate share of housing development within South Dublin,	Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. **Overdevelopment – Lucan Wide Cumulative Impact** Submissions raise consistent and strongly held concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by cumulative population growth, a concentration of housing delivery, and infrastructure provision not keeping pace with development. The Planning Authority acknowledges that the Lucan–Adamstown area has experienced significant and sustained population growth over several decades, evolving from a

including the delivery of two Strategic Development Zones (Adamstown and Clonburris), with submissions highlighting that this is unique nationally. It is also noted that 64% of lands identified for additional development under Proposed Variation No. 2 are located within the Lucan–Adamstown area, reinforcing concerns regarding imbalanced spatial distribution of growth. The cumulative pipeline of development is considered substantial, with thousands of units already delivered and significant additional capacity (including SDZ build-out lands and proposed rezonings) yet to be realised, potentially resulting in a further major increase in population. Submissions consistently assert that this level of growth has outpaced the delivery of critical infrastructure and services, resulting in existing deficits across multiple sectors. Transport infrastructure is identified as a primary constraint, with references to chronic congestion on the N4, Newcastle Road, Adamstown Road, R120 and within Lucan Village, where traffic is described as persistent throughout the day rather than limited to peak periods. Public transport is considered insufficient and unreliable, with overcrowded bus services, lack of rail or Luas connectivity, and the absence of a direct link to Dublin Airport highlighted as key failings. The projected growth associated with further rezonings is considered likely to exacerbate	small settlement into a major suburban population centre within the Dublin Metropolitan Area. The area forms part of a key growth corridor within the Dublin Metropolitan Area, where the availability of suitable and serviceable lands, including those proximate to existing and planned transport infrastructure, has been identified at regional and national level as critical to meeting housing demand. A central concern relates to the cumulative impact of development, with submissions asserting that population growth has outpaced the provision of critical infrastructure. Concerns relating to congestion on key transport routes, public transport capacity, and pressure on schools, childcare, healthcare and community facilities are recognised as part of the cumulative impact of growth in the area. Specific issues include traffic congestion on key routes such as the N4, Adamstown Road, Newcastle Road and within Lucan Village, alongside constraints in public transport capacity, including overcrowded bus services and reliance on future rail interventions. Submissions also highlight pressure on social infrastructure, including school places, childcare provision, healthcare services and community facilities, with references to oversubscription and capacity constraints. In addition, concerns are raised regarding the loss of greenfield lands and high-amenity areas, which are viewed as important for environmental quality, recreation and biodiversity. Submissions also raise concerns that a disproportionate quantum of lands identified under the proposed variation are located within the Lucan–Adamstown area. The Planning Authority acknowledges the perception that a disproportionate share of future development is directed to the Lucan area; however, the identification of lands is not

car dependency, congestion and associated environmental impacts. Similarly, significant pressure is identified on social infrastructure, including school capacity, childcare provision and healthcare services. Submissions refer to school place shortages, oversubscribed facilities, and limited GP availability, with many practices reportedly not accepting new patients. Community, recreational and sports facilities are also considered deficient relative to the size of the population, with recent examples cited of facilities reaching capacity shortly after opening. This is compounded by concerns regarding utilities and drainage infrastructure, with suggestions that some systems are already approaching or exceeding operational capacity. A further critical issue is the loss of remaining greenfield and high-amenity lands, particularly at locations such as St. Edmundsbury, Finnstown and other proposed sites. These lands are described as important for biodiversity, landscape character, recreation, and climate resilience, as well as forming part of the wider Liffey Valley green infrastructure network. Their rezoning is viewed as contributing to the progressive erosion of natural and environmental assets in an area already experiencing extensive urbanisation. Overall, the issue of overdevelopment is framed in terms of cumulative impact, with	based on geographic distribution, but on a rigorous, evidence-based assessment of suitability, infrastructure capacity, accessibility and alignment with national planning policy. In this regard, the availability of suitably located lands within the Dublin Metropolitan Area, including in Lucan–Adamstown, is a key factor in accommodating projected population growth. Submissions frequently draw comparisons with Waterford City to illustrate the scale of population growth; however, the Planning Authority considers that such comparisons require careful contextualisation. Waterford is designated under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) as a Regional City of Scale, with a defined Metropolitan Area Strategic Plan (MASP) and a clear national policy objective to achieve significant population growth supported by targeted investment in infrastructure, regeneration and metropolitan-scale services. By comparison, the Lucan–Adamstown–Palmerstown area forms part of the wider Dublin Metropolitan Area, where growth is planned and distributed across the region in accordance with national housing targets and strategic planning policy, and where the availability of land and proximity to transport corridors are key determinants in shaping development patterns. The revised NPF provides for substantial population growth within the Eastern and Midland Region, reflecting Dublin's role as the primary engine of national population growth, while also supporting higher relative growth in regional cities to achieve balanced regional development. In this context, the Planning Authority considers that the proposed variation responds to statutory requirements under the NPF

submissions arguing that continued rezoning, in advance of infrastructure delivery, represents a “housing-led” rather than “infrastructure-led” approach. The prevailing concern is that further development will intensify existing deficits, leading to declines in quality of life, increased congestion and environmental pressure, and an erosion of local character and community cohesion, unless balanced by timely and proportionate investment in infrastructure and services. **Overdevelopment, Housing and Density** A substantial proportion of submissions raise concerns about housing growth in the Lucan–Adamstown area; however, housing is not generally addressed as a discrete policy issue in terms of housing mix, tenure, affordability or specific delivery mechanisms. Instead, references to housing arise almost exclusively in the context of scale, pace and cumulative impact, with submissions framing residential development primarily as a driver of infrastructure pressure, congestion and environmental stress rather than as a response to identified housing policy needs. In particular, submissions relating to Adamstown SDZ West emphasise that the area has already contributed significantly to county and regional housing delivery through the Adamstown and Clonburris Strategic Development Zones, both of which continue to build	and associated Section 28 Guidelines, which mandate that sufficient land be identified to meet increased and accelerated housing demand. Submissions question the necessity of proposed rezonings, with reference to the housing capacity identified in the South Dublin County Development Plan 2022–2028. While it is acknowledged that the Development Plan identified a substantial quantum of zoned land, subsequent to its adoption there have been significant changes in national planning policy, including the revised NPF and associated Section 28 Ministerial Guidelines. These guidelines require planning authorities to review their Core Strategy and zoning provisions to ensure alignment with updated housing targets and delivery requirements. In response, the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. This process included engagement with key internal departments and relevant infrastructure providers to ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development. The sites identified under the proposed variation were selected on the basis of this evidence-based assessment, having regard to their proximity to existing and planned infrastructure, their capacity to support appropriate densities, and their alignment with compact growth and transport-oriented development principles. Importantly, future development is not unstructured but will be coordinated through the application of site-specific Specific Local Objectives (SLOs) and the Development Plan framework. Zoning represents a strategic first step and does not, in itself, facilitate immediate development. The purpose of the Specific Local Objective is to provide clear site-specific

out with substantial residential capacity yet to be completed or occupied. From this perspective, further zoning for residential use is viewed as compounding existing pressures rather than addressing unmet housing demand in a balanced or spatially equitable manner. Issues of density are similarly raised at a strategic and cumulative level rather than in relation to specific design scenarios or typologies. Submissions rarely quantify or prescribe acceptable density thresholds; instead, they express concern that any additional density within Adamstown SDZ West, when combined with existing and permitted development across Adamstown and Clonburris, would intensify traffic congestion, overstretch schools, healthcare and utilities, and further reduce access to open space. A recurring narrative is that density has increased incrementally across multiple phases and sites without a perceived commensurate increase in infrastructure capacity, leading to a gradual erosion of residential amenity and quality of life. Density is therefore characterised less as an urban design issue and more as a proxy for cumulative population pressure, with submitters seeking reassurances that intensification will not proceed in advance of demonstrable infrastructure and service upgrades. The theme of overdevelopment is one of the most strongly and consistently articulated issues across	policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. In this way, SLOs provide a structured mechanism to ensure that development is aligned with available or planned infrastructure and proceeds in a coordinated manner. Furthermore, the SLOs ensure that development proposals are subject to detailed assessment and coordination, thereby avoiding piecemeal or uncoordinated development and ensuring that infrastructure requirements, including transport demand, are clearly identified and addressed at the appropriate stage. The Council has also delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. These investments demonstrate the Council's ongoing commitment to aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone (SDZ) framework represents best practice in the coordinated delivery of large-scale residential communities. These areas have been planned

submissions. This concern is framed explicitly as a cumulative outcome of successive rezonings, SDZ phases and infill developments across Lucan, rather than as an objection to any single site in isolation. Many submissions describe Lucan as having reached, or exceeded, its effective carrying capacity, citing persistent congestion, difficulty accessing schools and healthcare, shortages of recreational and community facilities, and loss of remaining green and transitional lands. Within this context, Adamstown SDZ West is viewed as part of a broader pattern of continued residential expansion in an area already accommodating a high concentration of development relative to other parts of the county. Submissions argue that further development would reinforce spatial imbalance, exacerbate existing deficiencies and undermine efforts to deliver sustainable, plan-led growth, rather than contributing positively to long-term settlement structure. **Zoning and Phasing** A large volume of submissions object to the principle of further residential zoning within, or in close proximity to the, Adamstown SDZ and the wider Lucan area. Submissions argue that Lucan has already absorbed a disproportionate share of county and regional housing growth through Adamstown and Clonburris SDZs, both of which remain incomplete, however build our/delivery continues. It is asserted in many submissions related to Adamstown SDZ West, as well as other Lucan area	and phased to provide for the delivery of community facilities, transport infrastructure and open space in tandem with population growth. This approach reflects a coordinated, urban design-led model of development, promoting the efficient use of land and supporting transport-oriented development. The experience of the SDZs has informed the Council's approach to future growth, and the Planning Authority will continue to apply and reflect on the lessons learned to ensure that development is delivered in a coordinated and sustainable manner. The delivery of infrastructure such as DART+ South West, BusConnects and active travel networks provides the basis for improved sustainable mobility within the wider area. It is recognised that public transport service provision and service levels are a matter for the National Transport Authority (NTA) and relevant operators. The Planning Authority will continue to engage with the NTA and other stakeholders to ensure that future transport demand arising from population growth, including that facilitated by these rezonings, is planned for and responded to in a coordinated manner, aligned with national and regional transport strategies. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated

related submissions, that further rezoning is premature in the absence of confirmed infrastructure capacity audit/availability, and that existing zoned lands (such as the SDZs) should be prioritised for development before additional lands are rezoned. Further to this, a number of submissions argue that the proposed zoning and phasing approach is inconsistent with national and local planning policy, particularly in respect of infrastructure-led development, compact growth and sustainable mobility, as outlined in the National Planning Framework. Submissions state that reliance on future infrastructure delivery undermines the plan-led system and seek clearer alignment between zoning decisions and deliverable infrastructure timelines. *Phasing* Phasing is one of the most frequently and consistently raised issues across submissions relating to Adamstown SDZ West. Submissions commonly argue that the sequencing of development is as important as the quantum of development proposed and that inadequately controlled phasing has the potential to exacerbate existing deficiencies within the Lucan–Adamstown area. A dominant concern is that additional residential development would proceed ahead of, or significantly out of step with, the delivery of supporting infrastructure, thereby repeating what submitters describe as historic	district and neighbourhood transport assessments. This will inform detailed engagement with both elected members and national transport agencies on future transport options and potential projects. This study will develop a transport strategy. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. While the cumulative nature of development in the Lucan–Adamstown area is acknowledged, it is managed through ongoing coordination of land use, infrastructure planning and delivery. In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools, health care, and transport services by relevant agencies. As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. The Planning

planning failures experienced during earlier phases of the Adamstown SDZ. A central feature of submissions is objection to the linkage between development commencement and the commencement of works on strategic infrastructure projects, most notably DART+ South West. Many submissions assert that the commencement of construction does not equate to the availability of additional transport capacity and argue that allowing residential development to proceed on this basis would result in an extended period during which population growth substantially outpaces transport provision. In this context, submissions express concern that existing rail and bus services—already described as operating at or beyond capacity—would be subjected to further strain while major infrastructure works are ongoing rather than completed. Closely related to this is a strong and recurring call for an explicit "infrastructure-first" approach to phasing. Submissions repeatedly state that residential development should not commence or be occupied until infrastructure is fully delivered and operational, and demonstrably capable of accommodating additional population. This approach is applied not only to transport infrastructure but also to community and social facilities, including schools, healthcare, childcare, leisure facilities and parks, as well as utilities and services, particularly water and wastewater infrastructure. Many	Authority will continue to engage with relevant agencies to align future development with the timely delivery of supporting infrastructure. Overall, the concerns raised regarding overdevelopment, infrastructure capacity and quality of life are acknowledged. However, the Planning Authority is satisfied that the proposed variation is grounded in national policy, statutory requirements and a coordinated development framework. The approach seeks to balance the need to accommodate ongoing population growth within the Dublin Metropolitan Area—supported by the availability of suitable lands—with the delivery of infrastructure, sustainable transport integration and the principles of compact, transit-oriented development, while contributing to broader national objectives of balanced regional growth. **Overdevelopment, Housing, and Density** The Council notes the concerns raised in submissions regarding housing growth, density and perceptions of overdevelopment within the Lucan–Adamstown area and, in particular, in relation to Adamstown SDZ West. The Planning Authority acknowledges that Adamstown and Clonburris have made, and continue to make, a substantial contribution to meeting housing need at county, regional and metropolitan level, and that a significant quantum of residential development remains under construction or yet to be delivered within these SDZs. From a policy perspective, the Council wishes to clarify that housing and density are assessed within a national, regional and local planning framework rather than on an ad-hoc or site-specific basis. Attention is drawn to the Compact Settlement Guidelines (Section 28 Guidelines) issued by the Department of Housing, Local Government and Heritage, which set out clear parameters for appropriate residential density

submissions reference perceived capacity constraints at existing network elements and express concern that cumulative development across Adamstown SDZ West, Adamstown SDZ and Clonburris SDZ has not been sufficiently sequenced relative to infrastructure investment. Submissions also highlight concerns about the cumulative impact of phased development. Rather than viewing Adamstown SDZ West in isolation, submitters frame phasing as a wider spatial and temporal issue, arguing that successive waves of development across multiple sites have collectively intensified pressures on transport networks, public services and environmental assets. In this regard, submissions often contend that further rezoning and phased development should be deferred until the Adamstown and Clonburris SDZs are substantially built out and serviced, with infrastructure deficits addressed and lessons from earlier development phases demonstrably incorporated. A further concern relates to the perceived lack of enforceability and clarity around phasing mechanisms. Some submissions argue that phasing conditions based on project commencement, policy intent or future assessments lack certainty for existing residents and do not provide sufficient assurance that infrastructure delivery will keep pace with residential occupation. This is particularly evident in submissions recalling earlier Adamstown	having regard to a site's location, accessibility, and proximity to existing and planned public transport and services. These guidelines provide density ranges for metropolitan and suburban locations and require Local Authorities to assess development intensity in a manner that supports compact growth and the efficient use of serviced land. The application of these national guidelines is undertaken in tandem with the policies and objectives of the South Dublin County Development Plan, which translate national density principles into a local policy context. In this context, the rezoning of lands at Adamstown West does not predetermine a specific density, housing mix or built form. Rather, it identifies the lands as suitable for residential use in principle, subject to compliance with national density guidance, Development Plan objectives and detailed assessment at planning application stage. Concerns raised regarding cumulative impacts are recognised, and it is for this reason that the proposed zoning is accompanied by a robust Specific Local Objective (SLO) which expressly requires a masterplan-led approach, informed by the cumulative development potential of the lands and the wider Adamstown area. The SLO requires the preparation of a Social Infrastructure Audit, Transport and Traffic Assessment and Public Open Space Audit, ensuring that population growth arising from any future development is assessed holistically rather than in isolation. The Council also notes submissions characterising Adamstown and Lucan as having exceeded their carrying capacity. While these concerns are acknowledged, the Planning Authority considers that such matters must be assessed against strategic evidence at county and regional level. National policy, including the National Planning Framework,

phases where housing delivery is perceived to have significantly preceded the provision of community, social and transport infrastructure, resulting in prolonged periods of interim pressure. Overall, submissions present phasing as a critical determinant of whether additional development at Adamstown SDZ West would be sustainable. The issue is framed not as opposition to development in principle, but as concern that without stricter sequencing tied to operational infrastructure capacity, further development would compound existing pressures, undermine confidence in the plan-led system, and repeat infrastructure-lag outcomes experienced previously within the SDZ. **Transport** ***Traffic and Roads and Parking*** Traffic, road capacity and parking issues form one of the most dominant and consistently raised themes across submissions relating to the proposed zoning of Adamstown SDZ West. These matters are generally framed as cumulative impacts arising from the scale and pace of residential development already delivered and permitted across Adamstown, Clonburris and the wider Lucan area, rather than as site-specific concerns in isolation. Submissions repeatedly describe the local and strategic road network as operating at or beyond practical capacity, with congestion reported not only	explicitly directs growth to established metropolitan areas with existing and planned infrastructure, rather than dispersing development to less sustainable locations. The lands at Adamstown SDZ West are located adjacent to an existing SDZ with a defined planning scheme, a structured street and open space network, and established community and social infrastructure either delivered or provided for. In this regard, the proposed zoning supports orderly, sequential and plan-led growth rather than piecemeal expansion. Crucially, the SLO provides that development cannot commence until DART+ South West has commenced construction, and requires an infrastructure masterplan, agreed in advance with Uisce Éireann, to demonstrate that water and wastewater upgrades can serve the subject lands without compromising the capacity of surrounding zoned lands, including Clonburris SDZ. These provisions are intended to directly address concerns that density or additional housing would proceed in advance of a timeline for the supporting infrastructure and to ensure that cumulative impacts are properly managed. In summary, while the Planning Authority acknowledges the perception of overdevelopment or overconcentration expressed in submissions, it considers that the proposed zoning of Adamstown SDZ West, when read in conjunction with the Specific Local Objective, the County Development Plan and the Compact Settlement Guidelines, provides a balanced and proportionate response to the Section 28 Guidelines on National Planning Framework implementation. The approach ensures that housing delivery is aligned with national compact growth policy, that density is assessed objectively based on location and accessibility, and that development can only proceed in a controlled manner once appropriate infrastructure, services and amenity provision are addressed through detailed masterplanning and assessment.

during peak commuter periods but extending throughout much of the day. Roads and junctions most frequently referenced include Lucan Village, Newcastle Road, Adamstown Boulevard, Celbridge Road, the N4 corridor, and local distributor and access roads serving Adamstown and adjacent residential estates. Many submissions describe chronic delays, prolonged queuing, difficulty exiting estates, and unreliable journey times which are perceived to have worsened incrementally as successive development phases have been occupied. A common concern raised is the prevalence of rat-running through existing residential estates, as drivers seek to avoid congested main routes. This is described as giving rise to increased traffic volumes on roads not designed to accommodate such flows, leading to heightened road safety risks, particularly for pedestrians, cyclists and school-going children. Several submissions reference near misses, reduced footpath safety, and cyclist vulnerability, with these issues framed as incompatible with the creation of safe, family-oriented residential environments. Submissions also raise concerns regarding emergency access, stating that narrow streets, on-street parking and congestion can impede access for ambulances, fire services and other emergency vehicles. This issue is often linked to both traffic volume and parking pressures and is cited as a tangible indicator that the road network is under strain beyond its intended capacity. Overall,	**Zoning and Phasing** The Council notes the concerns raised in submissions regarding the principle, scale and distribution of additional residential zoning, particularly within the Lucan–Adamstown area, and the perceived premature nature of further land release in advance of infrastructure delivery. Submissions highlight that a significant proportion of lands identified under the proposed variation are located within the Lucan Electoral Area and argue that this represents an overconcentration of development relative to its geographic extent, particularly given the ongoing build-out of the Adamstown and Clonburris SDZs. The Planning Authority acknowledges these concerns; however, it is emphasised that the identification of lands for rezoning is not based on a pro-rata or geographic distribution, but on a rigorous, evidence-based assessment of suitability informed by national policy, infrastructure capacity, and settlement strategy objectives. In this regard, the proposed variation responds to updated requirements under the revised National Planning Framework (NPF) and associated Section 28 Guidelines, which require planning authorities to ensure that sufficient, deliverable land is available to meet increased housing targets. A comprehensive capacity audit was undertaken to support this process, considering site constraints, infrastructure availability, accessibility to services and public transport, and the ability of lands to support compact growth and transport-oriented development. Engagement with key stakeholders, including the National Transport Authority and Uisce Éireann, informed this assessment. The lands identified, including those within the Lucan–Adamstown area, represent some of the most suitable, accessible and serviceable locations within the County, particularly where they can integrate with the established

submissions contend that without major road upgrades or network interventions, further residential zoning at Adamstown SDZ West would significantly worsen these conditions at both local and wider network levels. Parking concerns are raised frequently as a secondary but closely related issue, particularly in the context of higher-density residential development. Submissions state that existing developments within Adamstown and surrounding areas are already experiencing parking deficiencies, which manifest as overspill parking onto surrounding streets, obstruction of footpaths and cycle lanes, informal parking on green areas and increased conflict between residents. These issues are often highlighted as evidence that infrastructure provision has not kept pace with residential occupation. Rather than treating parking as a standalone objection, submissions commonly present it as part of a broader pattern of cumulative transport and infrastructure stress. Parking pressure is described as compounding road safety issues, restricting visibility at junctions, worsening pedestrian and cyclist conditions, and further limiting emergency access. There is concern that additional development at Adamstown SDZ West would amplify these problems unless parking provision, enforcement and wider transport alternatives are demonstrably adequate.	urban framework and benefit from existing and planned infrastructure investment. As such, the concentration of lands reflects planning suitability and sustainable development opportunity, rather than disproportionate allocation. Concerns regarding the prioritisation of existing zoned lands and the timing of development are also noted. The Planning Authority emphasises that the presence of undeveloped lands within SDZs does not preclude the identification of additional lands where required to meet revised growth targets and ensure continuity of housing supply over the lifetime of the Development Plan and beyond. The proposed zoning is therefore part of a strategic, plan-led approach to long-term growth, rather than ad hoc or speculative expansion. Importantly, the proposed zoning is expressly conditioned through the accompanying Specific Local Objective (SLO), which provides a robust framework to ensure that development is coordinated and in tandem with infrastructure planning and delivery. The SLO establishes clear preconditions, including: • A requirement that development may not commence until DART+ South West, or an equivalent rail service, has commenced construction or operation, thereby linking development to strategic public transport investment; • The preparation of an infrastructure masterplan, to be agreed with Uisce Éireann, demonstrating adequate water and wastewater capacity and safeguarding the servicing of surrounding lands, including Clonburris SDZ; • The preparation and approval of a comprehensive masterplan, integrated with the Adamstown SDZ Planning Scheme, addressing cumulative impacts and including a Social

Across submissions, traffic, roads and parking are therefore framed as interlinked symptoms of over-intensification in an area that residents perceive to be already operating at or near its functional limits. The prevailing view expressed is that additional residential development would materially exacerbate congestion, safety risks and amenity loss unless accompanied by significant upgrades to the road network, effective management of parking provision, and tangible improvements in transport capacity. **Public Transport and Active Travel** Public transport capacity, reliability and integration are repeatedly identified in submissions as critical constraints affecting Adamstown SDZ West and the wider Lucan–Adamstown area. Submissions consistently state that existing bus and rail services are operating at or beyond capacity, particularly during peak commuting periods. Frequent reference is made to overcrowded buses passing stops, inconsistent service frequencies and what are described as “ghost buses,” where scheduled services fail to materialise. Rail services serving Adamstown Station are similarly described as operating at full capacity in peak periods, with submitters expressing concern that any further population increase would place unsustainable pressure on the existing network.	Infrastructure Audit, Transport and Traffic Assessment, and Public Open Space Audit; and • Provision for coordinated access, movement and infrastructure connections, including long-term strategic linkages. These requirements ensure that zoning does not translate into immediate development pressure as development can only proceed in accordance with the SLO requirements. The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. This approach is consistent with national policy, which recognises that zoning is determined at plan stage, with phasing, sequencing and delivery mechanisms addressed through detailed objectives and development management processes. The Council further considers that the SLO strengthens alignment with infrastructure-led principles. By linking development to demonstrable progress in transport and utilities infrastructure, and requiring comprehensive masterplanning in advance of any application, the SLO ensures that development proceeds in tandem with the planning and delivery of supporting infrastructure. In this context, the role of the Development Plan is to establish a policy framework for the coordinated delivery of development and infrastructure, while recognising that detailed capacity, timing and

A significant number of submissions express dissatisfaction with the outcomes of BusConnects to date in the area. While acknowledging the intention of the programme, submissions argue that route changes have resulted in reduced coverage for certain neighbourhoods, increased interchange requirements, and limited improvement in capacity or reliability. In this context, the extension of certain bus routes through Adamstown is cited as problematic, with submitters stating that buses often arrive in Lucan already full, leaving little or no capacity for existing residents. Pressure on Adamstown Railway Station is a recurring theme, with submissions highlighting concerns about increased demand arising from additional residential zoning in Adamstown SDZ West. Many submissions argue that station access, platform capacity and onward services are already constrained, and that further development would exacerbate congestion both at the station and on surrounding roads due to park-and-ride or drop-off activity. The absence of a direct public transport connection to Dublin Airport is frequently highlighted as evidence of a broader strategic gap in transport provision for an area of this scale and population. A particularly strong and consistent objection relates to the phasing of development relative to DART+ South West. While submissions generally welcome DART+ SW in principle, many express opposition to	mitigation measures are determined and verified through the planning application process. In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes and the delivery of schools and community facilities by relevant agencies. Accordingly, cumulative assessment is most robust at defined points in time where these variables are known and can be verified and will inform both masterplanning and subsequent planning decisions. This approach does not defer consideration of cumulative impacts but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information at defined points in time. Furthermore, the zoning of lands represents a necessary first step in enabling infrastructure planning, as it establishes the scale of growth and population required to inform investment decisions by the Council and external infrastructure providers. In summary, while concerns regarding overconcentration, zoning quantum and infrastructure capacity are acknowledged, the Planning Authority is satisfied that the proposed zoning and SLO approach represents a balanced, policy-aligned and evidence-based response to national housing requirements. The combination of the Development Plan framework, the capacity audit, and the enforceable provisions of the Specific Local Objective ensures that future development will be

allowing residential development to proceed on the basis of the commencement of construction rather than the completion and operation of the scheme. Submissions argue that this approach would result in a prolonged interim period where population growth significantly outpaces transport capacity, leading to worsening congestion, increased car dependency and unsustainable travel patterns. This concern is often framed in the context of past experience, where transport infrastructure is perceived to have followed residential occupation with considerable delay. Iarnród Éireann acknowledges the significant population growth in South Dublin County and the associated pressure this places on infrastructure, particularly public transport, in the context of future housing targets to 2034 and 2040. The submission highlights the importance of aligning development with transport capacity, noting that Specific Local Objectives (SLOs) linking development at Finnstown Castle and Adamstown SDZ West to the commencement of DART+ South West are appropriate mechanisms to manage growth. Iarnród Éireann emphasises the requirement for Transport and Traffic Assessments to evaluate impacts and identify mitigation measures for proposed developments. It also stresses the need to protect the railway corridor, particularly for lands adjoining the rail line, to ensure that future upgrades and expansion of rail infrastructure are not	plan-led and infrastructure-supported, consistent with the principles of proper planning and sustainable development. **Transport (Traffic and Roads, Public Transport, Active Travel and Parking)** The Council has reviewed submissions relating to transport, including traffic, public transport capacity, active travel and parking, and has considered these issues in the context of the Adamstown SDZ Planning Scheme, the County Development Plan 2022–2028, and national policy promoting compact growth and sustainable mobility. National planning and transport policy, including the National Planning Framework, National Development Plan and National Sustainable Mobility Policy, establishes a clear direction towards reducing reliance on the private car and promoting more sustainable travel patterns. This is reflected in the “Avoid–Shift–Improve” framework, which seeks to reduce the need to travel, shift trips to public transport and active travel, and improve transport efficiency. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. For Adamstown West, the site benefits from a well-established and largely implemented transport framework, which is to be extended in a structured and plan-led manner through the proposed Specific Local Objective (SLO). Adamstown SDZ provides future residents the opportunity to access the recreational amenities in Tandy Lane and

constrained by development. Overall, the submission supports a transport-led approach to development, ensuring that infrastructure provision and safeguarding measures align with long-term rail investment. The National Transport Authority (NTA) has also provided a detailed submission in respect of Adamstown SDZ West, indicating that the site is well-positioned in terms of public transport accessibility. The NTA advises that, once the necessary road infrastructure is in place, the lands are intended to be served by the C2 bus route, with approximately 8 peak-hour services, and are located in close proximity to Adamstown Station, which provides circa 4 rail services to the City Centre during the AM peak. The submission further highlights that the site is contiguous with the existing built-up area and will benefit from the established range of services within Adamstown SDZ, including retail, educational and community facilities. It is also noted that portions of the lands already demonstrate a medium-high level of accessibility under Public Transport Accessibility Level (PTAL) analysis. Overall, the NTA considers that the development of these lands aligns with the principle of consolidated, transport-oriented growth, supporting the delivery of housing in locations that are served by existing and planned public transport infrastructure	Airlie Park, the Adamstown District Centre and planned Adamstown civic uses. A central element of the Council's response is that future development at Adamstown SDZ West will be subject to a robust SLO, requiring a masterplan-led approach and a Transport and Traffic Assessment, ensuring that transport impacts, infrastructure capacity and cumulative effects with Adamstown and Clonburris SDZs are comprehensively assessed and mitigated prior to development proceeding. <u>Traffic and Roads</u> The Council acknowledges concerns regarding congestion and capacity on the wider road network. The Planning Authority emphasises that zoning does not predetermine access or traffic levels, which will instead be addressed through the SLO-led masterplanning process and a Transport and Traffic Assessment, ensuring protection of local road function, and integration with the wider network in line with the Adamstown SDZ movement framework and DMURS principles. Issues are being addressed at both local and strategic levels through ongoing engagement with the NTA and TII, the Western Transport Study, and the six-year Roads Programme, which provide for road improvements, junction upgrades and safety interventions. The SLO ensures that development will not proceed in a piecemeal manner, requiring: • A Transport and Traffic Assessment addressing cumulative impacts on the network; • Integration with the existing Adamstown SDZ road hierarchy; and

Active travel is referenced primarily in relation to road safety, existing usage patterns and the impact of increased traffic. Submissions note that a number of local routes are currently used extensively by pedestrians and cyclists for everyday journeys, school access and recreation. These routes are often characterised as informal, low-traffic or constrained roads which, according to submissions, provide a relatively safe environment in the absence of high traffic volumes. Concern is expressed that increased vehicular traffic associated with further residential development would undermine safety and deter walking and cycling unless segregated and high-quality active travel infrastructure is delivered in advance. Several submissions link active travel concerns directly to public transport capacity, arguing that insufficient walking and cycling infrastructure to connect homes with bus stops, rail stations, schools and local services would limit the potential for mode shift. In this regard, submissions contend that cumulative development without parallel investment in active travel would reinforce car dependency rather than support sustainable mobility objectives. Overall, submissions present public transport and active travel as interdependent components of a wider mobility challenge in Adamstown and Lucan. The prevailing view expressed is that existing	• A masterplan-led approach to access, movement and connectivity. <u>Public Transport</u> The Council acknowledges concerns regarding public transport capacity and reliability, but notes that Adamstown is a strategic public transport location, anchored by Adamstown Railway Station and supported by an expanding bus network under BusConnects. Furthermore, the Council notes the response from Irish rail and the consideration of the SLO to manage growth. The SLO plays a key role in aligning development with public transport and managing growth, including: • A requirement linking development to the commencement of DART+ South West (or an equivalent rail service), ensuring alignment with strategic rail investment; • Recognition of the need for BusConnects service uplift and improved bus accessibility; and • Integration with existing and planned bus corridors serving Adamstown and the wider area. Further to this, and whilst the NTA has advised that development need not be strictly tied to DART+ South West, the Council considers that a phased approach linked to demonstrable improvements in public transport is appropriate, particularly given cumulative growth pressures. The SLO will be refined to retain this principle while allowing flexibility where equivalent infrastructure delivery can be demonstrated. It is noted that public transport service frequency, routing and capacity are operational matters determined by the National Transport Authority

deficiencies in capacity, reliability and connectivity—combined with concerns about development phasing—mean that further residential zoning at Adamstown SDZ West would exacerbate transport pressures unless strategic public transport upgrades and active travel infrastructure are delivered in a timely, coordinated and operational manner. In addition to the above the NTA also responded to the consultation. The summary of their submission indicates that once the various roads are available for use by buses, this site is intended to be served by the C2 bus with 8 services in the peak hour. It is also very close to Adamstown Station which offers 4 rail services to the City Centre in the AM Peak Hour. Furthermore, this site is contiguous to the built-up area of Dublin and future residents would be able to avail of the services (retail, schools etc.) within the SDZ. Parts of this site already benefit from a medium-high level of service under PTAL. The development of this site would align with the principle of developing lands contiguous to the built-up area in locations served by existing and proposed public transport services. **Community and Social Facilities and Schools** A significant proportion of submissions relating to Adamstown SDZ West raise concerns that community and social infrastructure has not kept pace with population growth across Adamstown and	and service providers. The primary role of the Planning Authority is to support and align with the delivery of strategic transport infrastructure, which provide the physical infrastructure upon which service levels are subsequently based. The Planning Authority rely on the statutory remit of the NTA to provide appropriate service levels in response to population growth. In this context, the delivery of infrastructure represents the key measurable milestone to link to growth. While the commencement of DART+ South West does not in itself deliver additional operational capacity, it represents the initiation of a committed infrastructure programme, which provides the basis for subsequent service enhancements and capacity increases. <u>Active Travel</u> Active travel is a fundamental component of the Adamstown SDZ and wider County transport strategy. Active travel reduces congestion by directly removing short car trips from the network, particularly at peak times when capacity constraints are most acute. Even modest reductions in peak traffic volumes can significantly improve network performance and junction efficiency. Walking and cycling also enable more efficient use of limited road space, increase the people-carrying capacity of corridors, and support public transport by reducing demand for car-based access trips. In addition, active travel facilitates more localised trip patterns, reducing the need for longer journeys on the strategic road network. The area already benefits from a comprehensive and well-established network of walking and cycling infrastructure, delivered in accordance with the SDZ Planning Scheme and forming part of the Cycle South

the wider Lucan area. These concerns are framed as cumulative rather than site-specific, with many submissions referencing the sustained build-out of Adamstown and Clonburris SDZs and the perception that supporting facilities have lagged behind residential occupation over time. Community and social facilities are consistently characterised as being under pressure, stretched beyond intended capacity, or inadequately provided for relative to the scale of development delivered to date. Deficits are identified across a broad range of facilities, including community centres, libraries and cultural spaces, leisure and gym facilities, sports and recreational amenities, youth facilities, childcare provision and healthcare services such as GP practices and primary care facilities. Submissions frequently state that existing facilities are oversubscribed, difficult to access, or unable to accommodate further population growth without significant expansion. In many cases, respondents describe reliance on facilities outside the immediate area, longer travel times to access services, and reduced opportunities for community participation as direct consequences of these shortfalls. A recurring theme is reference to facilities promised or envisaged under earlier phases of the Adamstown SDZ which, according to submissions, have either been delayed or remain undelivered. These include libraries, leisure or gym facilities, enterprise or cultural spaces and certain community amenities	Dublin programme. This network connects residential areas with schools, parks, local centres and Adamstown Station. The SLO requires that development at Adamstown SDZ West: • Integrates with and extends the existing active travel network; • Provides safe and attractive pedestrian and cycle connections to key destinations; and • Is designed in accordance with DMURS principles, prioritising street quality, reduced vehicle speeds and pedestrian/cyclist safety. This approach ensures that future development supports a modal shift towards active travel, reducing reliance on private car use and reinforcing the existing SDZ framework. <u>Parking</u> The Council notes concerns regarding parking pressures and overspill. The approach to car parking in the County is directly informed by national planning policy and reflects a clear shift towards supporting sustainable transport and reducing reliance on the private car. The South Dublin County Development Plan 2022–2028 adopts maximum (not minimum) car parking standards, which are applied on a location-based, accessibility-led approach. These standards vary across the County depending on access to public transport and services. National policy, particularly the Sustainable Residential Development and Compact Settlements Guidelines (2024), reinforces this approach and introduces Specific Planning Policy Requirements (SPPRs) which planning authorities are required to apply. Future development proposals must demonstrate compliance with these standards, having regard to site accessibility, density and

identified within SDZ planning frameworks. Submissions cite these delays as evidence of a disconnect between the pace of housing delivery and the timing of community infrastructure provision, and as a source of reduced confidence in assurances regarding future delivery. The continued absence of some long-anticipated facilities is frequently pointed to as an indicator that further rezoning risks compounding existing deficits. *Schools* Capacity pressures within both primary and secondary schools are widely and consistently referenced in submissions relating to Adamstown SDZ West, and are framed as a direct consequence of cumulative population growth arising from the ongoing build-out of Adamstown, Clonburris and the wider Lucan area. Submissions frequently state that existing schools in Adamstown and Lucan are operating at or close to maximum capacity, with enrolment growth having outpaced the delivery of permanent school infrastructure. As a result, several submissions note a continued reliance on temporary or modular classroom accommodation to meet demand, which is perceived as an interim solution that has become semi-permanent due to the scale and pace of residential development. A recurring issue highlighted is the loss or reduction of recreational and play space within school grounds, arising from the placement of temporary classrooms	availability of alternative transport modes. The SLO supports enhanced connectivity to public transport and active travel infrastructure, which will reduce reliance on private car use over time, while ensuring that adequate and appropriate parking provision is delivered. Summary Overall, the Planning Authority considers that transport issues raised in submissions are appropriately addressed through a comprehensive and integrated framework, including the established Adamstown SDZ transport network, ongoing strategic investment (DART+ South West, BusConnects, Cycle South Dublin), and the requirements of the Specific Local Objective. The SLO ensures that development at Adamstown SDZ West is infrastructure-led and plan-coordinated, with clear requirements for masterplanning, transport assessment and integration with existing networks. This approach supports compact growth and transit-oriented development, avoiding car-dependent sprawl and ensuring that future development is aligned with both existing infrastructure and planned transport investment. **Community and Social Facilities and Schools** The Council notes the concerns raised in submissions regarding capacity pressures across educational, community and social infrastructure within the Adamstown and wider Lucan area, including issues relating to school oversubscription, reliance on temporary accommodation, and perceived delays in the delivery of community and amenity facilities. The Planning Authority acknowledges that population growth associated with the general development of the wider area earlier in the report.

to accommodate expanding enrolments. Submissions argue that this situation negatively affects pupil wellbeing and educational quality, particularly in the context of younger age groups, where access to outdoor space is viewed as essential. The cumulative effect of incremental enrolment increases across multiple development phases is identified as a significant challenge, with schools adapting reactively rather than expanding in a planned and coordinated manner. Many submissions also reference wider catchment pressures, noting that families are increasingly required to secure school places outside their immediate area, including in neighbouring towns, due to limited local availability. This is cited as evidence that the existing education network is already overstretched and that further residential development within Adamstown SDZ West would intensify competition for places, increase travel demand, and further strain school transport and local roads. Concerns are not limited to primary education. A number of submissions extend similar arguments to post-primary schools, stating that secondary provision in the Lucan–Adamstown area is similarly operating at or near capacity and that projected population growth from additional rezonings has not been clearly matched with confirmed delivery timelines for new permanent secondary school	The Council has recently improved community and social infrastructure in the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House and the continued development of Griffeen Park. In this regard, the zoning of lands at Adamstown West will contribute to the ongoing review and refinement of social infrastructure planning by the Council, including engagement with key stakeholders such as the Department of Education, the Health Service Executive and the National Transport Authority to identify and address emerging demands. Substantial infrastructure has already been delivered within Adamstown, including: • A Local Centre with retail and café uses; • A District Centre providing a focal point for services and community activity; • Childcare provision distributed throughout the scheme; • A Primary Care Centre; • A Community Centre and associated facilities; • Two large multi-purpose parks; and • Three schools at Station Road (one primary and one post-primary). In addition to educational infrastructure, the Planning Scheme provides for the ongoing delivery of key community and social facilities, including: • A library and community facility; • An enterprise centre; • Additional childcare facilities; • A future Local Centre; and

infrastructure. In this context, submissions question whether adequate planning has taken place to address future second-level demand arising from the cumulative development trajectory of the area. A strong and consistent position articulated across submissions is that further zoning or development at Adamstown SDZ West should not proceed unless new school provision is delivered and operational in advance, rather than committed or planned in principle. Submissions express scepticism regarding assurances of future delivery based on past experience, where school infrastructure is perceived to have followed housing delivery with significant delays. This concern is often framed within broader calls for an infrastructure-first approach, with education infrastructure highlighted as a critical component of sustainable community development. A submission was received from the DOEY with regard to the Lucan, Adamstown and Palmerstown in response to the additional zoning in the Adamstown area. Such population expansion would likely generate demand for at least two additional primary schools, together with further post-primary provision, depending on demographic factors and the extent to which projected growth materialises. In this context, the Department emphasises the importance of ongoing coordination between South Dublin County Council and the Department of Education and Youth to plan for school capacity in the Lucan–	• Two further major parks and open spaces. It is also noted that the delivery of Adamstown SDZ is occurring over an extended period, including the economic downturn, during which housing delivery slowed significantly; as a result, the delivery of associated community and social infrastructure, which is intrinsically linked to the pace of housing development, was correspondingly delayed. The Planning Authority considers that the established infrastructure within the Adamstown SDZ will support future residents of this site, alongside additional site-specific infrastructure requirements under the SLO. While the lands will integrate physically with the Adamstown SDZ, they are not intended to act as a primary driver of infrastructure demand but will instead form a limited extension supported by, and complementary to, the existing and planned SDZ framework. Overall, the combined SDZ framework and SLO safeguards provide a robust, infrastructure-led mechanism to address concerns regarding overdevelopment and ensure that development is delivered in a coordinated and sustainable manner. In the context of the proposed zoning at Adamstown SDZ West, the accompanying Specific Local Objective (SLO) provides additional safeguards to ensure that development is directly linked to infrastructure provision. The SLO requires:

Adamstown–Palmerstown area and welcomes continued engagement on this matter. Overall, submissions present school capacity as a key indicator of whether the area has reached or exceeded a sustainable level of development intensity. The issue is framed not as opposition to new schools or growth in principle, but as concern that additional residential development without timely and sufficient educational provision would compound existing pressures, reduce quality of educational and community outcomes, and repeat patterns of infrastructure lag experienced during earlier phases of the Adamstown SDZ. **Water/Wastewater/Surface Water and SFRA** A notable number of submissions raise concerns regarding the capacity and sequencing of water supply, wastewater and drainage infrastructure serving Adamstown SDZ West and the wider Lucan–Adamstown area. These submissions largely frame water-related issues as part of a broader pattern of cumulative infrastructure pressure arising from sustained residential build-out within Adamstown and Clonburris SDZs, rather than as isolated servicing constraints specific to the amendment site alone. Wastewater infrastructure is repeatedly referenced as a critical constraint, with particular emphasis on the Tobermaclugg Pumping Station, which is	• A Social Infrastructure Audit, assessing existing capacity and identifying future needs arising from cumulative development; and • A comprehensive masterplan, integrated with the Adamstown SDZ Planning Scheme, ensuring that educational, community and social infrastructure is planned in tandem with development. This approach ensures that development cannot proceed in isolation and that infrastructure requirements are identified and addressed at the earliest stage of the development process. *Schools* Notably, the schools delivered at Station Road significantly exceed the requirements of the Planning Scheme, having been constructed with 32 classrooms each, compared to the minimum requirement of 16 classrooms. This has provided enhanced capacity to accommodate early and medium-term population growth. The Planning Scheme further makes provision for two additional school sites, both of which are progressing: • School Site 3 at Tandy's Lane, intended for a primary school with Special Educational Needs (SEN) provision; and • School Site 4 at Aderrig, a flexible site capable of accommodating either a primary or post-primary school depending on future demand. Both sites have planning permission, are being advanced by the Department of Education and Youth and include provision for interim accommodation (e.g. modular classrooms) to ensure capacity can be delivered in line with or ahead of residential occupation. In total, this equates to four schools within Adamstown (two delivered and two

identified within the Adamstown SDZ Planning Scheme as a key element of the local wastewater network and as being intrinsically linked to the phasing of development and the delivery of Tobermaclugg Park. Submissions express concern that existing or residual capacity at the pumping station is already under pressure due to ongoing SDZ development and that further residential zoning at Adamstown SDZ West could exacerbate these constraints. Several submissions cite the cumulative impact of multiple rezonings and development phases feeding into the same wastewater catchment and argue that this has not been adequately addressed through visible or completed infrastructure upgrades to date. A recurring theme in submissions is scepticism regarding the timing of wastewater infrastructure delivery. Drawing on what submitters describe as historic experience within Adamstown, it is argued that residential development has, in practice, advanced ahead of the completion or commissioning of essential servicing upgrades, notwithstanding the presence of statutory SDZ Planning Schemes. This experience is cited as undermining confidence that future development at Adamstown SDZ West would be adequately serviced at the point of occupation. On this basis, submissions frequently contend that further rezoning or development should be deferred until wastewater upgrades are completed, operational and demonstrably sufficient to meet	permitted/progressing), all designed to exceed or respond flexibly to demand, demonstrating proactive planning rather than reactive provision. While generalised pressures in school enrolment and community facility demand across the wider Lucan area are acknowledged, the Planning Authority is satisfied that the combined application of the Adamstown SDZ Planning Scheme, the County Development Plan, and the Adamstown West SLO provides a comprehensive and enforceable framework to address these issues. This framework ensures the coordinated, proportionate, and timely delivery of community, social and educational infrastructure, thereby safeguarding community cohesion and quality of life. In response to the DOEY and the need for additional school capacity area flagged in the response, it is appropriate to include an updated SLO to reflect same. Further clarification was sought on a number of sites and the requirements of the variation sites. Therefore, further provision and capacity can be set out during the masterplanning of the lands and, separately, as part of the future delivery of the SDA via amendments to the relevant SLOs. **CE Recommendation** Amend wording of the SLO no. CS7 SLO4 to reflect requirement to ensure adequate future capacity within the wider vicinity in respect of school delivery, and continuing to liaise with the DOEY: ***g. ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth***

both existing demand and future growth arising from Adamstown SDZ West and surrounding zoned lands. Concerns regarding water supply capacity are raised to a lesser extent but generally echo the same cumulative narrative. Submissions question whether the strategic water supply network serving Adamstown and Lucan has sufficient resilience to accommodate additional population growth, particularly when considered alongside climate pressures, increased demand and the scale of residential development already delivered or permitted in the area. These concerns are often presented alongside wastewater capacity issues as part of a broader servicing challenge rather than as a stand-alone constraint. Surface water management emerges as a related but distinct issue within submissions. Respondents highlight concerns that further development would increase impermeable surfaces, generate additional runoff and place pressure on local drainage systems. Submissions express apprehension that inadequate surface water management could contribute to local flooding or ponding issues during periods of heavy rainfall and could also impact the usability and quality of open space, particularly where open areas are relied upon for attenuation without appropriate design or long-term maintenance. These concerns are often framed in the context of climate change and more frequent intense rainfall events, with	Accordingly, the Planning Authority is satisfied that the proposed zoning and associated proposed amended Specific Local Objective (SLO) incorporate appropriate safeguards to ensure that development at Adamstown SDZ West is supported by the necessary infrastructure, consistent with national and local policy. The SLO provides a robust, masterplan-led mechanism requiring the preparation of a Social Infrastructure Audit to assess existing provision, identify deficits and determine future community and educational needs, thereby ensuring that infrastructure is clearly identified and delivered in tandem with residential development. It is important to note that from a strategic perspective, the Council maintains ongoing engagement with the Department of Education and Youth, ensuring that school provision is aligned with projected population growth, zoning proposals and SDZ build-out. This ensures that educational infrastructure is planned at a strategic, area-wide level, rather than in response to individual developments. In summary, while the concerns raised in submissions regarding current pressures on schools and community facilities are acknowledged, the Planning Authority is satisfied that the Adamstown SDZ Planning Scheme, the delivery of significant infrastructure to date (including five schools, two of which are already operational with additional capacity), the provision of additional committed facilities, and the safeguards contained within the amended SLO, together provide a robust, enforceable and plan-led framework. This framework ensures that future development is supported by the timely, phased and coordinated provision of community, social and educational infrastructure, safeguarding the quality of life of both existing and future residents. **Water/Wastewater/Surface Water and SFRA**

submissions seeking reassurance that drainage and sustainable drainage measures would be capable of managing increased runoff arising from cumulative development. In contrast, submissions relating specifically to fluvial flood risk or mapped Flood Zones A or B do not materially arise in respect of Adamstown SDZ West. While surface water and drainage capacity are raised repeatedly, there are no substantive objections challenging the appropriateness of zoning on the basis of river flooding or Strategic Flood Risk Assessment (SFRA) mapping. References to flood risk are largely confined to localised surface water issues rather than to strategic flood risk policy considerations. Similarly, SFRA matters are not addressed in a detailed or technical manner within submissions relating to Adamstown SDZ West. Submissions do not generally raise compliance with national flood risk management guidelines or challenge the zoning of the lands on SFRA grounds. Instead, the dominant water-related concern centres on whether drainage infrastructure, wastewater capacity and surface water management will be delivered in a timely, coordinated and effective manner, informed by past experience in Adamstown. Overall, submissions present water, wastewater and surface water issues as a cumulative infrastructure	The Council has carefully considered the issues raised in submissions relating to water supply, wastewater capacity, surface water management and flood risk in respect of Adamstown SDZ West, including Proposed Variation Site 158, and has had regard to the Strategic Flood Risk Assessment (SFRA) and the proposed Specific Local Objective (SLO) governing the development of the lands. Proposed Variation Site 158 comprises areas of open grassland located adjacent to Aderrig Glade in the township of Aderrig, to the south-west of Lucan. The lands are currently zoned for rural amenity and agriculture and it is proposed to rezone them for residential development. A watercourse flows along the eastern boundary of the site, which is identified under the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study. Any remnant field drains within the site constitute surface water features and can be appropriately incorporated into a future Sustainable Drainage Systems (SuDS) network as part of any development proposals. In flood risk terms, the SFRA identifies that the site is not located within Flood Zones A or B, nor does it fall within the 1% Annual Exceedance Probability (AEP) or 0.1% (High End Future Scenario) flood extents. Accordingly, the Planning Authority notes that no Justification Test is required, and the proposed variation to residential zoning is appropriate in principle from a strategic flood risk policy perspective. Flood risk for any future development proposals will be required to be assessed in accordance with Section 4.3 of the SFRA, including the preparation of a site-specific Flood Risk Assessment where necessary. The Council acknowledges submissions expressing concern that wastewater and drainage infrastructure, including the Tobermaclugg Pumping Station, is under pressure due to cumulative development

risk, closely linked to phasing, sequencing and trust in delivery mechanisms. The prevailing position articulated is that additional residential zoning at Adamstown SDZ West would be inappropriate unless servicing infrastructure upgrades are not only planned or committed, but fully implemented, operational and capable of accommodating both current pressures and projected future demand without compromising environmental quality, amenity or the functioning of existing SDZ lands. In addition to the above the Office of Public Works (OPW) also submitted a response to the consultation, in summary is is as follows: The OPW submits that amendment amends lands from less vulnerable RU (Rural) to highly vulnerable RES-N (New Residential). As noted in the SFRA, no mapped extents encroach on the site area. There is however an un-modelled watercourse shown in the EPA indicative flow network dataset passing through the zoned lands. The SFRA notes in relation to these lands that "Any remnant field drains are surface water features and can be picked up by the SuOS network under any future development". The submission seeks further clarity/confirmation to support the assertion that the watercourse at this location is a surface water drainage feature, rather than a watercourse as indicated in EPA data. **Green Infrastructure and Open Space**	within Adamstown and Clonburris SDZs. The Planning Authority notes that such concerns relate primarily to servicing capacity and delivery sequencing, rather than to strategic flood risk or zoning suitability. In this regard, the proposed rezoning is not unconstrained and is expressly subject to the requirements of the Specific Local Objective applying to residentially zoned lands to the west of Adamstown SDZ. The SLO requires that an infrastructure masterplan be submitted as part of any planning application for residential development, addressing water and wastewater network upgrades necessary to serve the subject lands and demonstrating that the servicing of surrounding zoned lands, including Clonburris SDZ, will not be compromised. This infrastructure masterplan must be agreed in advance with Uisce Éireann, providing a clear and enforceable mechanism to ensure that wastewater and water supply constraints are resolved prior to development proceeding. In addition, the SLO mandates a comprehensive masterplan for the lands, integrated with the Adamstown SDZ Planning Scheme and informed by the cumulative development potential of the wider area. This masterplan must be supported by a Public Open Space Audit and a Transport and Traffic Assessment, and will also facilitate the appropriate design and integration of surface water management measures, including SuDS, to address runoff, attenuation and water quality. The use of SuDS is particularly relevant to Proposed Variation Site 158, where surface water features such as field drains can be retained, enhanced and incorporated into the drainage strategy in a manner that supports both flood mitigation and amenity. Concerns raised in submissions regarding surface water runoff and the potential impact on open space usability are noted. The Planning

Biodiversity, green infrastructure, parks and public open space feature prominently and consistently across submissions relating to Adamstown SDZ West, with many respondents expressing concern about the cumulative loss and pressure on remaining green assets in the area. Submissions frequently reference the importance of existing hedgerows, open grassland, undeveloped lands, wildlife habitats and ecological corridors within and adjacent to the Adamstown SDZ, emphasising that these elements play a critical role in supporting biodiversity, landscape character, ecological connectivity and climate resilience. A number of submissions argue that further rezoning for residential development would result in the erosion or fragmentation of these green networks, leading to irreversible environmental harm, loss of habitat and diminished ecological function over time. Several submissions highlight the role of remaining green infrastructure as a buffer between established residential areas and larger development blocks, noting its contribution to visual amenity, microclimate regulation, surface water absorption, and mitigation of urban heat and flood risk. Concern is expressed that continued incremental development across Adamstown and Lucan has steadily reduced the extent of undeveloped land available to perform these functions, and that Adamstown SDZ West represents one of the last remaining opportunities to retain substantial green	Authority reiterates that all future development proposals will be required to demonstrate that surface water is managed in a sustainable and climate-resilient manner, consistent with national guidance, the County Development Plan and the SFRA, and that open spaces provided within developments function effectively for both amenity and drainage purposes. The SFRA produced for variation states the following: *Proposed variation site 158 [Adamstown SDZ West] comprises open grassland. It is situated adjacent to Aderrig Glade in the township of Aderrig to the southwest of Lucan. The lands are currently zoned for rural amenity and agriculture. It is proposed change the zoning to residential. A watercourse flows along the eastern boundary which is mapped under the Eastern CFRAM. Any remnant field drains are surface water features and can be picked up by the SuDS network under any future development. The site is not situated within Flood Zones A or B, nor in the 1% AEP and 0.1% HEFS extents. Thus, no justification test is required and the variation to the land use zoning in the CDP is appropriate. Flood risk for any new development should be assessed in accordance with Section 4.3 of this SFRA.* With regard the OPW submission and in response to the OPW submission, SDCC notes the OPW's confirmation of the FRA staging requirements. The SFRA's requirements for sites in Flood Zone A or B are consistent with the Guidelines. SFRA consultants JBA confirms Eastern CFRAM outputs should be drawn upon to inform, not substitute for, a site-specific Stage 3 FRA. The updated SFRA states: *The SFRA confirms Site 158 [Adamstown SDZ West] is not within Flood Zone A or B, nor HEFS extents. The SFRA notes a watercourse mapped under the Eastern CFRAM flows along the eastern boundary, and that*

infrastructure within the area. In this context, submissions frequently frame biodiversity and green infrastructure as integral to quality of life and long-term environmental sustainability, rather than as secondary considerations. Closely linked to biodiversity concerns is a significant body of submissions highlighting deficiencies in the provision of parks and public open space. Respondents state that existing parks and recreational spaces within Adamstown and the wider Lucan area are already under pressure, particularly given sustained population growth associated with the SDZ build-out. While acknowledging the identification of a strategic open space network within the Adamstown SDZ Planning Scheme, submissions consistently point to the non-delivery or partial delivery of several key parks, including Tobermaclugg Park, Central Boulevard Park and Tandy's Lane, with Airlie Park often cited as insufficient on its own to meet current and future demand. The delay in delivering these strategic and neighbourhood parks is frequently referenced as evidence of a gap between planned and realised open space provision. Submissions express concern that additional residential development within Adamstown SDZ West would further intensify pressure on limited recreational and amenity spaces, leading to overcrowding, reduced usability, and diminished	*remnant field drains are surface water features manageable within the SuDS network.* Following additional clarification from JBA consultants, the following was clarified with respect of the site: *Having reviewed the OSI historic maps (6" & 25") of Site 158, there is no indication of a stream in this area. The geometry of the watercourse does not also match a natural river systems and has 90degree bends.* *Further review of the LIDAR confirms that there is no catchment to the west of the site that would provide river flows to this system. In its current form it acts as a surface water drain that serves Site 158 only.* In summary, while the Council acknowledges concerns regarding servicing capacity and past experiences of infrastructure lag, it is satisfied that Proposed Variation Site is not constrained by fluvial flood risk, that the proposed zoning is appropriate from an SFRA perspective, and that the combination of the Strategic Flood Risk Assessment and the Specific Local Objective provides a robust, plan-led framework. This framework ensures that water, wastewater and surface water considerations are comprehensively assessed and addressed at planning application stage, in consultation with Uisce Éireann, and that development cannot proceed unless adequate and sustainable infrastructure provision is demonstrably in place. **Green Infrastructure and Open Space** The Council acknowledges the concerns raised in submissions regarding biodiversity, green infrastructure, parks and public open space within Adamstown and the wider Lucan area. The Planning Authority recognises the importance of existing green infrastructure elements—such as hedgerows, undeveloped lands, ecological corridors

recreational value. This is particularly highlighted in relation to informal recreation, children's play, walking and passive use, with several submissions noting a lack of accessible, multifunctional green spaces relative to population size. The cumulative nature of this pressure is emphasised, with respondents arguing that even if new open space is proposed within future development sites, it may not fully compensate for the loss of existing greenfield lands or for delays in delivering larger strategic parks. Overall, submissions present biodiversity, green infrastructure and open space as interconnected and foundational elements of sustainable development in Adamstown and Lucan. The prevailing concern is that without the timely delivery of planned parks and the careful retention and enhancement of existing green infrastructure, further rezoning of Adamstown SDZ West would exacerbate environmental degradation, reduce ecological connectivity, and undermine the capacity of the area to support both current and future communities. **Environment and Climate Action** Environmental and climate action concerns are raised across a broad range of submissions relating to Adamstown SDZ West, often interconnected and framed in cumulative rather than site specific terms. Submissions commonly express the view that continued residential expansion in Adamstown and	and open spaces—in supporting biodiversity, amenity, climate resilience and overall quality of life. These matters are integral to the planning and delivery of Adamstown as a strategic growth area and are explicitly addressed through both the Adamstown SDZ Planning Scheme and the proposed Specific Local Objective (SLO) governing Adamstown SDZ West. From a factual perspective, the Council notes that the Adamstown SDZ Planning Scheme provides a comprehensive and hierarchical open space and green infrastructure network. Within the SDZ, four strategic parks are provided for: • Airlie Park – delivered and in public use; • Tandy's Lane Park – delivered and operational; • Central Boulevard Park – currently under construction; and • Tobermaclugg Park – identified for delivery in Phase 9 of the SDZ Planning Scheme. In addition to these strategic parks, Adamstown includes a range of neighbourhood and local open spaces, public squares, landscaped streets and civic spaces associated with local and district centres, as well as green corridors and pedestrian-focused routes. Together, these elements form a planned and interconnected green infrastructure network rather than isolated pockets of open space. The Planning Authority acknowledges that some strategic parks are at different stages of delivery; however, their provision is secured within a statutory planning framework and tied to the phased development of the SDZ. In relation to concerns about biodiversity and green infrastructure loss, the Council emphasises that Adamstown is planned as a landscape-led urban environment, where green infrastructure is not residual but forms part of the structural framework of development. Biodiversity, surface

the wider Lucan area is contributing to a gradual erosion of environmental quality, with respondents highlighting air quality impacts, noise, loss of landscape character, pressure on biodiversity and the steady reduction of undeveloped or semi-natural land. In environmental terms, many submissions point to traffic related air pollution and noise impacts as a growing concern, noting that congestion is no longer confined to peak periods and is experienced throughout much of the day. Increased vehicle idling, rat running through residential areas and pressure on already constrained road networks are cited as factors contributing to deteriorating air quality and heightened noise levels, particularly near main roads, junctions and residential estates. These impacts are frequently described as incremental, with each successive phase of development adding to an already stressed environment. Submissions also raise concerns about the loss of landscape character and cumulative ecological degradation, particularly where development encroaches onto remaining greenfield or semi-natural lands. Respondents argue that undeveloped lands around Adamstown SDZ West act as visual, ecological and environmental buffers and that their loss would further urbanise the area, diminishing local distinctiveness and environmental resilience. These concerns are often linked to broader themes	water management, recreation and movement are integrated through parks, green corridors and tree-lined streets, helping to maintain ecological connectivity and climate resilience within an urban setting rather than relying solely on undeveloped greenfield lands. With specific regard to Adamstown SDZ West, the proposed rezoning is accompanied by a robust Specific Local Objective expressly intended to respond to the concerns raised in submissions. The SLO requires the preparation of a comprehensive masterplan, integrated with the Adamstown SDZ Planning Scheme and informed by the cumulative development potential of the area. As part of this process, the SLO mandates: • A Public Open Space Audit, to inform the quantity, quality and functionality of open space and recreational facilities associated with any future development; • The retention and enhancement of the east–west hedgerow in the northern part of the site (as recorded on 1st Edition Ordnance Survey maps), unless removal is demonstrably required for wider movement or integration needs; and • A coordinated approach to green infrastructure, transport and access, ensuring that open spaces and biodiversity features are integrated within the wider SDZ network rather than compromised in isolation. The SLO therefore ensures that development at Adamstown SDZ West cannot proceed without demonstrable provision for public open space and green infrastructure, and that such provision must function as part of the wider Adamstown green network. This approach directly addresses concerns that additional development would intensify pressure on existing parks, as it requires new development to contribute to, and not merely rely upon, existing amenities.

of biodiversity loss and the fragmentation of green infrastructure, with submissions expressing apprehension that incremental development—rather than clearly defined landscape led planning—risks undermining long-term environmental sustainability. Climate action considerations are raised both explicitly and implicitly throughout submissions. A recurring argument is that permitting additional development in advance of high capacity public transport being fully operational conflicts with national and local climate action objectives. Submissions assert that current public transport constraints force high levels of car dependency for everyday commuting, school travel and access to services, and that further residential development would intensify this pattern. This is viewed as incompatible with emissions reduction targets and efforts to transition to more sustainable mobility choices. Many respondents therefore link climate action concerns directly to phasing and transport delivery, arguing that development based on the commencement rather than completion of strategic infrastructure such as DART+ South West would lock in car dependent travel for a prolonged interim period. Increased private car use is associated in submissions with higher greenhouse gas emissions, poorer air quality and reduced effectiveness of climate mitigation measures, particularly in an area	The Planning Authority further considers it important to note that the SDZ framework allows for the progressive delivery of strategic parks and green infrastructure in tandem with population growth, rather than requiring all elements to be delivered at an early stage. This phased approach is consistent with national best practice for large-scale planned communities and ensures that green infrastructure is delivered at an appropriate scale and in accessible locations as the area evolves. In summary, while the Council acknowledges concerns regarding biodiversity, open space delivery and cumulative pressure on amenities, it is satisfied that the Adamstown SDZ Planning Scheme, which has already delivered two major parks and is progressing a third, together with the clear safeguards and requirements set out in the Specific Local Objective for Adamstown SDZ West, provides a strong, enforceable and landscape-led framework. This framework ensures that biodiversity, green infrastructure and public open space are central to any future development, delivered in a phased and coordinated manner, and fully integrated with the existing and planned amenity network of Adamstown. **Environment and Climate Action** The Council acknowledges the environmental and climate action concerns raised in submissions relating to Adamstown SDZ West, including issues of air quality, noise, loss of landscape character, pressure on biodiversity and the cumulative effects of urban expansion across Adamstown, Lucan and Clonburris. The Planning Authority recognises that these concerns are framed primarily at a strategic and cumulative level, rather than as site-specific objections to the zoning of the lands in isolation, and that they reflect wider apprehension about the long-term sustainability of continued growth in this part of the county.

already experiencing congestion and mobility constraints. A submission was also received from the DHLGH NPWS unit with regard heritage-related (mostly environmental) observations/recommendations. In summary these were that The proposed variation involves the rezoning of approximately 156 hectares of land for residential development, including areas currently designated as Rural, Open Space, and High Amenity. This raises an overarching concern regarding the likely reduction in biodiversity across multiple sites, with potential impacts on species such as badgers, bats, otters, amphibians, birds, and protected plant species. Key risks identified include habitat loss, disturbance from inappropriate lighting (particularly affecting bats), and encroachment into sensitive ecological corridors. To address these issues, it is recommended that biodiversity protection be fully integrated into all development proposals, that lighting in sensitive areas be designed to be bat-friendly, motion-activated, and avoid spill into natural habitats, and that strong ecological buffers—especially near protected areas—be maintained or enhanced. Furthermore, all development should be guided by comprehensive ecological assessments to ensure informed and sustainable outcomes. Inland Fisheries Ireland highlights concerns regarding the potential impact of the proposed Variation on	From the Council's perspective, Adamstown is planned and delivered as a strategic, compact settlement, consistent with national and regional policy objectives which direct growth to locations with existing and planned infrastructure, services and public transport. Concentrating development in such locations is intended to reduce dispersed greenfield development elsewhere, support more efficient land use, and enable the delivery of higher-order public transport, community facilities and green infrastructure at scale. The Council notes that many of the environmental pressures identified in submissions—such as traffic-related emissions and noise—are transitional impacts associated with areas undergoing significant growth and infrastructure change, rather than indicative of the long-term intended functioning of the settlement. In relation to air quality and noise, the Council recognises the link made in submissions between congestion, car dependency and environmental quality. These issues are closely connected to transport capacity and travel behaviour. As outlined elsewhere, the proposed zoning of Adamstown SDZ West is expressly linked through the Specific Local Objective (SLO) to the advancement of strategic transport infrastructure, including DART+ South West, and is further subject to detailed Transport and Traffic Assessment at application stage. The Council considers that managing traffic growth, supporting modal shift and reducing reliance on private cars over time are critical to addressing air quality and noise impacts, and these objectives are embedded within the County Development Plan, the Adamstown SDZ Planning Scheme and the SLO framework. Concerns raised regarding loss of landscape character and ecological degradation are acknowledged, particularly the comments from the

water quality, flood risk and aquatic ecosystems, noting that the SEA does not fully address the requirements of the EU Nature Restoration Regulation. The submission emphasises the need to protect surface and groundwater under the Water Framework Directive and warns that insufficient maintenance of SuDS infrastructure could increase flood risk and degrade water quality. IFI also raises concerns about wastewater network capacity, including existing pressure on the foul conveyance system and increased instances of CSO discharges, and advises that significant investment in water and wastewater infrastructure will be required to support future development without adversely affecting the aquatic environment. Overall, submissions present environment and climate action as interlinked strategic issues, contending that cumulative development across Adamstown, Lucan and Clonburris risks undermining environmental quality and climate goals unless growth is more tightly coordinated with transport capacity, green infrastructure protection and active travel provision. The prevailing concern expressed is not opposition to development in principle, but that continued greenfield development and transport limited growth would exacerbate environmental pressures, increase emissions and diminish amenity unless environmental and climate considerations are placed at the forefront of future plan-making and phasing decisions.	NPWS. The Council notes that Adamstown is not planned as a conventional greenfield suburb but as a landscape-led urban area, with a structured network of parks, open spaces, green corridors and street trees integrated into the urban form. Two of the four strategic parks provided for in the Adamstown SDZ Planning Scheme have already been delivered, a third is under construction, and the fourth is identified for delivery in the later phases of the Scheme. These are complemented by neighbourhood open spaces and green links that perform ecological, recreational and climate-resilience functions. This planned approach differs fundamentally from ad-hoc development and is intended to ensure that environmental quality is embedded within the settlement structure over time. A similar approach in terms of in tandem delivery of parks will be facilitated through the SLO, which contains environmental sensitives. With specific regard to Adamstown SDZ West, the Council highlights that the SLO introduces additional environmental safeguards in response to cumulative concerns. Of particular note is the requirement under SLO Part 3(a) for the retention and enhancement of the east–west hedgerow in the northern part of the site, as recorded on 1st Edition Ordnance Survey maps, unless removal is required for wider movement needs. This measure was informed by Strategic Environmental Assessment and is intended to protect ecological connectivity, landscape structure and biodiversity at plan level. In addition, the SLO requires a Public Open Space Audit, a Social Infrastructure Audit, and a masterplan-led approach integrated with the Adamstown SDZ framework, ensuring that environmental, social and movement considerations are addressed collectively rather than incrementally.

Aviation Safeguarding A submission was received from TPA consultants on behalf of Weston Airport. Support was indicated for the overall intent of Proposed Variation No. 2, and South Dublin's approach to aligning the Development Plan with the National Planning Framework (NPF) Housing Growth Requirements (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). The primary purpose of the submission is to safeguard the current and future operational, safety and technical requirements of Weston Airport, in accordance with Section 11.8.3 of the South Dublin County Development Plan 2022–2028. The submission notes that a number of land parcels proposed for rezoning and requests that any future planning applications on these lands be carefully assessed to ensure there are no adverse impacts on the operational integrity of Weston Airport, aviation safety requirements, and associated specialist aviation activities, including the Irish Coast Guard Search and Rescue helicopter operations based at the airport. It is highlighted that Weston Airport, in consultation with the Irish Aviation Authority (IAA), is currently implementing RNAV (Area Navigation) approach procedures for Runway 07/25. These procedures will be used by the Coast Guard Search and Rescue	Climate action considerations raised in submissions—particularly concerns about development advancing ahead of fully operational high-capacity public transport—are also noted. The Council reiterates that the Development Plan and SLO seek to align land use with committed strategic transport investment, while recognising that the plan-making process must necessarily operate over a longer time horizon. The requirement that development may not commence until DART+ South West has commenced construction, combined with strong active travel provision, parking standards influenced by proximity to public transport, DMURS-based street design, and ongoing engagement with the NTA and TII, is intended to support a progressive modal shift toward public transport and active travel rather than locking in car-dependent patterns in the long term. With regard to the comments from the DHLGH and Inland Fisheries, it is considered that these issues raised are and will be dealt with via the SLO and the preliminary assessments undertaken alongside and prior to the site being assessed for future development and masterplanning. The CDP alongside relevant internal staff will ensure that the required buffers, safeguarding and mitigation measures are made in line with the comments received and aligned with best practice approaches. Overall, while the Council acknowledges that environmental and climate pressures are currently experienced by residents and that cumulative impacts must be carefully managed, it considers that the proposed zoning of Adamstown SDZ West, when read in conjunction with the Adamstown SDZ Planning Scheme, the County Development Plan, strategic transport investment and the enhanced Specific Local Objective, provides a robust, plan-led framework. This framework seeks to avoid, reduce and mitigate environmental impacts over time, to support compact and sustainable growth, and to ensure that

service and are identified as particularly sensitive to inappropriate development that could interfere with flight paths, safety surfaces, or navigational requirements. Overall, while supporting the strategic aim of increased housing delivery, the submission emphasises the importance of ensuring that future development near Weston Airport is managed in a manner that avoids conflict with aviation operations, through careful planning assessment and adherence to existing airport-related policy provisions in the Development Plan. **Miscellaneous** *Heritage* Heritage-related concerns arise in submissions primarily in relation to the incremental impact of development on historic landscapes and their setting, rather than through objections to specific designated heritage assets within the amendment site. Submissions refer in particular to the importance of historic hedgerows, demesne landscapes, field patterns and the wider rural-urban edge character around Adamstown SDZ West, noting that such features contribute to the historical legibility and identity of the area. Several submissions argue that successive rezonings and development phases risk the gradual erosion of these heritage elements and their setting, particularly where development diminishes the	environmental and climate objectives remain central to ongoing plan-making and development phasing decisions. **Aviation Safeguarding** A submission made on behalf of Weston Airport has been carefully considered, with particular regard to the safeguarding of aviation operations, public safety, and the operational and technical requirements of civil aerodromes within and adjoining South Dublin County. The Council supports aviation safeguarding as set out within Chapter 11.8 of the South Dublin County Development Plan 2022–2028, which provides a comprehensive framework for development controls in the vicinity of Dublin Airport, Casement Aerodrome and Weston Airport, having regard to international, European and national aviation standards. These include the safeguarding requirements established under ICAO Annex 14, the Irish Aviation Authority (IAA) Guidance on Aerodrome Safeguarding, and the EASA Certification Specifications for Aerodromes. The Council recognises the role of Weston Airport as a key aviation facility, including its use for pilot training and Irish Coast Guard Search and Rescue operations, and notes ongoing developments such as RNAV approach procedures. The Council reaffirms its commitment to Policy IE10 and associated Development Plan objectives, which ensure that development in the vicinity of the airport is appropriately managed. In addition, the continued application of Public Safety Zones (PSZs) under Policy IE14 is emphasised, restricting development in areas close to runway thresholds in the interests of public safety. Overall, the Council is satisfied that the existing Development Plan framework provides adequate safeguards to protect airport operations and

transition between built-up areas and historic landscapes. While limited direct reference is made to individual Protected Structures, concerns are expressed regarding cumulative change affecting the context and appreciation of heritage assets in the wider Lucan and Adamstown area, rather than through direct physical impacts alone. *Employment* Employment-related matters do not emerge as a distinct or substantive theme within submissions relating to Adamstown SDZ West. No submissions advocate for the zoning of employment lands on the site, nor do they object to the proposed residential zoning on employment grounds. Where employment is referenced, it is generally incidental and arises in the context of commuting pressures, congestion and travel to work, rather than local job provision. Submissions focus instead on transport capacity and service strain associated with commuting patterns, rather than proposing changes to the employment function or land-use balance of the amendment site. *Retail* Retail provision is not substantively addressed in submissions for Adamstown SDZ West. References to shops or services occur only tangentially, typically as part of wider commentary on community and social infrastructure provision and access to everyday services. Submissions do not raise retail planning policy concerns, nor do they propose additional retail	residential amenity, and supports the continued safeguarding of Weston Airport's function. **Miscellaneous** The Council acknowledges the matters raised in submissions under the headings of heritage, employment, retail, utilities and broader quality-of-life issues. These concerns are noted and have been considered within the wider statutory and policy framework governing the proposed zoning of Adamstown SDZ West. *Heritage* In relation to heritage, the Planning Authority notes that concerns raised focus primarily on the cumulative impact of development on historic landscapes, hedgerows, demesne features and the wider character and setting of the area, rather than on direct impacts to individual designated heritage assets. The Council wishes to clarify that heritage protection is governed by provisions in County Development Plan objectives and the consultation of specialist internal officers, including conservation and heritage expertise, as part of both plan-making and development management processes. Importantly, in response to SEA findings, the Specific Local Objective (SLO) was updated to include Part 3(a), which requires the retention and enhancement of the east–west hedgerow in the northern part of the site, as recorded on 1st Edition Ordnance Survey maps, unless removal is required for wider movement needs. This hedgerow is recognised not only as a biodiversity asset but also as a historic landscape feature that contributes to the character and legibility of the area. This SEA-led amendment ensures that heritage considerations are embedded at plan level, with further detailed assessment required at masterplanning and planning application stage.

development or object to the amendment on retail grounds. There is no evidence of submissions identifying deficiencies in the retail network specifically associated with the proposed rezoning. *Utilities* Concerns relating to utilities are raised in a more general and cumulative context. In addition to water and wastewater infrastructure, some submissions refer to pressure on electricity supply, communications and digital infrastructure, expressing apprehension that existing systems are already operating under strain due to sustained population growth. These submissions assert that continued residential expansion without visible or completed upgrades could affect service reliability and resilience. As with other infrastructure topics, utilities are presented as part of a broader pattern of infrastructure lag rather than as site-specific constraints unique to Adamstown SDZ West. A submission was recieved from UE. Uisce Éireann advises that development within Adamstown SDZ West is feasible subject to significant infrastructure upgrades. While a strategic trunk watermain runs along the western and southern boundaries of the site, it must be protected through the retention of a wayleave, with development not permitted to compromise access or structural integrity. Direct connection to the trunk main is not permitted, and servicing must instead connect to the existing SDZ	*Employment* With regard to employment, the Council notes that employment-related issues do not arise as a substantive theme in submissions. No submissions seek alternative employment zoning for the lands, nor do they object to the proposed residential zoning on employment grounds. References to employment arise only indirectly in the context of commuting pressures and travel patterns, which are addressed through transport, phasing and sustainable mobility policies rather than land-use designation. *Utilities* In respect of utilities, the Council acknowledges submissions referring to pressure on electricity, communications and other servicing infrastructure. These concerns are considered alongside water and wastewater matters and are addressed through a combination of Development Plan policies, statutory service provider roles and development management requirements. The SLO reinforces this framework by requiring an infrastructure masterplan, agreed in advance with Uisce Éireann, and by ensuring that development is brought forward through a coordinated, masterplan-led approach informed by cumulative development potential. This allows servicing requirements, including utilities beyond water services, to be identified and addressed in a structured manner prior to development. Notwithstanding the above UE have responded to the consultation with the following submission in response to concerns about capacity in the area. UE state that Capacity in the wider area would require ‘significant upgrades’ however also state ‘We have no objections to the proposed material alterations to allow for additional housing growth (including

network, reinforcing the need for a coordinated and infrastructure-led approach to development. Furthermore, the ESB highlights the critical importance of electricity infrastructure in supporting housing and economic development, noting that modern homes require significantly greater electrical capacity than those built prior to 2019. This increased demand, combined with climate change pressures, necessitates the expansion and reinforcement of the electricity network to ensure reliability and resilience. ESB emphasises that substantial upgrades to transmission and distribution infrastructure will be required to support the delivery of national housing targets, including up to 300,000 new homes. *Quality of Life and Perception of Planning* A number of submissions raise broader issues relating to quality of life, public safety, antisocial behaviour and community wellbeing. These matters are generally framed as secondary consequences of population growth, congestion and perceived infrastructure shortfalls rather than as standalone objections to the proposed zoning. Several submissions reference a perceived erosion of trust arising from previously undelivered or delayed infrastructure commitments within earlier Adamstown SDZ phases, using this experience to support objections to further rezoning. These concerns tend to reinforce wider arguments for	changes to land zoning & residential density ranges). The 9B strategic sewer runs through most of South Dublin with effluent flows terminating at Ringsend Treatment Plant. The 9B sewer isa combined sewer and is constrained UÉ are currently looking at potential solutions which may include, sewer duplication and storage. In the interim, separation of storm water, removal of infiltration, misconnections and SUDs solutions must be looked at'. Specifically with regard the variation site, UE state that 'Ref No.2 Adamstown SDZ West - Feasible subject to upgrades Water Network: A strategic trunk watermain runs along the western and southern boundary of the site. A wayleave must be maintained, and development cannot inhibit access for maintenance or endanger its structural integrity. Connection to the Trunk Mains not allowed, need to connect to SDZ network.' As mentioned above, the SLO will provide safeguarding and ensure the delivery of infrastructure relating to water/wastewater. In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place. A submission was received from the Electricity Supply Board (ESB) with regard the overall variation, having no site specific objections to the proposed variation. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade

infrastructure-led phasing and caution rather than introducing separate policy issues in their own right. Overall, issues in these categories are subsidiary to the main themes of phasing, infrastructure capacity, transport and environmental impact, and are generally raised to support broader objections to cumulative development rather than to challenge the amendment site on discrete heritage, employment, retail or utility policy grounds. **Environmental Evaluation** Issues relating to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) arise in a more limited but nonetheless notable number of submissions concerning Adamstown SDZ West. Where SEA is referenced, it is generally raised in the context of cumulative environmental impacts associated with the scale and concentration of development in Lucan, Adamstown and Clonburris, rather than as a critique of individual technical findings or methodologies. Several submissions question whether the cumulative effects of successive rezonings and SDZ build-out across the Lucan–Adamstown area have been adequately captured at a strategic level through the envrionemntal assessment process. These submissions argue that while individual proposals may each be assessed as acceptable in isolation, their combined impact—when layered over existing and ongoing development—may give rise to	requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals The Planning Authority also notes submissions referencing concerns about infrastructure resilience arising from climate change and population growth. These matters will be addressed through the masterplanning process and detailed design in collaboration with key stakeholders. *Quality of Life and Perception of Planning* A number of submissions raise broader issues relating to quality of life, public safety, antisocial behaviour and community confidence. Such concerns are recognised as multifaceted and influenced by a range of factors, including population change, service delivery, urban management and policing, many of which extend beyond the scope of land-use zoning alone. Nonetheless, the Planning Authority considers that a plan-led approach incorporating phasing, community infrastructure delivery, transport planning and urban design quality is central to addressing these wider concerns. Overall, the Council is satisfied that the proposed zoning of Adamstown SDZ West, when read in conjunction with the amended SLO, SEA-informed mitigation measures, internal specialist consultation, and the protections contained within the County Development Plan and national legislation, provides a robust framework to safeguard heritage assets, manage infrastructure provision and address broader community considerations. **Environmental Evaluation**

environmental effects greater than those identified through site-by-site assessment. This cumulative concern is particularly expressed in relation to traffic-related emissions, pressure on sensitive environmental receptors, incremental loss of green infrastructure, and declining environmental quality. A recurring theme in SEA-related submissions is the perception that incremental rezonings contribute to a broader pattern of environmental change that, in the view of submitters, risks exceeding sustainable thresholds. In this regard, submissions frequently reference the ongoing delivery of Adamstown SDZ, the emerging Clonburris SDZ and additional proposed zoning at Adamstown SDZ West as part of a single development trajectory whose long-term environmental implications require careful strategic consideration. Some respondents express concern that the pace of rezonings may outstrip the ability of mitigation measures to offset cumulative impacts. Environmental topics most commonly cited in this SEA context include air quality impacts arising from traffic growth, climate-related considerations linked to car dependency, loss or fragmentation of green space, and pressure on biodiversity and landscape character. While these matters are often addressed elsewhere in submissions under specific headings (traffic, biodiversity, green infrastructure), they are also raised as indicators that wider strategic	The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Tubber Lane North. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. The issues raised by the submissions as they related to the SEA were further reviewed by the consultants who undertook the assessments to ensure a robust analysis of the site pending consideration of same as part of the variation process. The suggestion is to amend CS7 SLO5 to include: b. *Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by EcIA and SDCC will support the maintenance of such habitat as a refuge for wildlife.* c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.

environmental objectives may be at risk if cumulative development is not fully integrated into the SEA framework. Importantly, submissions addressing SEA do not generally dispute that an SEA process has been undertaken, nor do they typically identify procedural deficiencies. Rather, the concerns focus on the perceived adequacy of the assessment in capturing cumulative and long-term effects, particularly where rezonings occur adjacent to, or layered upon, large-scale SDZ development. In this sense, SEA-related submissions tend to advocate for a more precautionary and integrative approach to future zoning decisions, ensuring that environmental considerations are continuously re-evaluated as part of an evolving development strategy. Overall, SEA issues raised in submissions in respect of Adamstown SDZ West are strategic in nature and reflect broader apprehension about cumulative environmental change rather than site-specific environmental constraints. The emphasis is placed on ensuring that future development decisions are grounded in a comprehensive understanding of cumulative impacts across Lucan and Adamstown, and that strategic environmental objectives relating to climate, biodiversity, mobility and environmental quality remain central to plan-making as development continues.	**CE Recommendation** Amend wording of the SLO no. CS7 SLO5 to reflect requirement to ensure adequate protect of environmental sensitives: **b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by EcIA and SDCC will support the maintenance of such habitat as a refuge for wildlife.** **c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.** Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. It is important to note that there are a number of related projects, such as, BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater

	management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process.' Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The subject lands at the Adamstown West are appropriate lands to meet these objectives. The Planning Authority considers that the proposed zoning and associated SLO provide an appropriate,

	proportionate and policy-aligned framework for the development of these lands, reflecting their scale, location and relationship to the established Adamstown SDZ. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

CE Recommendation

Amend wording of the SLO no. CS7 SLO4:

Development on RES-N zoned lands to the west of Adamstown SDZ shall comply with the following:

1. Development may not commence until DART+ South West **or an equivalent rail service** has commenced construction **or operation, as may be relevant.**
2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.
3. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia:

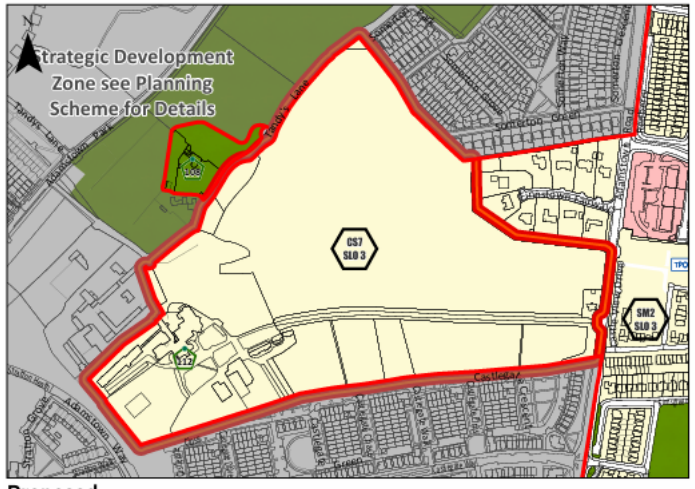
a. Retention and enhancement of the east-west hedgerow in the northern part of the site as recorded on 1st Edition OS maps, unless required for wider movement needs,

b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by EcIA and SDCC will support the maintenance of such habitat as a refuge for wildlife.

c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.
d. A Social Infrastructure Audit and provision within development proposals to address any needs identified,
e. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact,
f. A Public Open Space Audit to inform proposals for public open space and recreational facilities, ~~and~~
g. Provision for future infrastructure and access connections to lands to the south and west, including reservation for a future vehicular bridge over the railway line, unless determined otherwise in writing by the planning authority**; and**
h. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth.

AMENDMENT NO. 3 - FINNSTOWN CASTLE

Existing



Proposed

Submission No.

SD-C401-CDP25-1 – Joey Byrne

SD-C401-CDP25-4 – Aleksandra Dolhy

SD-C401-CDP25-6 – Miroslaw Kozina

SD-C401-CDP25-8 – Marc Fitzharris

SD-C401-CDP25-12 – Eimear Crowther Crowther

SD-C401-CDP25-13 – Brid Byrne

SD-C401-CDP25-15 – Domenico Locatelli

SD-C401-CDP25-16 – Igor Shcherba Shcherba

SD-C401-CDP25-25 – Deirdre Sadler

SD-C401-CDP25-27 – Aleksandr Novak

SD-C401-CDP25-30 – David Lane

SD-C401-CDP25-32 – Graham Forde

SD-C401-CDP25-33 – Matthew McCann

SD-C401-CDP25-36 – Daren O Brien

SD-C401-CDP25-38 – danielle cole

SD-C401-CDP25-39 – Jorge Collado	SD-C401-CDP25-41 – Ilya Ustinov	SD-C401-CDP25-42 – Kate Taylor
SD-C401-CDP25-44 – Ciaran Henry	SD-C401-CDP25-45 – Nicola Henry	SD-C401-CDP25-46 – Ruth French
SD-C401-CDP25-47 – Sinead Nolan Nolan	SD-C401-CDP25-51 – David McNamara	SD-C401-CDP25-55 – Catherine Coyne
SD-C401-CDP25-56 – Cathal Nolan	SD-C401-CDP25-62 – Patrick Kenna	SD-C401-CDP25-69 – Nicky Weir
SD-C401-CDP25-70 – Emmet Rafferty	SD-C401-CDP25-71 – Emmet Rafferty	SD-C401-CDP25-74 – Sophie Henry
SD-C401-CDP25-75 – Kathryn Murray	SD-C401-CDP25-76 – Janaina Oliveira	SD-C401-CDP25-78 – Diane O'Connell
SD-C401-CDP25-83 – Aisling Murphy	SD-C401-CDP25-85 – James Delaney	SD-C401-CDP25-87 – Noelle Whelan
SD-C401-CDP25-89 – Francisca Moules Darcy	SD-C401-CDP25-92 – Jagadish Mahadevan	SD-C401-CDP25-94 – Julie Monahan
SD-C401-CDP25-95 – Kate Henry	SD-C401-CDP25-96 – Darren Brennan	SD-C401-CDP25-101 – Thomas Woods
SD-C401-CDP25-104 – Kim McCrave	SD-C401-CDP25-106 – Marcia McDonagh	SD-C401-CDP25-110 – Anna Chrysovergi
SD-C401-CDP25-112 – Elaine McConnell	SD-C401-CDP25-114 – Joe Byrne	SD-C401-CDP25-116 – Áine Byrne
SD-C401-CDP25-117 – Brid McCormack	SD-C401-CDP25-118 – Aoife Flood	SD-C401-CDP25-119 – Maude Mcmenamin
SD-C401-CDP25-121 – Hanna Varghese	SD-C401-CDP25-122 – julieanne anderson	SD-C401-CDP25-124 – Isabella Fitzsimons

SD-C401-CDP25-126 – Laoibhse Curtis	SD-C401-CDP25-129 – Aoibheann Mcshea	SD-C401-CDP25-146 – Orla Kelly
SD-C401-CDP25-148 – Cronan Dooley	SD-C401-CDP25-149 – Áine Gallagher	SD-C401-CDP25-151 – swapni padamwar
SD-C401-CDP25-152 – Babar Sherwani	SD-C401-CDP25-153 – Isabel Arboleda	SD-C401-CDP25-154 – David Ward
SD-C401-CDP25-157 – Zelda Cunningham	SD-C401-CDP25-158 – Aidana Kappar	SD-C401-CDP25-162 – Allan Dwyer
SD-C401-CDP25-166 – Elaine O'Hare	SD-C401-CDP25-167 – Sharon Carroll	SD-C401-CDP25-170 – Kevin Donoghue
SD-C401-CDP25-173 – Irene OShea	SD-C401-CDP25-177 – Anand RAJAGOPALAN	SD-C401-CDP25-178 – NIranjana Rajagopalan
SD-C401-CDP25-182 – Terri Moloney	SD-C401-CDP25-183 – Kelley Dunleavy	SD-C401-CDP25-184 – Sean Young
SD-C401-CDP25-185 – Caroline Hogarty	SD-C401-CDP25-186 – Danijela Klopotan	SD-C401-CDP25-190 – Dara-Jane Ruane
SD-C401-CDP25-197 – Simon Dowling	SD-C401-CDP25-200 – Sofia Alberty	SD-C401-CDP25-206 – Louise Heffernan
SD-C401-CDP25-210 – Emmet Rafferty	SD-C401-CDP25-211 – jorgea rafferty	SD-C401-CDP25-214 – Maureen Young
SD-C401-CDP25-224 – John Brennan	SD-C401-CDP25-227 – Emma Gavin	SD-C401-CDP25-228 – Denise Collins
SD-C401-CDP25-229 – Margaret Dennehy	SD-C401-CDP25-232 – Agnieska Nieduelaic	SD-C401-CDP25-233 – Alan McKiernan

SD-C401-CDP25-234 – Eamon McKiernan	SD-C401-CDP25-236 – Catherine Murphy	SD-C401-CDP25-238 – Ian Boyle
SD-C401-CDP25-239 – Joe Reynolds	SD-C401-CDP25-240 – John Farrell	SD-C401-CDP25-241 – Kieran Farrell
SD-C401-CDP25-243 – Mary Geraghty	SD-C401-CDP25-244 – Michael Mahon	SD-C401-CDP25-245 – Paul Henry
SD-C401-CDP25-246 – Catherine Kelly	SD-C401-CDP25-247 – Robert McMahon	SD-C401-CDP25-249 – Gavin Pacini
SD-C401-CDP25-252 – Ruth Keane Reid	SD-C401-CDP25-253 – Stephen Bennet	SD-C401-CDP25-254 – Gillian Gilbert
SD-C401-CDP25-258 – Greg Lonergan	SD-C401-CDP25-267 – Tina Lewis	SD-C401-CDP25-273 – Patrick Bradshaw
SD-C401-CDP25-282 – John Kelly	SD-C401-CDP25-301 – Terry Keane	SD-C401-CDP25-302 – Teresa Lynch
SD-C401-CDP25-304 – Tom O' FGlynn	SD-C401-CDP25-306 – aoife rafter	SD-C401-CDP25-307 – David Francis
SD-C401-CDP25-308 – Michael Dwyer	SD-C401-CDP25-309 – Mario Ilha	SD-C401-CDP25-310 – Neasa Henry
SD-C401-CDP25-313 – Jennifer Harte	SD-C401-CDP25-314 – Mridula Kandavel	SD-C401-CDP25-316 – Priya Arvind
SD-C401-CDP25-318 – Fearghal Lawlor	SD-C401-CDP25-320 – Karl Meehan	SD-C401-CDP25-330 – Sarah McDermott
SD-C401-CDP25-331 – Hugh McKiernan	SD-C401-CDP25-335 – ian mclaughlin	SD-C401-CDP25-336 – Kieron Byrne

SD-C401-CDP25-339 – Alyson Brady	SD-C401-CDP25-340 – Dolores Donnelly	SD-C401-CDP25-341 – Catherine Lane
SD-C401-CDP25-342 – Marian Laffan	SD-C401-CDP25-345 – Eileen Sheahan-mclaughlin	SD-C401-CDP25-349 – Angela Kelly
SD-C401-CDP25-350 – Liam Byrne	SD-C401-CDP25-351 – Aoife Byrne	SD-C401-CDP25-352 – Derek Byrne
SD-C401-CDP25-353 – Carl Humphreys	SD-C401-CDP25-354 – Carmel Byrne	SD-C401-CDP25-356 – Susan Kavanagh
SD-C401-CDP25-358 – Katie Hynes	SD-C401-CDP25-359 – Shane Nestor	SD-C401-CDP25-362 – Barry Deegan
SD-C401-CDP25-364 – Stephen Mason	SD-C401-CDP25-365 – Syed Ibrahim Shahul Hameed	SD-C401-CDP25-368 – Orla Flanagan
SD-C401-CDP25-371 – Emilia Drzewiecka	SD-C401-CDP25-372 – Kayleigh Fox	SD-C401-CDP25-374 – Antoinette Fox
SD-C401-CDP25-378 – Joseph Fox	SD-C401-CDP25-381 – Valerie O'Neill	SD-C401-CDP25-384 – Miriam Cuesta Moratinos
SD-C401-CDP25-385 – Mary Maloney	SD-C401-CDP25-386 – Justyna Zajakala	SD-C401-CDP25-387 – Philip Kavanagh
SD-C401-CDP25-388 – Robert Maloney	SD-C401-CDP25-390 – Emer Maloney	SD-C401-CDP25-391 – Pat Lennon
SD-C401-CDP25-393 – Aisling Lennon	SD-C401-CDP25-395 – Fiona Wolfe	SD-C401-CDP25-397 – Brendan Lennon
SD-C401-CDP25-398 – Terry Abbott	SD-C401-CDP25-399 – Joan Stokes	SD-C401-CDP25-406 – Joe Whyte

SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-412 – Colette McParland	SD-C401-CDP25-413 – Vivek Soni
SD-C401-CDP25-414 – niall oneill	SD-C401-CDP25-418 – Michael Delany	SD-C401-CDP25-419 – Allison Davis
SD-C401-CDP25-422 – Soyel Alam	SD-C401-CDP25-423 – Sagar Raturi	SD-C401-CDP25-425 – Claire Keogh
SD-C401-CDP25-426 – Aidan Brennan	SD-C401-CDP25-428 – Bernadette Boylan	SD-C401-CDP25-429 – Stuart Campbell
SD-C401-CDP25-430 – Katie McCourt	SD-C401-CDP25-431 – Lorna Quinn	SD-C401-CDP25-434 – Katarzyna Czarzasta
SD-C401-CDP25-436 – Glenn Tubbert	SD-C401-CDP25-437 – Carmel Dwan	SD-C401-CDP25-445 – Karen Muir
SD-C401-CDP25-446 – Fiachra Brennan	SD-C401-CDP25-448 – Seun Ogunkunle	SD-C401-CDP25-450 – Adrienne Doherty
SD-C401-CDP25-460 – Evans Kipchaui	SD-C401-CDP25-462 – Ciara Dardis	SD-C401-CDP25-463 – Alan Tolan
SD-C401-CDP25-469 – Patricia Graham	SD-C401-CDP25-474 – Una Howley	SD-C401-CDP25-476 – Emily Wykes
SD-C401-CDP25-480 – Joy Hearn	SD-C401-CDP25-482 – Maciej Zajakala	SD-C401-CDP25-483 – Enda Haughey
SD-C401-CDP25-484 – Lucian Irimie	SD-C401-CDP25-492 – Barbara Kenna	SD-C401-CDP25-496 – Roger Cromer
SD-C401-CDP25-499 – Fiona Dwyer	SD-C401-CDP25-501 – Pat O Dwyer	SD-C401-CDP25-506 – Neal Murphy
SD-C401-CDP25-507 – Paul Sharkey	SD-C401-CDP25-527 – Gordon Dowling	SD-C401-CDP25-528 – Natasha Bartlett

SD-C401-CDP25-530 – Micheál Boland	SD-C401-CDP25-534 – Julie Keane	SD-C401-CDP25-536 – emilian dackiewicz
SD-C401-CDP25-541 – Owen McCabe	SD-C401-CDP25-546 – Mirjana Kutijevac	SD-C401-CDP25-547 – Mirjana Kutijevac
SD-C401-CDP25-556 – Elzbieta Musial	SD-C401-CDP25-558 – Kevin Fitzgerald	SD-C401-CDP25-562 – Paula Addison
SD-C401-CDP25-563 – Neasa O'Rourke	SD-C401-CDP25-566 – teresa brennan	SD-C401-CDP25-569 – Ian O'Leary
SD-C401-CDP25-570 – Praveen Balla	SD-C401-CDP25-576 – Magda Ghanim	SD-C401-CDP25-580 – Ronan Conroy
SD-C401-CDP25-584 – Amit Sharma	SD-C401-CDP25-586 – Mark Moran	SD-C401-CDP25-588 – Ali Madras
SD-C401-CDP25-590 – Raymond blairsdale	SD-C401-CDP25-594 – Rupert Fuller	SD-C401-CDP25-598 – Darren Kenny
SD-C401-CDP25-600 – Valeria Luciane Okano Halila	SD-C401-CDP25-601 – Hayley McLoughlin	SD-C401-CDP25-603 – Loe Antonio de Souza Lobo
SD-C401-CDP25-614 – Niamh Power	SD-C401-CDP25-618 – Julie Edwards	SD-C401-CDP25-628 – Emma Murphy
SD-C401-CDP25-632 – Joseph Gavin	SD-C401-CDP25-633 – Eoin Lanigan	SD-C401-CDP25-634 – Sean and Catherine Giblin
SD-C401-CDP25-641 – Miriam Gavin	SD-C401-CDP25-642 – Sinéad Mcintyre	SD-C401-CDP25-644 – Grace Carey
SD-C401-CDP25-649 – Westbury Court Residents Association	SD-C401-CDP25-653 – Sarah Ann Mulqueen	SD-C401-CDP25-658 – Fergus Dunne

SD-C401-CDP25-659 – Sean Dowling	SD-C401-CDP25-661 – Geraldine Walsh	SD-C401-CDP25-662 – Kieran Hallinan Hallinan
SD-C401-CDP25-663 – Deirdre Dowling	SD-C401-CDP25-665 – Joe Murphy	SD-C401-CDP25-668 – CORMAC MC CARTHY
SD-C401-CDP25-671 – Conor Doyle	SD-C401-CDP25-672 – Peter Anderson	SD-C401-CDP25-678 – Brendan Sweeney
SD-C401-CDP25-679 – Joanne O'Flynn	SD-C401-CDP25-685 – Ronan Brannigan	SD-C401-CDP25-687 – Esther Monahan
SD-C401-CDP25-688 – Andrew Tully	SD-C401-CDP25-690 – eric neville	SD-C401-CDP25-693 – Naomi Anderson
SD-C401-CDP25-695 – Sharon Holland	SD-C401-CDP25-696 – Maryna Chyharova	SD-C401-CDP25-697 – Esther Kocsis
SD-C401-CDP25-699 – Veronica McCallum	SD-C401-CDP25-702 – Eileen Dennehy	SD-C401-CDP25-704 – Lucy Jordan
SD-C401-CDP25-706 – Mick May	SD-C401-CDP25-711 – Catherine O' Donnell	SD-C401-CDP25-712 – Neil Homan
SD-C401-CDP25-713 – John O'Donnell	SD-C401-CDP25-715 – Peter McCabe	SD-C401-CDP25-718 – Mary McCabe
SD-C401-CDP25-720 – Sophie Dennehy	SD-C401-CDP25-721 – Philip Dennehy	SD-C401-CDP25-723 – Norman Carroll
SD-C401-CDP25-725 – Norman Carroll	SD-C401-CDP25-727 – James Anderson	SD-C401-CDP25-732 – Ed Corkery

SD-C401-CDP25-740 – Ann Nealon	SD-C401-CDP25-741 – Fergus Carey	SD-C401-CDP25-743 – Paula McMahon
SD-C401-CDP25-747 – Catherine Carey	SD-C401-CDP25-750 – Pauline Bligh	SD-C401-CDP25-751 – Mary Anderson
SD-C401-CDP25-753 – Joseph Bligh	SD-C401-CDP25-756 – Pádraic Slavin	SD-C401-CDP25-758 – Alice Whyte
SD-C401-CDP25-764 – John Harper	SD-C401-CDP25-765 – Mairead Byrne	SD-C401-CDP25-775 – Sandra Bredin
SD-C401-CDP25-776 – Mary Whittle	SD-C401-CDP25-777 – Little Folk Preschool	SD-C401-CDP25-779 – Stephanie Monaghan
SD-C401-CDP25-783 – Sarah Owen	SD-C401-CDP25-785 – Susan Brophy	SD-C401-CDP25-786 – Sinead Wallace
SD-C401-CDP25-790 – David Hargadon	SD-C401-CDP25-797 – Mary C	SD-C401-CDP25-823 – Laura Brophy
SD-C401-CDP25-825 – Jennifer Merriman	SD-C401-CDP25-834 – A FARRELL	SD-C401-CDP25-837 – Ken Goodwin
SD-C401-CDP25-838 – Ray Barnes	SD-C401-CDP25-841 – David Kilgannon	SD-C401-CDP25-847 – Grace Lavery O'Reilly
SD-C401-CDP25-849 – Adrienne Sullivan	SD-C401-CDP25-859 – Finnian Ward	SD-C401-CDP25-877 – Irish Water
SD-C401-CDP25-879 – Gemma Collins	SD-C401-CDP25-883 – Eoin McDonagh	SD-C401-CDP25-884 – Dermot Keogh
SD-C401-CDP25-887 – Nina Healy	SD-C401-CDP25-890 – Anne Maher	SD-C401-CDP25-894 – Kevin Maher
SD-C401-CDP25-897 – Mark Lester	SD-C401-CDP25-901 – Carol Lester	SD-C401-CDP25-904 – Samantha Jordan

SD-C401-CDP25-906 – Brendan Hanley	SD-C401-CDP25-911 – Richard Whelan	SD-C401-CDP25-912 – glenn roche
SD-C401-CDP25-920 – Peter Keogh	SD-C401-CDP25-921 – Oksana Abrosimova	SD-C401-CDP25-924 – Helen O'Shea
SD-C401-CDP25-940 – Dhirendra kumar Rawal	SD-C401-CDP25-942 – Fiachra McGrath	SD-C401-CDP25-949 – Marian Henry
SD-C401-CDP25-956 – Jennifer Begley	SD-C401-CDP25-966 – Jill Meredith	SD-C401-CDP25-969 – Dermot McGreal
SD-C401-CDP25-986 – Neil Martin	SD-C401-CDP25-997 – Philip & Claire Bowler	SD-C401-CDP25-1002 – Martin McHugh
SD-C401-CDP25-1003 – John Coleman	SD-C401-CDP25-1006 – Roisin Hayden	SD-C401-CDP25-1021 – Barry Kennedy
SD-C401-CDP25-1043 – Matt Lavery-O'Reilly	SD-C401-CDP25-1053 – Mary Davis	SD-C401-CDP25-1063 – Magdalena Lemanska
SD-C401-CDP25-1064 – Mary Jenkins	SD-C401-CDP25-1079 – Orla Duke	SD-C401-CDP25-1085 – Pooja Dornadhula
SD-C401-CDP25-1087 – claire Levingstone	SD-C401-CDP25-1088 – Una Duke	SD-C401-CDP25-1094 – Deborah Mahon
SD-C401-CDP25-1117 – Megan Fox	SD-C401-CDP25-1118 – Anita Cahill	SD-C401-CDP25-1120 – Tom Moriarty
SD-C401-CDP25-1132 – Kevin Derrig	SD-C401-CDP25-1136 – Peter McCallum	SD-C401-CDP25-1147 – Brian Doherty

SD-C401-CDP25-1155 – Louise Brogan	SD-C401-CDP25-1159 – David Whittle	SD-C401-CDP25-1160 – Ashleigh D'Arcy
SD-C401-CDP25-1162 – Jake Whelan	SD-C401-CDP25-1167 – Inland Fisheries Ireland	SD-C401-CDP25-1173 – Tina Dwyer
SD-C401-CDP25-1174 – Aine Maguire	SD-C401-CDP25-1179 – Floriana Stomeo	SD-C401-CDP25-1187 – Local Resident
SD-C401-CDP25-1193 – Priya Parameswaran	SD-C401-CDP25-1194 – Ciara Tully	SD-C401-CDP25-1197 – Sandra M
SD-C401-CDP25-1202 – Celine Kiernan	SD-C401-CDP25-1214 – Andrew Dunne	SD-C401-CDP25-1219 – Denis Twohig
SD-C401-CDP25-1233 – Sarah Casey	SD-C401-CDP25-1234 – Robert Anderson	SD-C401-CDP25-1239 – Cllr. Helen Farrell
SD-C401-CDP25-1247 – Leslie Codeghini	SD-C401-CDP25-1253 – Sara Eslami	SD-C401-CDP25-1260 – David Kinsella
SD-C401-CDP25-1267 – Louise C	SD-C401-CDP25-1269 – Deirdre McIntyre	SD-C401-CDP25-1270 – Marcel Notenboom
SD-C401-CDP25-1271 – Karen Kinsella	SD-C401-CDP25-1272 – Joanna Kuruc	SD-C401-CDP25-1279 – Colette O'Sullivan
SD-C401-CDP25-1284 – John Higgins	SD-C401-CDP25-1290 – Elzbieta Musial	SD-C401-CDP25-1293 – Anum Alam Khan
SD-C401-CDP25-1294 – Ali Madras	SD-C401-CDP25-1297 – Audrey Smith	SD-C401-CDP25-1298 – Alan Barrett

SD-C401-CDP25-1300 – Subhendu Mohapatra	SD-C401-CDP25-1304 – Alena Kliuchnik	SD-C401-CDP25-1305 – Geraldine Lavin
SD-C401-CDP25-1312 – Moya Shields	SD-C401-CDP25-1314 – Miriam Whittle	SD-C401-CDP25-1315 – E.M Hurley
SD-C401-CDP25-1325 – Siobhan Nolan	SD-C401-CDP25-1328 – Abhijit Misra	SD-C401-CDP25-1332 – Syed Ibrahim Shahul Hameed
SD-C401-CDP25-1339 – JAKUB SITKO	SD-C401-CDP25-1341 – Keith Davis	SD-C401-CDP25-1342 – Tiernan O'Brien
SD-C401-CDP25-1349 – Paul O’Sullivan	SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1358 – Katie Moore
SD-C401-CDP25-1363 – Kiran Shah	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1370 – Linda Tapley
SD-C401-CDP25-1371 – Dilmeen Kaur	SD-C401-CDP25-1372 – Gary Mitchell	SD-C401-CDP25-1374 – Sachin Gupta
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1377 – Colette Shirley	SD-C401-CDP25-1385 – Dominik Musial
SD-C401-CDP25-1388 – karen hayes	SD-C401-CDP25-1390 – Stephen T	SD-C401-CDP25-1392 – Nasim Mahmud
SD-C401-CDP25-1395 – Karim AL SRAG	SD-C401-CDP25-1399 – Dan Collins	SD-C401-CDP25-1403 – Deb Roy
SD-C401-CDP25-1408 – Frederic Dupont	SD-C401-CDP25-1413 – Gerry O'Connell	SD-C401-CDP25-1414 – Sharifa Sultana
SD-C401-CDP25-1415 – Neil Kelly	SD-C401-CDP25-1418 – J Phelan	SD-C401-CDP25-1420 – Derek Tomney

SD-C401-CDP25-1421 – Lesley Dupont	SD-C401-CDP25-1427 – Laura Byrne	SD-C401-CDP25-1432 – Sergio Fraile
SD-C401-CDP25-1433 – Ciara Mc Nelis	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1440 – Alan Holmes
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1447 – Marica Fisher
SD-C401-CDP25-1450 – Edina Almasi	SD-C401-CDP25-1454 – Martin Kelly	SD-C401-CDP25-1456 – Donal Curran
SD-C401-CDP25-1457 – Patrick Stapleton	SD-C401-CDP25-1460 – Patrick Stapleton	SD-C401-CDP25-1461 – Malik Irfan
SD-C401-CDP25-1462 – Tessa Curran	SD-C401-CDP25-1466 – Ariane Hannon	SD-C401-CDP25-1468 – Olivier Mantoulan
SD-C401-CDP25-1472 – Dileswar Patra	SD-C401-CDP25-1475 – Patrick Brodie	SD-C401-CDP25-1476 – Liz Stapleton
SD-C401-CDP25-1478 – Bibin Madhu	SD-C401-CDP25-1482 – Aidan Walsh	SD-C401-CDP25-1484 – Elizabeth Nolan
SD-C401-CDP25-1486 – ZAHRA SIDDIQA	SD-C401-CDP25-1488 – Armstrong Fenton Ltd	SD-C401-CDP25-1507 – Karina ODonnell
SD-C401-CDP25-1508 – Katarzyna Szpinder	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1514 – Aydin Ulas
SD-C401-CDP25-1517 – Vijay Gill	SD-C401-CDP25-1518 – Selena Byrne	SD-C401-CDP25-1520 – Basmah Aziz
SD-C401-CDP25-1523 – Kevin Farrell	SD-C401-CDP25-1529 – Santosh Nair	SD-C401-CDP25-1537 – Sandra Coleman

SD-C401-CDP25-1538 – Rodel Rodriguez	SD-C401-CDP25-1541 – Maciej Szpinder	SD-C401-CDP25-1555 – Brian Sheehan
SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1561 – Der O'Rourke	SD-C401-CDP25-1565 – Monika Wrobel
SD-C401-CDP25-1569 – Catherine Brangan	SD-C401-CDP25-1570 – Aine Kennedy	SD-C401-CDP25-1571 – Eimear kennedy
SD-C401-CDP25-1577 – Victoria Creighton	SD-C401-CDP25-1578 – Sunil Vasudeva	SD-C401-CDP25-1589 – An Claíomh Glas & Lucan Planning Council
SD-C401-CDP25-1590 – Siarhei Bobysh	SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1594 – Sara Feeney
SD-C401-CDP25-1596 – Fiona O'Brien	SD-C401-CDP25-1598 – Ruby K K Sandhu	SD-C401-CDP25-1600 – Agnieszka Trzos
SD-C401-CDP25-1601 – Kevin Horan	SD-C401-CDP25-1602 – Suzanne Fitzpatrick	SD-C401-CDP25-1605 – Eleonore McKinney
SD-C401-CDP25-1607 – Gráinne O’Leary	SD-C401-CDP25-1608 – Manami Greene	SD-C401-CDP25-1613 – Fintan Tait
SD-C401-CDP25-1614 – Liam Hendrick	SD-C401-CDP25-1615 – Elmuntasir Elhadi	SD-C401-CDP25-1617 – Pearse Carberry
SD-C401-CDP25-1618 – Paddy Keating	SD-C401-CDP25-1619 – Darragh Begley	SD-C401-CDP25-1620 – Bhawna Rana

SD-C401-CDP25-1621 – Tomasz Lemanski	SD-C401-CDP25-1623 – Melissa Griffin	SD-C401-CDP25-1625 – Roger Griffin
SD-C401-CDP25-1628 – Sharon Kirwan	SD-C401-CDP25-1629 – Dan Barjovanu	SD-C401-CDP25-1630 – Graham Healy
SD-C401-CDP25-1635 – Martina Dunne	SD-C401-CDP25-1637 – Sophia Byrne	SD-C401-CDP25-1639 – Carmel Callaghan
SD-C401-CDP25-1643 – Tara Ryan	SD-C401-CDP25-1650 – Geraldine Kennedy Geraldine Kennedy	SD-C401-CDP25-1651 – Catriona Wheeler
SD-C401-CDP25-1654 – Rick Cuyugan	SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1658 – Samantha Yang
SD-C401-CDP25-1659 – Declan Rooney	SD-C401-CDP25-1661 – Aisling Collins	SD-C401-CDP25-1662 – Vitali Baranouski
SD-C401-CDP25-1665 – Irina Roy	SD-C401-CDP25-1668 – Gerard Jenkins	SD-C401-CDP25-1669 – Damien Moloney
SD-C401-CDP25-1671 – Licel Codeghini	SD-C401-CDP25-1672 – Javier Ayala	SD-C401-CDP25-1673 – Ashwani Kumar
SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1677 – Janet Carty	SD-C401-CDP25-1679 – Mirjana Kutijevac
SD-C401-CDP25-1681 – Roopesh Harinath	SD-C401-CDP25-1683 – Neha Gupta	SD-C401-CDP25-1684 – Aoife Kirwan
SD-C401-CDP25-1686 – Claire Colohan	SD-C401-CDP25-1687 – Nicola Mahoney	SD-C401-CDP25-1690 – Gillian Crowe

SD-C401-CDP25-1691 – Claire Colohan	SD-C401-CDP25-1693 – Sheetal Shah	SD-C401-CDP25-1698 – Fiona Lambe
SD-C401-CDP25-1699 – James White	SD-C401-CDP25-1700 – STANLEY PAUL BLESSING WILLIAM	SD-C401-CDP25-1705 – Kirill Priadko
SD-C401-CDP25-1707 – Clare Wright	SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1713 – Ramanathan Gowrishankar
SD-C401-CDP25-1714 – Jayaram Mani	SD-C401-CDP25-1715 – Maria Murphy	SD-C401-CDP25-1718 – Shaila Prabhu
SD-C401-CDP25-1719 – Amit Sharma	SD-C401-CDP25-1723 – Ranjana Sharma	SD-C401-CDP25-1725 – Department of Education and Youth
SD-C401-CDP25-1726 – Elizabeth Chacko	SD-C401-CDP25-1727 – Ajai Govind Govindan	SD-C401-CDP25-1728 – Divya Melvin Puthumana
SD-C401-CDP25-1729 – Jennifer Williams	SD-C401-CDP25-1730 – Ratna Paladugu	SD-C401-CDP25-1732 – Aarsh Shah
SD-C401-CDP25-1733 – Golda Thomas	SD-C401-CDP25-1736 – UnniKrishnan Erukattil	SD-C401-CDP25-1739 – H Smyth
SD-C401-CDP25-1740 – Ajin Nair	SD-C401-CDP25-1742 – Renjana Mathew	SD-C401-CDP25-1743 – Zainab Javaid
SD-C401-CDP25-1744 – Anthony Williams	SD-C401-CDP25-1746 – Ciaran OToole	SD-C401-CDP25-1747 – Ben Healy
SD-C401-CDP25-1749 – Julie Husman	SD-C401-CDP25-1751 – Yanliu Ma	SD-C401-CDP25-1752 – John McGivney
SD-C401-CDP25-1760 – Laura Doyle	SD-C401-CDP25-1765 – Kenneth Lavin	SD-C401-CDP25-1766 – Yuvraj Shah

SD-C401-CDP25-1772 – Philip Curran	SD-C401-CDP25-1800 – Anne Graham	SD-C401-CDP25-2001 – Ben O Byrne
SD-C401-CDP25-2262 – Dympna Hudson	SD-C401-CDP25-2432 – Katie Murnaghan	

Summary	CE Response
Overview A range of additional issues are raised that fall outside discrete land-use policy categories but are used collectively to reinforce opposition to further rezoning. These include concerns relating to mental health, quality of life deterioration and community wellbeing, particularly in the context of congestion, loss of green space and reduced access to services. Some submissions also reference antisocial behaviour and increasing social pressures, linking these to over-concentration of development without commensurate community infrastructure. A recurring theme is the erosion of trust in the planning system, with residents citing historically undelivered or delayed infrastructure commitments in Adamstown and the wider Lucan area as evidence that future delivery assurances should not be relied upon. Taken together, these miscellaneous issues do not introduce new policy objections but are used to illustrate the cumulative social and environmental impacts of further development. Submissions consistently argue that these qualitative impacts—while difficult to measure—are deeply felt by residents and should be given significant weight in	This amendment is in relation to the designation of lands at Finnstown Castle, that are currently zoned Objective OS to a RES under Variation No. 2 of the South Dublin County Development Plan 2022-2028. CS7 SLO3 attached to the Variation requires for the lands to comply with the following: Development on RES zoned lands at Finnstown Castle shall comply with the following: 1. Development may not commence until DART+ South West has commenced construction. 2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. 3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia: a. Retention and enhancement of the hedgerow and tree line on the north-western boundary of the site as recorded on 1st Edition OS maps,

assessing the appropriateness of further rezoning at Finnstown Castle. **Overdevelopment – Lucan Wide Cumulative Impact** Overdevelopment and disproportionate levels of development have been flagged as issues throughout the consultation submission received by SDCC. Key issues raised include: Disproportionate levels of zonings in certain areas (e.g. Lucan) Certain sites may be omitted from the proposed variation (e.g. Finnstown, Foxhunter, St. Edmunsbury etc.) Further to this, incorrect baseline figures and analysis have been suggested in submissions and used to undertake capacity audit . Additionally, it is also stated that adequate zoned land already exists within the county to meet current demand, contrary to capacity audit . The proposed variation is also suggested to undermine the SDCC own development plan. The topic of 'Overdevelopment' is dealt with in each of the various variation sites throughout this report, however, in a broader sense, the wider context is dealt with in some detail below to allow for wider consideration, notably in the comparative context of Lucan and Waterford, as well as how sites were selected. Submissions also raise consistent and strongly expressed concerns that the Lucan–Adamstown area	b. A Social Infrastructure Audit and provision within development proposals to address any needs identified, c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, d. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage, e. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and f. Provision for direct active travel connections from the subject lands into Adamstown SDZ. With regard to the subject lands the following is noted: The site is located directly east of Adamstown SDZ, with the northern and southern boundaries also encapsulated by the SDZ boundary. It is also located to the north of Clonburris SDZ and is accessed off the Newcastle Road. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines. required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit

is experiencing unsustainable levels of development, characterised by rapid population growth, disproportionate housing delivery, and inadequate supporting infrastructure. Residents emphasise that Lucan has undergone significant expansion over several decades, with population growth increasing from a small village of a few thousand in the 1980s, to approximately 15,000 by 1990, 57,000 by 2016, and circa 65,000 by 2026, largely driven by continuous residential development. This growth is frequently compared to that of a city, with Lucan now described as having a population broadly comparable to Waterford City, but without appropriate infrastructure, services or facilities. Concerns are further raised regarding density, noting that Lucan accommodates a similar population within a significantly smaller land area, resulting in a markedly more intense urban form. A key theme is the perception that Lucan and Adamstown have absorbed a disproportionate share of housing development within South Dublin, including the delivery of two Strategic Development Zones (Adamstown and Clonburris), with submissions highlighting that this is unique nationally. It is also noted that 64% of lands identified for additional development under Proposed Variation No. 2 are located within the Lucan–Adamstown area, reinforcing concerns regarding imbalanced spatial distribution of growth.	(SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Chief Executive progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP.

The cumulative pipeline of development is considered substantial, with thousands of units already delivered and significant additional capacity (including SDZ build-out lands and proposed rezonings) yet to be realised, potentially resulting in a further major increase in population. Submissions consistently assert that this level of growth has outpaced the delivery of critical infrastructure and services, resulting in existing deficits across multiple sectors. Transport infrastructure is identified as a primary constraint, with references to chronic congestion on the N4, Newcastle Road, Adamstown Road, R120 and within Lucan Village, where traffic is described as persistent throughout the day rather than limited to peak periods. Public transport is considered insufficient and unreliable, with overcrowded bus services, lack of rail or Luas connectivity, and the absence of a direct link to Dublin Airport highlighted as key failings. The projected growth associated with further rezonings is considered likely to exacerbate car dependency, congestion and associated environmental impacts. Similarly, significant pressure is identified on social infrastructure, including school capacity, childcare provision and healthcare services. Submissions refer to school place shortages, oversubscribed facilities, and limited GP availability, with many practices reportedly not accepting new patients. Community,	Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. **Overdevelopment – Lucan Wide Cumulative Impact** Submissions raise consistent and strongly held concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by cumulative population growth, a concentration of housing delivery, and infrastructure provision not keeping pace with development. The Planning Authority acknowledges that the Lucan–Adamstown area has experienced significant and sustained population growth over several decades, evolving from a small settlement into a major suburban population centre within the Dublin Metropolitan Area. The area forms part of a key growth corridor within the Dublin Metropolitan Area, where the availability of suitable and serviceable lands, including those proximate to existing and planned transport infrastructure, has been identified at regional and national level as critical to meeting housing demand. A central concern relates to the cumulative impact of development, with submissions asserting that population growth has outpaced the provision of critical infrastructure. Concerns relating to congestion on key transport routes, public transport capacity, and pressure on schools, childcare, healthcare and

recreational and sports facilities are also considered deficient relative to the size of the population, with recent examples cited of facilities reaching capacity shortly after opening. This is compounded by concerns regarding utilities and drainage infrastructure, with suggestions that some systems are already approaching or exceeding operational capacity. A further critical issue is the loss of remaining greenfield and high-amenity lands, particularly at locations such as St. Edmundsbury, Finnstown and other proposed sites. These lands are described as important for biodiversity, landscape character, recreation, and climate resilience, as well as forming part of the wider Liffey Valley green infrastructure network. Their rezoning is viewed as contributing to the progressive erosion of natural and environmental assets in an area already experiencing extensive urbanisation. Overall, the issue of overdevelopment is framed in terms of cumulative impact, with submissions arguing that continued rezoning, in advance of infrastructure delivery, represents a "housing-led" rather than "infrastructure-led" approach. The prevailing concern is that further development will intensify existing deficits, leading to declines in quality of life, increased congestion and environmental pressure, and an erosion of local	community facilities are recognised as part of the cumulative impact of growth in the area. Specific issues include traffic congestion on key routes such as the N4, Adamstown Road, Newcastle Road and within Lucan Village, alongside constraints in public transport capacity, including overcrowded bus services and reliance on future rail interventions. Submissions also highlight pressure on social infrastructure, including school places, childcare provision, healthcare services and community facilities, with references to oversubscription and capacity constraints. In addition, concerns are raised regarding the loss of greenfield lands and high-amenity areas, which are viewed as important for environmental quality, recreation and biodiversity. Submissions also raise concerns that a disproportionate quantum of lands identified under the proposed variation are located within the Lucan–Adamstown area. The Planning Authority acknowledges the perception that a disproportionate share of future development is directed to the Lucan area; however, the identification of lands is not based on geographic distribution, but on a rigorous, evidence-based assessment of suitability, infrastructure capacity, accessibility and alignment with national planning policy. In this regard, the availability of suitably located lands within the Dublin Metropolitan Area, including in Lucan–Adamstown, is a key factor in accommodating projected population growth. Submissions frequently draw comparisons with Waterford City to illustrate the scale of population growth; however, the Planning Authority considers that such comparisons require careful contextualisation. Waterford is designated under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) as a Regional City of Scale, with a defined

character and community cohesion, unless balanced by timely and proportionate investment in infrastructure and services. **Overdevelopment, Density, Housing, Policy, and Phasing** *Overdevelopment, Density and Phasing* Concerns relating to overdevelopment, density and phasing are closely interwoven throughout submissions on Finnstown Castle and are repeatedly framed as cumulative, location-specific and informed by past experience of growth within the wider Lucan–Adamstown wider area. A significant number of submissions raise strong objection to the anticipated scale and density of development associated with the proposed residential zoning of Finnstown Castle. Submissions frequently reference reported estimates of approximately 800–1,000 residential units being accommodated on the lands and argue that such density would be fundamentally incompatible with the local context. In particular, residents point to constrained road access via the R120 (Newcastle Road), the absence of alternative distributor routes, the proximity of a Protected Structure (Finnstown Castle) and well-documented shortages in schools, healthcare and community infrastructure. Many submissions state that the physical and social environment surrounding Finnstown lacks the	Metropolitan Area Strategic Plan (MASP) and a clear national policy objective to achieve significant population growth supported by targeted investment in infrastructure, regeneration and metropolitan-scale services. By comparison, the Lucan–Adamstown–Palmerstown area forms part of the wider Dublin Metropolitan Area, where growth is planned and distributed across the region in accordance with national housing targets and strategic planning policy, and where the availability of land and proximity to transport corridors are key determinants in shaping development patterns. The revised NPF provides for substantial population growth within the Eastern and Midland Region, reflecting Dublin's role as the primary engine of national population growth, while also supporting higher relative growth in regional cities to achieve balanced regional development. In this context, the Planning Authority considers that the proposed variation responds to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land be identified to meet increased and accelerated housing demand. Submissions question the necessity of proposed rezonings, with reference to the housing capacity identified in the South Dublin County Development Plan 2022–2028. While it is acknowledged that the Development Plan identified a substantial quantum of zoned land, subsequent to its adoption there have been significant changes in national planning policy, including the revised NPF and associated Section 28 Ministerial Guidelines. These guidelines require planning authorities to review their Core Strategy and zoning provisions to ensure alignment with updated

capacity to absorb development of this intensity without unacceptable impacts. Recent development typologies within Adamstown SDZ, especially high-density apartment schemes around Adamstown Railway Station, are frequently cited as evidence that density levels in the area have already exceeded what existing infrastructure can reasonably support. Submissions argue that while such development may align in principle with compact growth policy, the absence of fully functioning high-capacity public transport and supporting services has resulted in congestion, parking pressure and reduced quality of life. Against this backdrop, residents contend that further density at Finnstown Castle would amount to urban over-intensification rather than sustainable compact growth. Closely linked to density concerns are objections relating to phasing and sequencing of development. Submissions consistently draw on historic experience within Adamstown, where residents occupied homes years in advance of the delivery of schools, GP services, leisure facilities and transport upgrades. This experience is repeatedly cited as evidence of a failed “housing first, infrastructure later” approach. Residents argue that the proposed rezoning risks repeating this pattern, particularly where development is tied to future or commenced	housing targets and delivery requirements. In response, the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. This process included engagement with key internal departments and relevant infrastructure providers to ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development. The sites identified under the proposed variation were selected on the basis of this evidence-based assessment, having regard to their proximity to existing and planned infrastructure, their capacity to support appropriate densities, and their alignment with compact growth and transport-oriented development principles. Importantly, future development is not unstructured but will be coordinated through the application of site-specific Specific Local Objectives (SLOs) and the Development Plan framework. Zoning represents a strategic first step and does not, in itself, facilitate immediate development. The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. In this way, SLOs provide a structured mechanism to ensure that development is aligned with available or planned infrastructure and proceeds in a coordinated manner. Furthermore, the SLOs ensure that development proposals are subject to detailed assessment and coordination, thereby avoiding piecemeal or uncoordinated development and ensuring that infrastructure requirements, including transport demand, are clearly identified and addressed at the appropriate stage.

infrastructure rather than infrastructure that is fully delivered and operational. Strong objection is expressed to development being facilitated on the basis of the commencement of DART+ South West, rather than its completion and operational service provision. Submissions assert that linking development to construction commencement would expose future residents to prolonged periods of car dependency, congestion and service deficits, directly undermining sustainable mobility and climate objectives. The interim period between housing delivery and infrastructure operation is a recurring concern, with residents stating that "temporary" impacts often become long-term realities. In this wider context, many submissions present Finnstown Castle as a symbolic "last straw" site. Overdevelopment is framed not as a single zoning decision, but as the cumulative outcome of decades of growth across Lucan, Adamstown and, more recently, Clonburris. Residents argue that Lucan has already "done more than its share" in delivering housing to meet county and regional targets, pointing to the scale of development permitted and under construction within Adamstown and Clonburris SDZs, both of which remain substantially incomplete. Submissions assert that further rezoning at Finnstown would permanently tip the balance away	The Council has also delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. These investments demonstrate the Council's ongoing commitment to aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone (SDZ) framework represents best practice in the coordinated delivery of large-scale residential communities. These areas have been planned and phased to provide for the delivery of community facilities, transport infrastructure and open space in tandem with population growth. This approach reflects a coordinated, urban design-led model of development, promoting the efficient use of land and supporting transport-oriented development. The experience of the SDZs has informed the Council's approach to future growth, and the Planning Authority will continue to apply and reflect on the lessons learned to ensure that development is delivered in a coordinated and sustainable manner. The delivery of infrastructure such as DART+ South West, BusConnects and active travel networks provides the basis for improved sustainable mobility within the wider area. It is recognised that public transport service provision and service

from liveable community conditions by compounding congestion, service shortages and loss of amenity. Overall, submissions present overdevelopment, density and phasing as inseparable issues, contending that the combination of large-scale residential yield, inadequate infrastructure sequencing and cumulative growth pressure renders Finnstown Castle unsuitable for further development at this stage of the Development Plan cycle. *Housing and Policy* Submissions addressing housing and policy considerations are closely interlinked and are consistently framed around concerns of sequencing, proportionality and adherence to established planning principles, rather than opposition to housing delivery in principle. A significant number of submissions explicitly acknowledge the national and regional housing crisis and accept the need for additional housing supply. However, they argue that Lucan has already absorbed a disproportionately high level of housing growth relative to other parts of South Dublin County and the wider metropolitan area. Many submissions reference the scale and ongoing build-out of Adamstown and Clonburris Strategic Development Zones, noting that these two locations together are planned to accommodate many thousands of residential units. It is repeatedly	levels are a matter for the National Transport Authority (NTA) and relevant operators. The Planning Authority will continue to engage with the NTA and other stakeholders to ensure that future transport demand arising from population growth, including that facilitated by these rezonings, is planned for and responded to in a coordinated manner, aligned with national and regional transport strategies. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated district and neighbourhood transport assessments. This will inform detailed engagement with both elected members and national transport agencies on future transport options and potential projects. This study will develop a transport strategy. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. While the cumulative nature of development in the Lucan–Adamstown area is acknowledged, it is managed through ongoing coordination of land use, infrastructure planning and delivery. In

observed that a substantial proportion of these units remain unbuilt, under construction or not yet occupied, with submissions questioning the necessity of releasing additional greenfield land at Finnstown Castle before these SDZs are substantially delivered. In this context, residents argue that Lucan has already "done more than its share" in meeting housing targets and that continued rezoning further concentrates growth in an area already under pressure. From a policy perspective, numerous submissions contend that the proposed rezoning of Finnstown Castle is inconsistent with national and local planning policy, particularly the National Planning Framework's emphasis on compact growth, sequential development and infrastructure-led zoning. While Adamstown and Clonburris are acknowledged as identified growth locations with specific statutory frameworks, submissions argue that Finnstown Castle lies outside the SDZ framework and is not supported by equivalent infrastructure guarantees or delivery mechanisms. In this regard, rezoning is viewed by many submitters as diluting the intent of the SDZ process by expanding residential land supply beyond defined growth boundaries. A recurring argument across submissions is that rezoning Finnstown Castle bypasses basic planning principles by unlocking additional greenfield land	considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools, health care, and transport services by relevant agencies. As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. The Planning Authority will continue to engage with relevant agencies to align future development with the timely delivery of supporting infrastructure. Overall, the concerns raised regarding overdevelopment, infrastructure capacity and quality of life are acknowledged. However, the Planning Authority is satisfied that the proposed variation is grounded in national policy, statutory requirements and a coordinated development framework. The approach seeks to balance the need to accommodate ongoing population growth within the Dublin Metropolitan Area—supported by the availability of suitable lands—with the delivery of infrastructure, sustainable transport integration and the principles of compact, transit-oriented development, while contributing to broader national objectives of balanced regional growth.

before existing zoned land has been substantially developed or consolidated. Several submissions explicitly state that further greenfield rezoning should only occur where it can be clearly demonstrated that existing zoned lands are insufficient to meet housing need within the plan period. Submitters contend that such a demonstration has not been made for Lucan, given the quantum of residential development already permitted and underway within Adamstown and Clonburris. Some submissions also reference planning and legal principles relating to prematurity, arguing that rezoning land in advance of verified infrastructure capacity and delivery creates risk for the Development Plan and could undermine its integrity if challenged. These submissions assert that reliance on future infrastructure provision, rather than confirmed and operational services, conflicts with the plan-led system and weakens alignment between policy objectives and on-the-ground outcomes. Overall, submissions under the combined housing and policy theme argue that the rezoning of Finnstown Castle cannot be justified on housing supply grounds alone and is perceived to conflict with established planning policy on sequencing and compact growth. The prevailing position articulated is that housing delivery in Lucan should prioritise the completion and optimisation of existing SDZ lands,	**Overdevelopment, Density, Housing, Policy and Phasing** The Chief Executive acknowledges the concerns raised in submissions regarding overdevelopment, including cumulative growth pressures, infrastructure capacity, density, housing delivery and phasing within the Lucan–Adamstown–Clonburris corridor, particularly in the context of the proposed rezoning of Finnstown Castle. It is recognised that the scale and pace of development within adjoining Strategic Development Zones (SDZs) have shaped community perceptions. The delivery of plan led growth of Adamstown and Clonburris SDZs is incrementally providing a range of district and local level facilities and infrastructure. The Planning Schemes for these areas requires the phased delivery of physical and social infrastructure that will provide benefit to the wider Lucan area. The Planning Authority emphasises that the proposed rezoning must be considered within the context of national, regional and local policy obligations, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES), and the Section 28 Guidelines, all of which require planning authorities to facilitate compact growth, transport-oriented development (TOD) and the provision of sufficient, appropriately located land to meet revised housing targets. The approach adopted is therefore a policy-led response to growth, rather than an isolated or site-specific intensification. The land use approach to provide residential growth at this location supports compact growth and transport-oriented development, promoting modal shift towards public transport and active travel.

supported by infrastructure and services, before considering the release of additional greenfield or high-amenity lands such as Finnstown Castle. **Zoning** A substantial body of submissions strongly objects to the principle of rezoning Finnstown Castle from Open Space / High Amenity to Residential. Submissions repeatedly describe Finnstown Castle as one of the last remaining substantial greenfield lands in Lucan, asserting that its current zoning reflects decades of community understanding, planning intent, and its strategic role as an environmental and visual buffer between Adamstown, Lucan village and the wider road network, including the R120 corridor. A consistent position across submissions is that rezoning represents a departure from long-standing spatial planning logic and undermines confidence in Development Plan zoning objectives. Many submissions explicitly request that Finnstown Castle remain zoned as Open Space or High Amenity, with repeated proposals that the lands be formally integrated with Tandy's Lane Park to create a larger continuous public open space resource. Several submissions argue that if lands of this significance are rezoned, it sets a precedent that no remaining green space in Lucan is secure from residential development	<u>Development</u> The Planning Authority considers that the identification of Finnstown Castle is consistent with a plan-led approach to sustainable urban development, given its location between the Adamstown and Clonburris SDZs, within an established and emerging urban structure. Rather than representing uncontrolled expansion, the zoning reflects the principles of consolidation and sequential development, supporting growth contiguous to existing serviced lands and planned infrastructure utilsing TOD principles. The concentration of development in such locations is intended to avoid dispersed, car-dependent patterns of growth, instead reinforcing established frameworks, including the Adamstown SDZ, where infrastructure, services and connectivity are already in place or planned. In addition, the subject lands benefit from the proximity to fixed rail infrastructure with a permitted Dart+ project to upgrade the existing service. <u>Density</u> Concerns regarding density are acknowledged; however, it is emphasised that no specific density or typology is determined at zoning stage. Density will be established at planning application stage in accordance with the Section 28 Compact Settlement Guidelines, the Apartment Guidelines, and the County Development Plan. These frameworks ensure that higher-density development, where appropriate, is delivered to high standards of design, amenity and integration, including requirements relating to layout, dual aspect, private and communal open space, and residential quality. Density therefore remains plan-controlled and evidence-based, rather than predetermined by zoning.

Transport *Traffic and Parking* Traffic and parking concerns form one of the most detailed, consistently raised and strongly expressed themes across submissions relating to the proposed rezoning of Finnstown Castle. These issues are repeatedly framed as location-specific and cumulative, reflecting the lived experience of residents in Finnstown, Adamstown and Lucan rather than abstract modelling concerns. Submissions describe the R120 (Newcastle Road) as the primary pressure point in the local and wider road network, with congestion reported as occurring from early morning through late evening, including weekends. Many residents state that the traditional distinction between peak and off-peak periods has effectively disappeared, with traffic queues now a constant feature of daily life. Numerous submissions report 30–45 minute delays for relatively short local trips, including trips within Lucan or to nearby junctions, highlighting the extent to which the road network is perceived to be operating beyond practical capacity. Particular concern is raised regarding key junctions and access points connecting the R120 to Celbridge Road, the N4/M4 interchange, Adamstown Avenue and local estate entrances. These locations are described as unsafe, unpredictable and incapable of absorbing additional traffic. Several submissions	<u>Housing</u> The Planning Authority notes that concerns regarding overdevelopment are closely linked to housing supply and delivery. In this regard, the proposed rezoning arises from a statutory requirement to align with increased housing targets under the revised NPF and Section 28 Guidelines, which require Development Plans to demonstrate sufficient land capacity to meet projected demand. The obligation on the Council is not limited to completing existing SDZ lands, but to ensure a continuous pipeline of deliverable housing land in sustainable locations. Finnstown Castle contributes to this approach, supporting long-term housing supply in a location that can integrate with existing services and infrastructure. Furthermore, all future development will be subject to Part V requirements, ensuring the delivery of social and affordable housing, alongside Development Plan objectives requiring a mix of tenure and housing types, supporting balanced and inclusive communities. <u>Policy</u> The Planning Authority does not accept that the proposed rezoning is contrary to policy; rather, it is directly informed by national and regional planning policy, which prioritises: • Compact growth within the metropolitan footprint; • Integration of land use and transport; and • Reduction in reliance on private car use. The location of Finnstown Castle adjacent to a strategic growth area with rail infrastructure (Adamstown Station) and further planned public

recount difficulty turning out of residential estates, long waiting times to access main roads, near-miss collisions and increased driver frustration. The constrained nature of the road network is repeatedly emphasised, with residents pointing out that there are no viable alternative routes to relieve pressure on the R120 corridor. Emergency vehicle access is also cited as a growing concern, with congestion and on-street parking perceived as restricting movement at critical times. In this context, submissions argue that any additional residential development at Finnstown Castle would generate traffic that the existing network cannot safely or effectively accommodate. The potential addition of traffic from a development frequently estimated by submitters at several hundred to up to 1,000 homes is described as likely to trigger systemic network failure, rather than incremental deterioration. Many submissions therefore contend that rezoning Finnstown should not proceed until significant road capacity, junction upgrades or alternative connections are demonstrably delivered. Closely linked to traffic concerns are issues relating to parking provision and management, which are consistently described as symptoms of an already car-dependent environment. Submissions report widespread overspill parking within Adamstown estates, with cars frequently occupying footpaths, cycle lanes, grass verges and visibility splays at	transport investment (DART+ South West) aligns with these objectives and supports transport-oriented development principles. The proposal therefore represents a policy-compliant, evidence-based response to national housing and growth requirements, rather than a departure from established planning principles. <u>Phasing</u> Concerns regarding phasing and infrastructure sequencing are acknowledged and are directly addressed through the Specific Local Objective (SLO), which, in this instance, is a mechanism to ensure that development does not occur prematurely. The SLO provides a robust, enforceable framework, including: • A requirement that development may not commence until DART+ South West (or an equivalent rail service) has commenced construction or operation, ensuring alignment with strategic public transport delivery; • A requirement for a comprehensive masterplan, integrated with the Adamstown SDZ Planning Scheme, addressing cumulative impacts, infrastructure provision and connectivity; and • The preparation of supporting assessments, including a Transport and Traffic Assessment, Social Infrastructure Audit and Public Open Space Audit, ensuring that development is evidence-based and infrastructure-led. This approach is intended to ensure that future growth is properly phased, coordinated and aligned with infrastructure capacity, addressing concerns regarding sequencing and infrastructure lag. Overall, while the concerns raised regarding phasing are acknowledged, the Planning Authority is satisfied that the proposed rezoning of

junctions. These parking pressures are described as giving rise to conflicts between residents, reduced pedestrian and cyclist safety, and further constraints on emergency access. Residents argue that existing developments in Adamstown and surrounding areas were under-provided with parking, given the limited reliability and capacity of public transport options. In this context, parking stress is not viewed as a behavioural issue but as an unavoidable outcome of development in a location where car use remains a necessity for commuting, school travel and access to services. Submissions express particular concern that further residential development at Finnstown Castle would intensify parking demand not only within the new development itself but also within adjacent established neighbourhoods, further degrading residential amenity and safety. Overall, submissions present traffic, roads and parking as interconnected and location-specific constraints that have already reached a critical threshold in the Finnstown–Adamstown–Lucan area. The prevailing position articulated is that further rezoning at Finnstown Castle, without major and deliverable improvements to the road network, public transport capacity and parking management, would significantly worsen already untenable conditions and undermine the functioning of both existing and future communities.	Finnstown Castle is not indicative of uncontrolled or premature development, but rather forms part of a strategic, policy-led response to national housing requirements. The combination of compact growth principles, transport-oriented development, detailed Development Plan policies, and the provisions of the SLO—particularly the linkage to DART+ South West—ensures that development is appropriately controlled, phased and aligned with infrastructure delivery. Density and housing outcomes will be assessed on a site-specific basis at development stage, within a robust regulatory framework. Accordingly, the proposed approach seeks to manage and respond to growth pressures in a sustainable, coordinated manner, balancing the need to deliver housing with the requirement to protect infrastructure capacity, environmental quality and overall quality of life. **Zoning** The Planning Authority notes the strength and volume of submissions objecting to the principle of rezoning the Finnstown Castle lands from Open Space to Residential, including concerns regarding loss of greenfield land, perceived departure from long-standing planning intent and the role of the lands as an environmental and visual buffer between Adamstown, Lucan village and the road network. The importance of Finnstown Castle as a landscape feature and part of the wider green infrastructure network is acknowledged. In response, the Planning Authority emphasises that the proposed rezoning does not represent an ad-hoc departure from established planning principles, but forms part of a strategic assessment of housing need, land availability and infrastructure capacity undertaken as part of the Development Plan variation process. This assessment included

Public Transport and Active Travel Public transport and active travel concerns are closely interlinked and consistently raised together in submissions relating to the proposed rezoning of Finnstown Castle. Submissions frame these issues around capacity, reliability, safety and everyday lived experience within the Finnstown–Adamstown–Lucan area, and frequently present them as core constraints on the suitability of further residential development. Submissions overwhelmingly state that public transport services serving Lucan and Adamstown are already operating at or beyond capacity, with particular emphasis on peak-time conditions. Residents describe bus services frequently passing stops due to overcrowding, inconsistent or unreliable timetables—commonly referred to as "ghost buses"—and difficulty securing places on services serving Adamstown and Lucan. These conditions are described as routine rather than exceptional, reinforcing perceptions that the public transport network lacks spare capacity to absorb additional population growth. Rail services from Adamstown Station are similarly characterised as constrained, with submissions noting that trains are frequently full or approaching capacity during peak periods. Several submissions express concern that continued residential growth in proximity to Adamstown, including at Finnstown	consideration of cumulative growth patterns, remaining residential land supply, servicing ability and alignment with national and regional policy directing growth to locations that can support sustainable, compact development. While Adamstown and Clonburris SDZs continue to build out, the Council is required to ensure a sufficient and continuous pipeline of appropriately located residential land across the plan period to meet identified housing demand. In this context, the Finnstown Castle lands were identified as suitable for consideration due to their strategic location adjacent to an existing SDZ, their proximity to Adamstown Railway Station, existing and planned high-frequency bus corridors, and their potential to integrate with established urban structure rather than extending development into more remote or less accessible locations. The Planning Authority considers that, when assessed at a strategic level, the lands align with transit-oriented development principles, enabling future residents to avail of public transport, active travel infrastructure and nearby services, thereby supporting compact growth and reducing reliance on private car use over the long term. Crucially, the rezoning is explicitly constrained and qualified through the application of a robust Specific Local Objective (SLO). The SLO ensures that the lands are not treated as immediately developable and that their future development is contingent on a series of binding requirements, including the commencement of DART+ South West, the submission and agreement of an infrastructure masterplan with Uisce Éireann, and the preparation of a comprehensive infrastructure masterplan informed by cumulative development potential. This masterplan must address, inter alia, transport impacts, social infrastructure needs, public open space provision, biodiversity considerations, heritage protection and direct active travel connections

Castle, would further intensify pressure on station access, platforms and onward services, particularly when considered alongside the scale of development already permitted and under construction in Adamstown and Clonburris SDZs. A strong and recurring theme across submissions is significant dissatisfaction with BusConnects. Residents state that route reconfigurations have resulted in reduced route coverage for parts of Lucan and Adamstown, greater reliance on interchanges, and limited improvement in overall service capacity or journey reliability. In this context, submissions frequently note that buses arriving in Lucan are already full, leaving little capacity for onward passengers from Adamstown or Finnstown. The absence of a Luas line serving Lucan and the lack of a direct public transport connection to Dublin Airport are repeatedly cited as evidence of long-standing structural under-investment in public transport relative to the scale of population growth in the area. Many submissions argue that facilitating additional residential zoning at Finnstown Castle without addressing these strategic transport gaps risks reinforcing car dependency rather than supporting sustainable travel patterns. Concerns regarding phasing and reliance on future infrastructure delivery are also prominent. While submissions generally welcome DART+ South West	into Adamstown SDZ. The SLO also embeds SEA-driven mitigation measures, including the retention and enhancement of historic hedgerows, ensuring that the development responds sensitively to landscape and environmental characteristics. With regard to submissions seeking the permanent retention of the lands as open space or their integration with Tandy's Lane Park, the Chief Executive notes these views but considers that such an outcome must be balanced against statutory obligations to provide for housing delivery in sustainable locations. The Planning Authority is satisfied that the proposed zoning, when read in conjunction with the SLO and wider Development Plan framework, does not undermine the protection of green infrastructure in Lucan but instead provides for carefully phased, infrastructure-led development at a location where public transport accessibility, existing services and future connectivity can be most effectively leveraged. In summary, while the Planning Authority recognises concerns submitted regarding precedent and loss of greenfield land, it is considered that the rezoning of Finnstown Castle is justified on strategic planning grounds and not setting a precedent due to the capacity audit methodology. The combination of its location, the outcomes of infrastructure and capacity assessment, alignment with compact growth and transit-oriented development principles, and the safeguards embedded within the Specific Local Objective, ensure that the zoning represents a measured and plan-led approach rather than an erosion of Development Plan objectives or green space protection across Lucan **Transport**

in principle, strong objection is expressed to allowing development to proceed on the basis of construction commencement rather than full operational capacity. Residents argue that this would result in a prolonged interim period of congestion and unsustainable commuting patterns, compounding existing public transport deficiencies. Active travel is addressed primarily through the lens of safety and practicality, rather than opposition to walking or cycling as travel modes. Submissions describe pedestrian and cycling routes in Finnstown, Adamstown and Lucan as being compromised by traffic congestion, rat-running and parked cars, particularly along routes connecting to the R120 corridor and local distributor roads. Several submissions from parents highlight specific concerns for children walking or cycling to school, noting obstructed footpaths, unsafe crossings and traffic volumes that make independent travel increasingly risky. Notwithstanding the above, the NTA also submitted the following with regard to the site: *The NTA has noted that Finnstown Castle, Adamstown West and Tubber Lane lands identified in the variation each have an associated SLO that development may not commence until DART+ South West has commenced construction. The NTA is of the view that SDCC 'should' in the case of Finnstown*	The Chief Executive has reviewed submissions relating to transport, including traffic congestion, parking pressures, public transport capacity and active travel provision within the Finnstown–Adamstown–Lucan area. Furthermore, the below is also considered in the context of the zoning and overdevelopment responses above. These concerns are acknowledged and are considered within the context of cumulative development, existing infrastructure constraints, and future planned transport investment. National planning and transport policy, including the National Planning Framework, National Development Plan and National Sustainable Mobility Policy, establishes a clear direction towards reducing reliance on the private car and promoting more sustainable travel patterns. This is reflected in the "Avoid–Shift–Improve" framework for decarbonisation approaches, which seeks to reduce the need to travel, shift trips to public transport and active travel, and improve transport efficiency. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. For Finnstown, the SLO requires a direct active travel connection into Adamstown SDZ providing future Finnstown residents the opportunity to access the recreational amenities in Tandy Lane and Airlie Park, transport infrastructure, the Adamstown District Centre and planned

and 'may wish to' in the case of Adamstown West and Tubber Lane, review the condition (SLO) attached to the development at each site. They set out the rationale for this view on each as follows: ***Finnstown Castle (CS7 SLO3)*** *Finnstown Castle is currently directly served by the C1, L53 and P29 buses which provide a total of 14 services in the peak hour, 12 serving Dublin City Centre and 2 serving Liffey Valley Interchange. It is also very close to Adamstown Station which offers 4 rail services to the City Centre in the AM Peak Hour. Furthermore, assuming that any emerging development at this location would provide pedestrian permeability to the north, the C2 may also be considered to be within walking distance of the site, with its offer of 8 services in the peak hour. The lands of Finnstown Castle therefore benefit from a medium-high level of service using the NTA's Public Transport Accessibility Level tool (PTAL) analysis.* *The development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services.* Further to this, Irish Rail have also submitted correspondence on the delivery of DART+. Iarnród Éireann acknowledges strong population and housing growth pressures in South Dublin and notes that development at Finnstown Castle (CS7 SLO3)	Adamstown civic uses. The Finnstown site also benefits from proximity to established and future employment at Grangecastle. The Planning Authority emphasises that the proposed rezoning of Finnstown Castle is not unconstrained, but is governed by a robust Specific Local Objective (SLO) which ensures a phased and infrastructure-aligned approach, with particular emphasis on DART+ South West, BusConnects and integration with the established Adamstown SDZ transport network. <u>Traffic and Roads</u> The Chief Executive acknowledges that significant congestion exists along the R120 (Newcastle Road) and surrounding routes, with impacts on accessibility, journey times and network performance. These issues are considered within a wider strategic context, with ongoing engagement with the NTA and TII, alongside initiatives such as the Western Transport Study and the County Development Plan Roads Programme, which seek to address junction performance, capacity constraints and network efficiency. The Chief Executive is advancing a West of County Transport Strategy to address longer-term movement capacity and infrastructure requirements across the western part of the County, including the Lucan area. At a local level, the Council is actively optimising the performance of the existing road network through a range of measures. These include the operation of the Traffic Management Centre, coordinated signal control systems and the deployment of real-time traffic detection technology to dynamically manage flows. A structured programme of traffic signal upgrades and asset management is underway, alongside ongoing junction improvements, pedestrian crossing upgrades and

cannot proceed until construction of the DART+ South West project begins, alongside the requirement for a Transport and Traffic Assessment to address impacts. Across submissions, there is a widespread view that additional residential development would further undermine active travel conditions unless high-quality, segregated walking and cycling infrastructure is delivered in advance of development, rather than proposed in principle or deferred to later stages. Residents argue that experience to date shows that increased traffic volumes tend to erode, rather than enhance, active travel safety and attractiveness where infrastructure delivery lags behind development. Taken together, submissions present public transport and active travel as interdependent components of a wider mobility deficit affecting the Finnstown–Adamstown–Lucan area. The prevailing position articulated is that existing public transport services lack the capacity and resilience to absorb further growth, while active travel is increasingly compromised by congestion and parking pressures. In this context, submissions contend that rezoning Finnstown Castle for residential use would exacerbate these challenges unless strategic public transport investment and deliverable, high-quality active travel infrastructure are in place and operational prior to occupation.	traffic calming measures. These interventions are complemented by school safety and active travel programmes which reduce peak demand. The SLO also requires that any development proposal on the lands be accompanied by a Transport and Traffic Assessment, addressing cumulative impacts with Adamstown and Clonburris SDZs. <u>Parking</u> The Chief Executive notes concerns regarding parking availability and overspill. The approach to car parking in the County is directly informed by national planning policy and reflects a clear shift towards supporting sustainable transport and reducing reliance on the private car. The South Dublin County Development Plan 2022–2028 adopts maximum (not minimum) car parking standards, which are applied on a location-based, accessibility-led approach. These standards vary across the County depending on access to public transport and services. National policy, particularly the Sustainable Residential Development and Compact Settlements Guidelines (2024), reinforces this approach and introduces Specific Planning Policy Requirements (SPPRs) which planning authorities are required to apply. These guidelines provide that: • Car parking provision should be reduced at all urban locations;

Heritage Heritage impacts are a central and deeply felt concern across submissions relating to Finnstown Castle, reflecting both the architectural significance of the structure itself and the wider cultural value of its historic setting. Submissions place particular emphasis on Finnstown Castle's status as a Protected Structure (RPS Reference 112) and its long-established presence within Lucan's historical landscape. Residents consistently argue that the rezoning of adjoining lands for residential development would result in irreversible harm to the castle's setting, curtilage and historic demesne, thereby undermining the statutory purpose of protection. Finnstown Castle (formerly Finnstown Castle Hotel), located on Newcastle Road, is described in submissions as a 19th-century Edwardian-style house set within approximately 45 acres of historic grounds. The property is widely recognised as part of a surviving nineteenth-century designed demesne landscape, the character of which is integral to the significance of the Protected Structure. Submissions stress that statutory protection does not extend solely to the building itself, but also to its attendant grounds, landscaped setting, approach routes and visual context, all of which contribute to its special architectural, historical and social interest.	• In areas with good access to public transport and services, parking should be minimised, substantially reduced or, where appropriate, omitted; • Parking standards are expressed as maximum allowable levels, and proposals must justify the level of parking provided Parking provision is assessed at planning application stage, where it must be demonstrated that adequate parking is provided in accordance with the standards set out in the CDP and relevant national guidance. Where necessary, mitigation measures and parking management will be required to ensure that adjacent residential amenity, pedestrian movement and accessibility are protected. <u>Public Transport</u> The Chief Executive recognises concerns regarding the capacity and reliability of existing public transport (train and bus) but emphasises that the site is strategically located within the public transport catchment of Adamstown Station (approximately 1km away) and is served by existing and planned BusConnects routes. A key component of the transport strategy is DART+ South West, which will significantly enhance rail capacity, frequency and reliability along the Kildare line, and the comments of Irish Rail are noted. The SLO explicitly links development to the commencement of DART+ South West (or an equivalent rail service), ensuring that development is aligned with confirmed strategic transport investment. The Planning Authority has considered the NTA's position that development need not be strictly tied to DART+ South West; however, it maintains that a phased approach is appropriate, having regard to:

Several submissions reference the fact that the house, outbuildings, gate lodge and gardens are included in the National Inventory of Architectural Heritage (NIAH), with a regional rating, having regard to a range of special interests including architectural design, craftsmanship, historic landscaping and cultural associations. It is further noted that the entire property is subject to statutory protection, reinforcing the view that development on surrounding lands cannot be assessed independently of its impact on the overall demesne and historic landscape. A recurring argument across submissions is that the open grounds of Finnstown Castle form an inseparable part of the heritage asset, providing spatial relief, historic coherence and legibility of the original estate layout. Residents contend that residential development on adjoining lands would erode this relationship through increased building mass, loss of historic field patterns, fragmentation of landscaped grounds and obstruction of key sightlines and vistas to and from the castle. Several submissions specifically refer to the risk of "suburbanising" a historic demesne, thereby diluting its character and authenticity. Submissions frequently highlight the centuries-long association of Finnstown Castle with the Lucan area, arguing that its value lies not only in architectural form but also in its role as a marker of local identity	• The scale of development and cumulative demand; • Existing capacity constraints on bus and road networks; and • The need to support early behavioural shift towards public transport. • The potential behavioural change which may occur by facilitating the link • The SLO will be refined to allow flexibility where equivalent infrastructure improvements can be demonstrated, while maintaining a strong alignment between development and transport capacity. While acknowledging that the site demonstrates a medium–high public transport accessibility level using PTAL analysis, the Planning Authority considers it necessary to retain a cautious approach to sequencing, given: • The scale of development existing and proposed and resultant increased demand on the services; • The ongoing concerns around the capacity of existing services to accommodate growth; • The existing congestion on the roads impacting efficiency of bus services; and • The need to avoid a habitual pattern of travel by car which makes a behavioural change to public transport later more difficult to achieve. It is approximately 1km from the lands at Finnstown to the train station at Adamstown, this is within the distance defined in the Sustainable Residential Development and Compact Settlement Guidelines 2024 as being accessible to high-capacity transport nodes. The Dart+ SW

and continuity. The castle is described as one of the few remaining reminders of Lucan's pre-SDZ landscape, and residents argue that further residential development in its immediate surroundings would permanently diminish its cultural resonance and symbolic importance. In addition to physical impacts, submissions also raise concern regarding incremental heritage erosion, whereby the cumulative effect of development in the wider Adamstown and Lucan area has already reduced the historic and rural context of Finnstown Castle. In this light, the proposed rezoning is viewed as a critical tipping point, beyond which the historic setting of the Protected Structure would be fundamentally altered. Several submissions argue that once the surrounding lands are built upon, the historic demesne cannot be restored or meaningfully reinstated, rendering any loss irreversible. Overall, submissions present heritage as a strategic and irreplaceable consideration, not capable of being mitigated solely through design measures or buffers. The consistent position articulated is that the protection of Finnstown Castle requires the retention of its surrounding lands in a non-developed or high-amenity state, safeguarding the spatial, visual and historical integrity of the Protected Structure and its demesne for future generations. **Water/Wastewater and Flood Risk**	project has planning permission and the CPO process is advancing. In the context of the site location and the status of the strategic transport project, it is considered prudent and proportionate to retain the requirement for the alignment of this site with the commencement of construction of the DART+SW project. It is recommended to amend the SLO to provide flexibility for an equivalent rail service to the Dart+SW project be delivered. <u>Active Travel</u> Active travel is a core component of transport policy in Lucan. Active travel reduces congestion by directly removing short car trips from the network, particularly at peak times when capacity constraints are most acute. Even modest reductions in peak traffic volumes can significantly improve network performance and junction efficiency. Walking and cycling also enable more efficient use of limited road space, increase the people-carrying capacity of corridors, and support public transport by reducing demand for car-based access trips. In addition, active travel facilitates more localised trip patterns, reducing the need for longer journeys on the strategic road network. Active travel is required to achieve national climate and modal shift targets, supports compact growth patterns, and provides an effective means of accommodating increased population without reliance on road capacity expansion. The Planning Authority notes that Adamstown SDZ has already delivered a comprehensive and high-quality walking and cycling network, forming part of Cycle South Dublin and connecting residential areas to schools, open spaces, local centres and Adamstown Station.

Concerns relating to water, wastewater and flood risk are raised in a significant number of submissions and are frequently framed as cumulative infrastructure constraints within the Finnstown–Adamstown–Lucan area, informed by residents' past experience of development proceeding in advance of servicing capacity. A substantial number of submissions highlight concerns regarding wastewater infrastructure capacity, with particular reference to the Tobermaclugg Pumping Station, which is identified by residents as serving the Adamstown and Finnstown area. Submissions repeatedly state that this facility is operating close to its known or designed capacity, especially during peak rainfall or flow periods. While residents acknowledge that upgrade works have been identified or proposed in servicing strategies, they consistently argue that these works are not yet fully delivered, commissioned or operational. Drawing on previous experience in Lucan and Adamstown, submissions express concern that residential development has historically advanced ahead of wastewater upgrades, resulting in prolonged pressure on infrastructure and risk to environmental compliance. As a result, many residents contend that no further residential development should proceed at Finnstown Castle until wastewater upgrades are fully completed and demonstrably capable of accommodating existing and future demand.	Through initiatives such as Cycle South Dublin and strategic routes including the Grand Canal Greenway, the Council is delivering a coherent countywide network of safe and legible walking and cycling infrastructure, supporting everyday travel. Within Adamstown, this network is already well established and functional. The SLO requires that development at Finnstown Castle: • Provide direct active travel connections into the Adamstown SDZ network; • Integrate with existing and planned greenways and cycle routes; • Support safe, practical and attractive walking and cycling routes; and • Be designed in accordance with DMURS principles, prioritising pedestrian and cyclist safety. In addition, all future development must comply with Development Plan policies and cycle parking standards, which are to be considered alongside proximity to public transport and active travel infrastructure. <u>Summary – Transport</u> Overall, the Chief Executive acknowledges the transport pressures identified in submissions but is satisfied that they can be mitigated through a comprehensive, integrated and infrastructure-led framework. The combination of: • The Specific Local Objective (SLO) and its requirement for masterplanning and Transport and Traffic Assessment; • The strategic delivery of DART+ South West (or equivalent rail infrastructure); • The continued roll-out of BusConnects services; • The established and expanding Adamstown SDZ transport and active travel network; and

Closely linked to wastewater concerns are issues relating to surface water management and localised flood risk. While submissions generally do not dispute Strategic Flood Risk Assessment (SFRA) mapping and accept that the Finnstown Castle lands are not located within Flood Zones A or B, concern is nevertheless expressed regarding the cumulative impact of development on surface water runoff. Residents argue that the site currently comprises permeable greenfield land, which performs a natural drainage and attenuation function within the local catchment. Submissions state that replacing grassland with hard surfaces such as buildings, roads and paved areas would increase runoff rates, reduce infiltration and place additional pressure on downstream drainage infrastructure, particularly during intense rainfall events. Several submissions link surface water concerns to broader climate resilience considerations, arguing that extreme rainfall events are becoming more frequent and that the loss of permeable lands reduces the area's capacity to absorb and manage stormwater naturally. In this context, residents express concern that even where fluvial flood risk is low, surface water flooding and overloading of drainage systems could become more likely if development proceeds without robust and deliverable mitigation measures.	• Ongoing investment through Cycle South Dublin and wider transport studies, ensures that development at Finnstown Castle will be appropriately serviced. The land use approach to provide residential growth at this location supports compact growth and transport-oriented development, promotes modal shift towards public transport and active travel, and ensures that future development contributes to, rather than exacerbates, existing transport pressures. The Council will continue to engage with the NTA, TII and other stakeholders to ensure that transport infrastructure delivery keeps pace with growth and supports the development of sustainable, well-connected communities **Heritage** The Chief Executive acknowledges the concerns raised in submissions regarding potential heritage impacts associated with the proposed rezoning of lands at Finnstown Castle and, in particular, the site's designation as a Protected Structure (RPS Reference 112). The Planning Authority recognises the architectural, historical and cultural significance of Finnstown Castle (formerly Finnstown Castle Hotel), a 19th-century Edwardian-style house set within a surviving nineteenth-century designed demesne landscape of approximately 45 acres, and notes its inclusion in the National Inventory of Architectural Heritage (NIAH), with a regional rating applying to the house, outbuildings, gate lodge and gardens. It is important to clarify at the outset that the proposed rezoning of adjoining lands does not alter, weaken or remove the Record of Protected Structures designation for Finnstown Castle, nor does it diminish the statutory protection afforded to the structure, its curtilage

In summary, submissions present water, wastewater and flood risk issues as critical constraints on further development at Finnstown Castle. The prevailing view articulated is that past patterns of infrastructure lag in Lucan and Adamstown, coupled with known pressure on the Tobermaclugg Pumping Station and the loss of permeable land, mean that rezoning should not proceed unless and until water services capacity is confirmed and surface water impacts are demonstrably managed in accordance with the SFRA and best practice sustainable drainage principles. **Schools, Community and Social Facilities** Concerns relating to schools, community and social facilities are repeatedly raised across submissions and are closely linked to broader issues of cumulative growth and infrastructure capacity in the Finnstown–Adamstown–Lucan area. These concerns are consistently framed through the lens of lived experience, with residents highlighting existing service deficits and expressing scepticism that further residential development can be supported without guaranteed delivery of essential facilities. In relation to schools, submissions describe chronic pressure on both primary and secondary education provision serving Lucan and Adamstown. Residents repeatedly reference over-subscription, long waiting lists, and changes to school catchment boundaries, particularly at second-level. Several submissions	and attendant grounds. The rezoning simply identifies land use potential within the Development Plan; it does not grant permission for development, nor does it predetermine the form, scale or acceptability of any future proposal in heritage terms. The Planning Authority has specifically responded to the sensitivities identified through the incorporation of a robust Specific Local Objective (SLO) for Finnstown Castle. The SLO requires that any future planning application on the rezoned lands must be informed by appropriate studies and must explicitly address heritage considerations. In particular, the SLO requires the preparation of a Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage. This requirement directly reflects the heritage concerns raised in submissions and ensures that the relationship between new development and the historic demesne is at the forefront of the planning and design process. In addition to the SLO, all future development proposals will be assessed against the heritage and conservation objectives of the South Dublin County Development Plan 2022–2028, notably Section 12.3.7 – Protected Structures, which provides a clear and comprehensive framework for safeguarding architectural heritage: • Works that would materially affect the character of a Protected Structure require planning permission, and owners or developers may seek a Section 57 Declaration to clarify works that would not affect protected character. • All works to Protected Structures must be designed and carried out in accordance with best practice conservation principles, as set out in the Architectural Heritage Protection Guidelines for Planning Authorities (DAHG, 2011 or superseding guidance).

recount personal experiences where children were placed on waiting lists or nearly left without a local school place, causing significant anxiety for families. These experiences are cited as evidence that existing educational infrastructure is already operating beyond sustainable capacity. Submissions argue that permitting additional residential development at Finnstown Castle, without clearly identified and funded school provision, would inevitably exacerbate an already critical situation for families living in the area. A submission was received from the Department of Education and Youth with regard to the Lucan, Adamstown and Palmerstown in response to the additional zoning in the Adamstown area (including Tubber Lane). The Department indicated that the population expansion would likely generate demand for at least two additional primary schools, together with further post-primary provision, depending on demographic factors and the extent to which projected growth materialises. In this context, the Department emphasises the importance of ongoing coordination between South Dublin County Council and the Department of Education and Youth to plan for school capacity in the Lucan–Adamstown–Palmerstown area and welcomes continued engagement on this matter. Concerns extend beyond education to a broader range of community and social infrastructure, which	• Planning applications relating to works to a Protected Structure must be accompanied by a Conservation Report, prepared by a suitably qualified Conservation Architect, including a Method Statement and Schedule of Works. • For extensive or complex proposals, an Architectural Heritage Impact Assessment may also be required. • Development in proximity to a Protected Structure may require a Design Statement, specifically addressing how the proposal responds to the setting, special interest and curtilage of the structure, with explicit avoidance of pastiche design that could confuse new elements with historic fabric. The Planning Authority emphasises that development in proximity to a Protected Structure is not prohibited, but must be demonstrably sensitive, subordinate in impact and responsive to the historic landscape and architectural importance of the site. Any future planning application will therefore be subject to detailed assessment with direct input from the South Dublin County Council Conservation Architect and relevant specialist officers, ensuring that proposals do not result in detrimental impacts on the setting, sightlines, curtilage, character or special interest of Finnstown Castle. The Planning Authority further notes that many of the issues raised in submissions relate to potential outcomes of development rather than to the rezoning itself. The Development Plan and SLO framework ensures that such outcomes cannot arise without a rigorous and transparent planning assessment process, informed by statutory policy, best practice conservation guidance and expert conservation input. In summary, while the Planning Authority acknowledges the importance of Finnstown Castle and its historic demesne landscape, it is satisfied

submissions describe as insufficient relative to the scale of population growth already experienced. A recurring theme across submissions is the shortage of primary healthcare services, particularly GP access. Many residents state that GP practices in Lucan and Adamstown are closed to new patients, with long waiting times for appointments, creating significant difficulties for families, older residents and those with ongoing medical needs. The anticipated opening of new primary care facilities in Adamstown is frequently acknowledged, but submissions question whether these will be sufficient to meet existing demand, let alone additional population arising from further development. Submissions also highlight deficits in childcare provision, youth services, sports facilities, recreational amenities and leisure infrastructure. Residents note difficulties securing childcare places and describe a lack of accessible facilities for young people and families. Delays in delivering previously promised infrastructure within Adamstown—including leisure and community facilities—are frequently referenced as undermining confidence in future delivery commitments. In this context, submissions argue that further rezonings, including Finnstown Castle, risk compounding service shortfalls rather than resolving them. Healthcare access is repeatedly emphasised as a pressing concern, with submissions citing difficulties	that the proposed rezoning, when read in conjunction with the Specific Local Objective, the Development Plan's conservation policies, and the statutory protections already in place, provides a strong and enforceable framework to ensure that the Protected Structure and its setting are safeguarded. Any future development proposals will be required to demonstrate, to the satisfaction of the Planning Authority, that there is no unacceptable or detrimental impact on Finnstown Castle or its attendant heritage features **Water/Wastewater and Flood Risk** The Chief Executive acknowledges the concerns raised in submissions regarding wastewater capacity, surface water management and flood risk in relation to the proposed rezoning of Finnstown Castle. These matters have been carefully considered through the Development Plan variation process and are addressed through a combination of Strategic Flood Risk Assessment (SFRA) findings, County Development Plan policies, ongoing engagement with Uisce Éireann (Irish Water), and the application of a robust Specific Local Objective (SLO). With regard to water and wastewater infrastructure, the Planning Authority notes the concerns expressed in submissions regarding capacity constraints at the Tobermaclugg Pumping Station and the potential for development to advance ahead of servicing upgrades. In response, the Planning Authority emphasises that the proposed rezoning is explicitly subject to the requirements of the Specific Local Objective, which provides that an infrastructure masterplan must be submitted and agreed as part of any planning application for residential development on the lands. This masterplan must address water supply and wastewater network upgrades necessary to serve the subject lands, and must be agreed in advance with Uisce Éireann (Irish Water).

obtaining GP appointments, extended waiting times for allied health services, and increased pressure on emergency departments. Some submissions from healthcare professionals explicitly raise concerns about the relationship between rapid population growth, reduced access to services, and broader public health outcomes, arguing that continued development without parallel investment in community infrastructure is unsustainable. Overall, submissions present schools, healthcare and community facilities as interconnected capacity constraints that have not kept pace with development in Lucan and Adamstown. The prevailing position articulated is that any additional residential development at Finnstown Castle, in the absence of secured and timely delivery of educational, healthcare and community infrastructure, would place unacceptable pressure on services that are already overstretched, further eroding quality of life for existing and future residents. **Parks and Green Infrastructure** Parks, open space, biodiversity and green infrastructure concerns are among the most frequently and passionately articulated issues in submissions relating to Finnstown Castle. The lands are repeatedly described as a vital “green lung” for Lucan, providing environmental, recreational and health benefits that, in the view of submitters,	South Dublin County Council continues to liaise closely with Irish Water in respect of both water supply and wastewater servicing capacity, including the programming, timing and delivery of necessary upgrades. Development cannot proceed unless Irish Water confirms that adequate and sustainable servicing arrangements are available, ensuring that proposals do not place undue pressure on existing networks or compromise compliance with environmental standards. In relation to flood risk and surface water, the Planning Authority draws attention to the findings of the Strategic Flood Risk Assessment for Finnstown Castle. The SFRA confirms that the lands comprise open grassland and scrub, situated east of Tandy’s Lane Park and west of Newcastle Road, and that no open watercourses are present within the site boundaries. The SFRA further establishes that the lands are not located within Flood Zones A or B, nor within the HEFS 0.1% or 1% Annual Exceedance Probability (AEP) zones. On this basis, no Justification Test is required, and the SFRA concludes that the proposed land-use zoning is appropriate from a flood risk perspective. The SFRA states that flood risk for any future development must be assessed in accordance with Section 4.3 of the SFRA. Accordingly, any planning application will be required to submit a site-specific Flood Risk Assessment, informed by the most up-to-date Office of Public Works (OPW) flood maps, to demonstrate that both fluvial and surface water risks are adequately addressed. In addition, all development proposals will be assessed against the relevant South Dublin County Development Plan policies and objectives relating to flood risk management, climate resilience and surface water drainage. The Planning Authority will require the incorporation of Sustainable Urban Drainage Systems (SuDS) in accordance with the

cannot be replicated elsewhere in the area given the scale of surrounding development. A large number of submissions emphasise that Finnstown Castle represents one of the last remaining substantial areas of undeveloped, semi-natural landscape within the Lucan–Adamstown corridor. Residents describe the lands as offering visual relief, openness and a sense of connection to Lucan's historic rural setting, acting as a counterbalance to the intensification of development associated with the Adamstown and, prospectively, Clonburris SDZs. Submissions frequently argue that, as density increases in the surrounding area, the importance of remaining green space becomes exponentially greater, rather than redundant. The role of Finnstown Castle during the Covid-19 pandemic is repeatedly cited as illustrative of its wider value. Submissions describe the lands as having provided informal refuge, mental respite and a sense of wellbeing during periods of restricted movement, with residents arguing that this experience underscored the importance of accessible and visible natural landscapes in built-up areas. In this context, Finnstown Castle is seen not merely as undeveloped land, but as an essential component of community resilience and public health. Many submissions provide detailed descriptions of the site's ecological features, drawing directly on observed conditions and, in some cases, referencing	SDCC SuDS Guidance, to ensure that surface water runoff rates and volumes are managed appropriately and that greenfield runoff rates are maintained as far as practicable. In summary, while the Planning Authority recognises the concerns expressed in submissions regarding wastewater capacity and surface water impacts, it is satisfied that these matters are comprehensively addressed through the Specific Local Objective, the findings of the SFRA, ongoing liaison with Uisce Éireann, and the application of Development Plan policies and SuDS-led design principles. The combined effect of these measures ensures that any future development at Finnstown Castle can only proceed where water services capacity is confirmed and flood risk and surface water impacts are demonstrably managed in accordance with best practice and statutory guidance. **Schools, Community and Social Facilities** The Chief Executive acknowledges the concerns raised in submissions regarding pressure on schools, healthcare provision and wider community and social facilities in the Finnstown–Adamstown–Lucan area. These matters are recognised as fundamental to the creation of sustainable communities and have been carefully considered in the assessment of the proposed rezoning of Finnstown Castle. In relation to schools, the Planning Authority wishes to clarify that school place planning is undertaken on an ongoing basis through regular liaison between South Dublin County Council and the Department of Education and Youth, informed by population forecasts, zoned land availability and the delivery trajectory of major development areas.

the Council's own environmental assessments. Specific features repeatedly mentioned include: • Historic hedgerows, including long-established field boundaries; • Mature trees and parkland planting, contributing to landscape character and ecological stability; • Ponds and wet features, identified as biodiversity assets; and • Grassland areas, including references to botanically important calcareous grassland. These features are described as supporting a wide range of wildlife, with submissions noting the presence of birds, bats, mammals and invertebrates, and emphasising the value of the lands as everyday habitat rather than isolated ecological fragments. A strong recurring theme is the role of Finnstown Castle as a wildlife corridor within an increasingly urbanised landscape. Submissions argue that the site functions as a connective link between smaller green spaces, residential areas and the wider Liffey Valley environment, facilitating the movement of mobile species and maintaining ecological connectivity. Against this backdrop, development is viewed as likely to result in irreversible habitat fragmentation, with residents expressing scepticism that replacement planting or on-site mitigation could adequately replicate the function of long-established ecological systems.	Two additional school sites—at Tandy's Lane (a primary school with special educational needs provision) and Aderrig (a flexible primary or post-primary facility)—have already secured planning permission and are actively being progressed by the Department of Education and Youth. Both include provision for interim accommodation, such as modular classrooms, to ensure timely delivery of school capacity in line with residential occupation. As such, these are committed elements of a statutory framework rather than aspirational proposals. While broader pressures on school enrolment and community facilities in the Lucan area are acknowledged, the Planning Authority considers that Finnstown Specific Local Objective (SLO) be amended to include an approach to secure the additional school requires for the area, as stated by the DOEY. A more specific amendment to the SLO is recommended to reinforce that schools are delivered in an appropriate manner for the area. In response to engagement with the Department of Education and Youth, it is recommended that the SLO be amended to explicitly provide for additional educational capacity to serve Finnstown Castle and adjoining growth areas (including Tubber Lane North and Adamstown SDZ West). Ongoing collaboration between South Dublin County Council and the Department will allow further refinement of school provision as part of masterplanning and future planning processes. **CE Recommendation** Amend wording of the SLO no. CS7 SLO3 to reflect requirement to ensure adequate future capacity within the wider vicinity in respect of school delivery, and continuing to liaise with the DOEY:

Several submissions explicitly warn against the cumulative loss of green infrastructure in Lucan, noting that each rezoning and development incrementally reduces the area's environmental buffering capacity. Finnstown Castle is frequently described as a critical threshold site, with the argument that once these lands are developed, there will be no remaining opportunity to preserve continuous green infrastructure in this part of Lucan. In summary, submissions present parks and green infrastructure at Finnstown Castle as a strategic, irreplaceable asset with significance far beyond the site boundary. The prevailing position articulated is that Finnstown Castle performs essential functions for biodiversity, landscape character, climate resilience and community wellbeing, and that its development would result in a permanent net loss of green infrastructure that cannot be mitigated through design measures alone. **Miscellaneous – Employment, Retail, Tourism, Climate Action and Environment, and Utilities** <u>Employment, Retail and Tourism</u> Employment and retail do not arise as standalone or substantive planning policy issues in submissions relating to Finnstown Castle. Where they are referenced, it is generally in a contextual or incidental manner, often linked to commuting patterns rather than local employment provision.	***g. ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.*** Beyond schools, the Planning Authority notes that Adamstown SDZ has been planned and delivered with a broad range of community and social infrastructure. This includes a Primary Care Centre, a district centre with retail and service uses, larger shopping facilities, cafés, a veterinary practice, and a library and enterprise/community centre with planning permission. Adamstown is also well connected to Dublin City Centre by rail, providing access to a wide range of higher-order services, employment and amenities. Both Adamstown and Clonburris SDZs include, or will include, dedicated community centres to serve the local population as development progresses. The Council has recently improved community and social infrastructure in the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House and the continued development of Griffeen Park. In this regard, the zoning of lands at Adamstown West will contribute to the ongoing review and refinement of social infrastructure planning by the Council, including engagement with key stakeholders such as the Department of Education, the Health Service Executive and the National Transport Authority to identify and address emerging demands. The proposed rezoning of Finnstown Castle is further subject to a robust Specific Local Objective (SLO), which directly responds to concerns around social and community capacity. The SLO requires that any planning application for residential development on the lands be

Submissions do not propose alternative employment zoning for the site, nor do they advocate for retail-led development as an alternative to residential use. Tourism, however, is raised more meaningfully, primarily in terms of perceived lost opportunity. Several submissions refer to Finnstown Castle's former role as a hotel, hospitality and cultural venue, noting that it historically functioned as a destination for events, leisure and community gatherings. In this context, residents argue that rezoning the surrounding lands for residential development would foreclose future opportunities for heritage-based, recreational or tourism-related uses connected to the castle and its demesne. It is contended that once the historic grounds are developed, the potential to re-establish or revitalise Finnstown Castle as a cultural or visitor asset linked to its setting would be permanently diminished. <u>Climate Action and Environment</u> Climate action concerns are raised consistently across submissions and are closely tied to land-use patterns, transport dependency and the loss of greenfield lands. Residents argue that rezoning Finnstown Castle for residential development, in a context where public transport is not yet fully operational at high capacity, would increase private car dependency, leading to higher vehicle emissions and undermining national and local climate targets.	informed by a Social Infrastructure Audit, identifying existing capacity and any additional needs arising from the proposal, with provision made within the development to address those needs where appropriate. This requirement ensures that social infrastructure considerations are addressed at the earliest stage and in the context of cumulative development potential, rather than being deferred. The Planning Authority acknowledges that schools, healthcare and community facilities are under pressure in parts of Lucan, it considers that the planned and ongoing delivery of educational and social infrastructure within Adamstown and Clonburris SDZs, combined with ongoing engagement with the Department of Education and Youth, the integration requirements of the Specific Local Objective, and access to higher-order services within Adamstown and Dublin City, provide a robust framework to support future population growth. The Planning Authority is satisfied that these mechanisms ensure that development at Finnstown Castle, if and when it occurs, can be integrated into a wider network of schools, healthcare and community facilities serving the area. **Parks and Green Infrastructure** The Chief Executive acknowledges the strong emphasis placed in submissions on parks, biodiversity and green infrastructure, and recognises the value attached to Finnstown Castle as an area of openness, landscape quality and environmental amenity. These considerations have been integral to the assessment of the proposed rezoning and have directly informed the structure of the Specific Local Objective (SLO) and the wider Development Plan framework that applies to the lands.

The loss of open greenfield land is also repeatedly linked to wider climate impacts. Submissions argue that Finnstown Castle currently functions as a carbon sink and urban cooling space, and that development would reduce carbon sequestration capacity, increase hard surfaces and exacerbate heat and runoff effects. These impacts are framed not only as local environmental concerns but as contributing to diminished climate resilience in an area already experiencing pressure from urbanisation. Broader environmental concerns raised include declining air quality, traffic-related noise and the cumulative erosion of landscape character across Lucan. Several submissions argue that each successive rezoning and development has incrementally reduced environmental quality, and that Finnstown Castle represents one of the last mitigating green spaces buffering residential areas from traffic corridors such as the R120. A submission was also received from the DHLGH NPWS with regard heritage-related (mostly environmental) observations/recommendations. In summary these were that the proposed Variation involves the rezoning of approximately 156 hectares of land for residential development, including areas currently designated as Rural, Open Space, and High Amenity. This raises an overarching concern regarding the likely reduction in biodiversity across multiple sites, with potential impacts on species	From a strategic perspective, the Planning Authority notes that Finnstown Castle is located within a wider planned green infrastructure network serving Adamstown, Clonburris and Lucan. Two of the four strategic parks identified in the Adamstown SDZ Planning Scheme have been completed, with a third under construction and the fourth planned for future delivery, ensuring that a critical mass of high-quality publicly accessible open space is available to residents. This is in addition to the extensive network planned in Clonburris, notably, the presence of significant strategic green assets in the wider area, including Griffeen Valley Park and the Grand Canal Greenway, both of which offer large-scale recreational, ecological and active travel functions and are accessible from Adamstown and Lucan. These assets form part of the broader green infrastructure spine serving South Dublin and contribute significantly to recreational choice, biodiversity and climate resilience at a metropolitan scale. At site level, concerns about biodiversity and landscape features at Finnstown Castle are explicitly addressed through the Specific Local Objective (CS7 SLO3). In particular, the SLO requires the retention and enhancement of the hedgerow and tree line on the north-western boundary of the site, as recorded on 1st Edition Ordnance Survey maps, ensuring that historic landscape features and ecological connectivity are protected at plan level. The SLO further requires a Public Open Space Audit and a Green Infrastructure-led masterplanning approach, ensuring that open space provision, ecological features and connections to surrounding green networks are integral to development proposals rather than residual elements. Any proposed development will be required to provide public open space in accordance with the Development Plan standards.

such as badgers, bats, otters, amphibians, birds, and protected plant species. Key risks identified include habitat loss, disturbance from inappropriate lighting (particularly affecting bats), and encroachment into sensitive ecological corridors. To address these issues, it is recommended that biodiversity protection be fully integrated into all development proposals, that lighting in sensitive areas be designed to be bat-friendly, motion-activated, and avoid spill into natural habitats, and that strong ecological buffers—especially near protected areas—be maintained or enhanced. Furthermore, all development should be guided by comprehensive ecological assessments to ensure informed and sustainable outcomes. In addition, Inland Fisheries Ireland highlights concerns regarding the potential impact of the proposed Variation on water quality, flood risk and aquatic ecosystems, noting that the SEA does not fully address the requirements of the EU Nature Restoration Regulation. The submission emphasises the need to protect surface and groundwater under the Water Framework Directive and warns that insufficient maintenance of SuDS infrastructure could increase flood risk and degrade water quality. IFI also raises concerns about wastewater network capacity, including existing pressure on the foul conveyance system and increased instances of CSO discharges, and advises that significant investment in water and wastewater infrastructure will be required	The Planning Authority also highlights the application of the Green Space Factor (GSF), as set out in the County Development Plan. The GSF is a score-based requirement that establishes minimum standards for landscaping and green infrastructure provision in new development. All qualifying developments are required to achieve a minimum GSF score based on the land-use zoning of the site. Where a site is considered to be of particular sensitivity or value from a green infrastructure perspective, including sites located within or adjacent to primary or secondary green infrastructure corridors, the Development Plan requires early engagement with the Planning Authority to identify appropriate site-specific interventions. In such cases, proposals must demonstrate that development does not fracture the existing green infrastructure network and that ecological connectivity is preserved or enhanced. The Finnstown Castle lands will be subject to this approach, reflecting their environmental and landscape sensitivities. The Planning Authority further notes Development Plan Objective 10.2.10 – Green Infrastructure and Energy, which recognises that green infrastructure plays an important role in offsetting greenhouse gas emissions from development and transport activity, acting as a carbon sink and contributing to climate resilience. Accordingly, any reduction in green areas or trees must be carefully considered, with strong emphasis placed on retention, enhancement and compensatory planting where appropriate. In summary, while the Planning Authority recognises the value that residents place on Finnstown Castle as part of Lucan's green infrastructure, it is satisfied that the proposed rezoning, when read in conjunction with the Specific Local Objective, the extensive existing

to support future development without adversely affecting the aquatic environment. Utilities Utility capacity issues are raised by a number of submissions as part of the wider infrastructure context. Residents reference pressure on electricity supply, digital connectivity and drainage infrastructure, framing these issues as cumulative impacts of sustained population growth across Lucan, Adamstown and surrounding areas. Submissions argue that upgrades to utilities have historically lagged behind residential development, resulting in reliability issues and service strain. In this context, further residential rezoning at Finnstown Castle is viewed as likely to compound existing utility pressures unless upgrades are demonstrably delivered in advance of development. **Aviation Safeguarding** A submission was received from TPA consultants on behalf of Weston Airport. Support was indicated for the overall intent of Proposed Variation No. 2, and South Dublin's approach to aligning the Development Plan with the National Planning Framework (NPF) Housing Growth Requirements (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024).	and planned park provision in Adamstown and Clonburris SDZs, strategic assets such as Griffeen Valley Park and the Grand Canal, and the application of the Green Space Factor and green infrastructure policies of the County Development Plan, provides a robust and enforceable framework to ensure that green infrastructure, biodiversity and landscape quality are protected, enhanced and integrated as part of any future development. **Miscellaneous – Employment, Retail, Tourism, Climate Action and Environment and Utilities** Employment, Retail and Tourism The Chief Executive notes submissions referencing Finnstown Castle's former role as a hotel and hospitality venue and the view that residential zoning could foreclose future tourism or employment-generating uses. In this regard, it is important to clarify that the proposed rezoning does not remove or preclude hotel or hospitality use of the existing Protected Structure, which remains subject to the normal provisions of the Planning and Development Act, including permitted development exemptions, change-of-use provisions, or future planning applications at the discretion of the owner/operator. More broadly, employment generation within the area is not solely dependent on this individual site. The Planning Authority highlights that Adamstown SDZ and Clonburris SDZ are planned as mixed and balanced communities incorporating employment, retail, enterprise and service uses alongside residential development. Adamstown includes an approved enterprise and innovation centre, alongside a district centre with retail, services, cafés and other commercial uses, fostering local employment opportunities and reducing the need for

The primary purpose of the submission is to safeguard the current and future operational, safety and technical requirements of Weston Airport, in accordance with Section 11.8.3 of the South Dublin County Development Plan 2022–2028. The submission notes that a number of land parcels proposed for rezoning and requests that any future planning applications on these lands be carefully assessed to ensure there are no adverse impacts on the operational integrity of Weston Airport, aviation safety requirements, and associated specialist aviation activities, including the Irish Coast Guard Search and Rescue helicopter operations based at the airport. It is highlighted that Weston Airport, in consultation with the Irish Aviation Authority (IAA), is currently implementing RNAV (Area Navigation) approach procedures for Runway 07/25. These procedures will be used by the Coast Guard Search and Rescue service and are identified as particularly sensitive to inappropriate development that could interfere with flight paths, safety surfaces, or navigational requirements. Overall, while supporting the strategic aim of increased housing delivery, the submission emphasises the importance of ensuring that future development near Weston Airport is managed in a manner that avoids conflict with aviation operations, through careful planning assessment and adherence	long-distance commuting. Clonburris SDZ similarly incorporates employment-supporting uses within its planning framework. In tourism terms, South Dublin County Council has an adopted Tourism Strategy, which promotes and supports a number of strategic tourism clusters. Of particular relevance to Finnstown Castle is the Grand Canal Corridor, which the Development Plan identifies as a key recreational and tourism asset. The recent completion of sections of the Grand Canal Greenway, coupled with the emerging 12th Lock Masterplan, significantly strengthens the area's tourism and recreational offer. These initiatives support cycling, walking and heritage-based tourism and are not undermined by residential development that is integrated within a compact, well-planned settlement structure. In addition, the site is proximate to established and future employment at Grangecastle Business Park. <u>Climate Action and Environment</u> The Chief Executive acknowledges submissions expressing concern that further development could increase car dependency, emissions and environmental pressures. These concerns are fully recognised within the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) and the County Development Plan, all of which seek to move away from historic "business-as-usual" patterns of dispersed, car-dependent development. The proposed rezoning of Finnstown Castle has been assessed within this policy context and is explicitly linked through the Specific Local Objective to transport-oriented development (TOD). The SLO ensures that development is aligned with the delivery of DART+ South West, high-frequency bus services under BusConnects, and the established

to existing airport-related policy provisions in the Development Plan. **Environmental Evaluation** Environmental assessment issues, particularly those relating to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), are raised by a notable number of submissions and are frequently presented as evidence-based objections grounded in the Council's own environmental findings for Finnstown Castle. These submissions go beyond general environmental concern and instead directly reference the outcomes and implications of the statutory assessment processes underpinning the proposed zoning variation. A number of submissions explicitly refer to the Strategic Environmental Assessment prepared for the Development Plan variation, noting that the Finnstown Castle lands are identified as having significant ecological and environmental value. Residents cite the SEA's recognition of important habitats and features present on the lands, including botanically important calcareous grassland, ponds, mature scattered trees, treelines, and hedgerows. Particular emphasis is placed on the fact that these features are not incidental or recently formed, but represent long-established elements of the historic demesne landscape associated with Finnstown Castle. In this context, submissions argue that rezoning land identified through the SEA as	cycling and walking network within Adamstown SDZ and beyond. This framework supports a modal shift away from private car use, which is central to national and local climate objectives. Environmental considerations are further embedded through Development Plan policies relating to: • Green Infrastructure and Energy objectives, which recognises the role of green infrastructure as a carbon sink and as a means of offsetting greenhouse gas emissions; • Protection and enhancement of landscape character; and • Integration of climate resilience, including SuDS and urban cooling measures, into development design. With regard to the comments from the DHLGH NPWS and Inland Fisheries, these issues will be dealt with through preliminary assessments undertaken to inform a masterplan and layout prior to the site being assessed for future development. Furthermore a robust SEA and AA was undertaken as part of the variation process and reviewed in respect of comments received for the sites outlined in the variation. The Chief Executive considers that compact growth in accessible locations, rather than continued outward expansion into less connected areas, represents the most effective long-term environmental response. <u>Utilities</u> The Chief Executive acknowledges concerns raised regarding electricity, communications and drainage capacity. In this regard, the Planning Authority confirms that it liaises on an ongoing, site-specific basis with infrastructure providers, including ESB Networks, telecommunications providers and Uisce Éireann, as part of both plan-making and development management processes.

environmentally sensitive appears contradictory unless accompanied by strong, enforceable mitigation measures. Several submissions go further by referencing specific habitat types identified in the SEA, including ponds, mature parkland trees, treelines and hedgerows, noting that these features support ecological diversity and provide stepping-stone habitats within an increasingly urbanised environment. The presence of protected and notable bird species, such as swallows and mute swans, is also referenced by some submitters, who argue that the cumulative loss or fragmentation of these habitats would result in irreversible ecological degradation. On this basis, residents contend that the SEA findings strengthen, rather than weaken, the case for retaining the lands in a non-developed or high-amenity state. While Appropriate Assessment (AA) is less frequently referenced by name, many submissions raise concerns that clearly align with AA considerations. These include potential impacts on mobile species, ecological corridors, and connectivity toward the Liffey Valley, which is recognised as a sensitive ecological and landscape resource at a wider scale. Submissions repeatedly describe Finnstown Castle as functioning as a green link or buffer between developed areas and larger semi-natural landscapes, and argue that development would disrupt	A submission was received from the Electricity Supply Board (ESB) with regard the overall variation, having no site specific objections to the proposed variation. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals Further to this, a submission was also received from UE regarding Finnstown Castle – Ref. No.3 Finnstown Castle - *Water Network: Local upgrades may be required.* *Sewer Network: Upgrades likely. Impacts on Downstream pumping station would need to be modelled* As well as the following in relation to Tobermaclugg pumping: *The pumping station is not currently operating at capacity. In addition, upgrades are being advanced to maintain headroom. It is estimated that these should be completed within the lifetime of the CDP* The following was also received with regard capacity issues: *Capacity in UE assets changes regularly and is only valid at the point in time that it is assessed. This confirmation occurs at Connection Application stage, submitted by the developer.* The Specific Local Objective provides a clear safeguard by requiring an infrastructure masterplan, agreed in advance with Irish Water/UE, addressing both water and wastewater capacity before development may proceed. Wider utility infrastructure is addressed at application stage through consultation with relevant providers to ensure that physical infrastructure is available, deliverable and capable of

movement patterns of species and reduce ecological connectivity, particularly for birds and bats. Several submissions express concern that the cumulative impacts of development, when considered alongside Adamstown, Clonburris and other Lucan rezonings, may not be fully captured through site-specific assessment alone. In this regard, residents argue that SEA and AA must be understood as strategic tools, intended to inform whether particular lands should be rezoned at all, rather than relying solely on mitigation at application stage. The risk of incremental habitat loss and fragmentation is highlighted as a key concern, with submissions warning that once ecologically valuable greenfield lands are developed, mitigation cannot fully replicate their original function or biodiversity value. A recurring theme across SEA- and AA-related submissions is the view that environmental mitigation must be secured at plan level, rather than deferred. Residents express scepticism that mitigation proposed at development stage will adequately compensate for the loss of established habitats and landscape features identified through the SEA. In particular, hedgerows, mature trees and ponds are regarded as features that require long-term protection and enhancement rather than relocation or replacement.	supporting development, in line with Development Plan objectives. Further engagement with other key stakeholders will occur as the masterplan develops. **Aviation Safeguarding** A submission made on behalf of Weston Airport has been carefully considered, with particular regard to the safeguarding of aviation operations, public safety, and the operational and technical requirements of civil aerodromes within and adjoining South Dublin County. The Council supports aviation safeguarding as set out within Chapter 11.8 of the South Dublin County Development Plan 2022–2028, which provides a comprehensive framework for development controls in the vicinity of Dublin Airport, Casement Aerodrome and Weston Airport, having regard to international, European and national aviation standards. These include the safeguarding requirements established under ICAO Annex 14, the Irish Aviation Authority (IAA) Guidance on Aerodrome Safeguarding, and the EASA Certification Specifications for Aerodromes. The Planning Authority recognises the role of Weston Airport as a key aviation facility, including its use for pilot training and Irish Coast Guard Search and Rescue operations, and notes ongoing developments such as RNAV approach procedures. The Council reaffirms its commitment to Policy IE10 and associated Development Plan objectives, which ensure that development in the vicinity of the airport is appropriately managed. In addition, the continued application of Public Safety Zones (PSZs) under Policy IE14 is emphasised, restricting development in areas close to runway thresholds in the interests of public safety. Overall, the Planning Authority is satisfied that the existing Development Plan

Overall, submissions relating to SEA and AA present Finnstown Castle as an area where environmental assessment findings strongly inform the appropriateness of rezoning. The prevailing concern articulated is that the Council's own SEA identifies significant ecological value on the lands, and that rezoning for residential development risks undermining the objectives of strategic environmental and habitat protection unless mitigation is demonstrably robust, enforceable and capable of addressing both site-specific and cumulative impacts, including effects on ecological connectivity toward the Liffey Valley.	framework provides adequate safeguards to protect airport operations and residential amenity, and supports the continued safeguarding of Weston Airport's function. **Environmental Evaluation** The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Finnstown Castle. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. Following a review of same, the following was concluded: *" Based on aerial imagery, these lands display 2 open grassland fields (GA2) with scattered clusters of trees (WD5) and hedgerows (WL1) and tree lines (WL2), an area in the west comprises built land and artificial surfaces (BL3). No records of protected species were returned from NBDC."*

	It is important to note that there are a number of related projects, such as, BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process. Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and

	comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The subject lands at Finnstown meet these objectives. Finnstown represents a strategically located site where existing and planned transport connectivity, service capacity and compact growth principles support sustainable development. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation Amend wording of the SLO no. CS7 SLO3: Development on RES zoned lands at Finnstown Castle shall comply with the following: 1. Development may not commence until DART+ South West **or an equivalent rail service** has commenced construction **or operation, as may be relevant**.	

2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.
3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia:
a. Retention and enhancement of the hedgerow and tree line on the north-western boundary of the site as recorded on 1st Edition OS maps,
b. A Social Infrastructure Audit and provision within development proposals to address any needs identified,
c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact,
d. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage,
e. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and
f. Provision for direct active travel connections from the subject lands into Adamstown SDZ.
g. Demonstrate that adequate educational capacity for residential growth adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.

AMENDMENT NO. 4 - TUBBER LANE NORTH

Existing

Proposed

Submission No.

SD-C401-CDP25-11 – Jayaprakash Bhagyasree Bhagyasree

SD-C401-CDP25-21 – David McCormack

SD-C401-CDP25-28 – Irena Stoicka

SD-C401-CDP25-71 – Emmet Rafferty

SD-C401-CDP25-89 – Francisca Moules Darcy

SD-C401-CDP25-153 – Isabel Arboleda

SD-C401-CDP25-160 – Rory Thynne

SD-C401-CDP25-171 – John O'Shea

SD-C401-CDP25-273 – Patrick Bradshaw

SD-C401-CDP25-274 – Renata Futo

SD-C401-CDP25-282 – John Kelly

SD-C401-CDP25-285 – Trisha Duffy-Barber

SD-C401-CDP25-313 – Jennifer Harte	SD-C401-CDP25-318 – Fearghal Lawlor	SD-C401-CDP25-330 – Sarah McDermott
SD-C401-CDP25-337 – Kieron Byrne	SD-C401-CDP25-356 – Susan Kavanagh	SD-C401-CDP25-386 – Justyna Zajakala
SD-C401-CDP25-388 – Robert Maloney	SD-C401-CDP25-405 – David Mescall	SD-C401-CDP25-406 – Joe Whyte
SD-C401-CDP25-413 – Vivek Soni	SD-C401-CDP25-414 – niall oneill	SD-C401-CDP25-418 – Michael Delany
SD-C401-CDP25-429 – Stuart Campbell	SD-C401-CDP25-431 – Lorna Quinn	SD-C401-CDP25-434 – Katarzyna Czarzasta
SD-C401-CDP25-448 – Seun Ogunkunle	SD-C401-CDP25-460 – Evans Kipchaui	SD-C401-CDP25-462 – Ciara Dardis
SD-C401-CDP25-480 – Joy Hearn	SD-C401-CDP25-506 – Neal Murphy	SD-C401-CDP25-534 – Julie Keane
SD-C401-CDP25-541 – Owen McCabe	SD-C401-CDP25-558 – Kevin Fitzgerald	SD-C401-CDP25-601 – Hayley McLoughlin
SD-C401-CDP25-702 – Eileen Dennehy	SD-C401-CDP25-711 – Catherine O' Donnell	SD-C401-CDP25-713 – John O'Donnell
SD-C401-CDP25-776 – Mary Whittle	SD-C401-CDP25-777 – Little Folk Preschool	SD-C401-CDP25-783 – Sarah Owen
SD-C401-CDP25-825 – Jennifer Merriman	SD-C401-CDP25-838 – Ray Barnes	SD-C401-CDP25-841 – David Kilgannon

SD-C401-CDP25-847 – Grace Lavery O'Reilly	SD-C401-CDP25-852 – Danielle Devesey	SD-C401-CDP25-855 – Vincent Casserly
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-887 – Nina Healy	SD-C401-CDP25-1038 – Colin Mulligan
SD-C401-CDP25-1039 – Úna Mulligan	SD-C401-CDP25-1042 – Matt Lavery-O'Reilly	SD-C401-CDP25-1077 – AIMEE AHERN
SD-C401-CDP25-1091 – claire Levingstone	SD-C401-CDP25-1118 – Anita Cahill	SD-C401-CDP25-1137 – Mairead Mckee
SD-C401-CDP25-1151 – Louise Brogan	SD-C401-CDP25-1156 – Doyle Kent Planning Partnership Ltd	SD-C401-CDP25-1159 – David Whittle
SD-C401-CDP25-1160 – Ashleigh D'Arcy	SD-C401-CDP25-1167 – Inland Fisheries Ireland	SD-C401-CDP25-1174 – Aine Maguire
SD-C401-CDP25-1193 – Priya Parameswaran	SD-C401-CDP25-1233 – Sarah Casey	SD-C401-CDP25-1239 – Cllr. Helen Farrell
SD-C401-CDP25-1260 – David Kinsella	SD-C401-CDP25-1270 – Marcel Notenboom	SD-C401-CDP25-1271 – Karen Kinsella
SD-C401-CDP25-1315 – E.M Hurley	SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1365 – Hermitage Park
SD-C401-CDP25-1373 – Dympna Donohoe	SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1381 – Mark O'Dwyer

SD-C401-CDP25-1389 – Sheelagh O'Dwyer	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1442 – Paul Gogarty TD
SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1450 – Edina Almasi	SD-C401-CDP25-1512 – Julie McMullan
SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1523 – Kevin Farrell	SD-C401-CDP25-1525 – Gary Connolly
SD-C401-CDP25-1532 – John Gobbett	SD-C401-CDP25-1544 – Eddy Byrne	SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail
SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1597 – Cllr Vicki Casserly	SD-C401-CDP25-1643 – Tara Ryan
SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1705 – Kirill Priadko
SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1727 – Ajai Govind Govindan
SD-C401-CDP25-1760 – Laura Doyle		

Summary	CE Response
Overview A large volume of submissions were received in respect of the proposed rezoning and Specific Local Objective (SLO) for lands at Tubber Lane North (Amendment 4). Many submissions were identical or near-identical in content, including a petition-style submission signed by multiple residents of the	This amendment is in relation to the designation of lands at the Tubber Lane North, that are currently zoned Objective RU to a RES-N and OS zonings under Variation No. 2 of the South Dublin County Development Plan 2022-2028. The site is located directly north of Adamstown SDZ, adjoining its northern boundary, and to the east of the Celbridge Link Road.

Hallwell area, and a large number of standardised individual submissions. The submissions are therefore summarised thematically below for ease of reference and response. The submissions predominantly object to the proposed zoning and associated SLO on grounds relating to infrastructure capacity, traffic and transport, overdevelopment, environmental sensitivity, flood risk, and the timing of development relative to critical infrastructure delivery, particularly in response to the delivery of DART+ Southwest and Tobermaclugg Park (as per the phasing requirements of the Adamstown Strategic Development Zone (SDZ) Planning Scheme, as amended). A significant number of submissions contend that the wider Lucan area, including Adamstown have already accommodated disproportionate levels of residential development, including through the ongoing delivery of the Adamstown and Clonburris SDZs. It is argued in the submissions received with regard to amendment 4 that the proposed additional residential capacity at Tubber Lane North would constitute a further exacerbation of the issues outlined above, and below, and further impact residential amenity. A submission opposes the proposed Variation on the basis that it lacks an integrated, strategic approach, arguing that insufficient consideration has been given	The rezoning includes an associated SLO, CS7 SLO5, it states the following: *Development on RES-N zoned lands north of Tubber Lane shall comply with the following:* *1. Development may not commence until Dart+ Southwest has commenced construction.* *2. Development may not commence until Tobermaclugg Park, a phasing requirement of the Adamstown SDZ Planning Scheme, has commenced construction.* *3. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.* *4. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia:* *a. Retention and enhancement of the north-south hedgerow as recorded on 1st Edition OS maps, unless required for wider movement needs,* *b. Ensure compliance with G13 (Riparian Corridors) in relation to any watercourses on site,* *c. A Social Infrastructure Audit and provision within development proposals to address any needs identified,*

to the broader environmental and infrastructural implications of the proposals. It calls for a more comprehensive plan, based on a systems-thinking approach, that would better balance housing delivery with environmental protection and long-term sustainability. **Overdevelopment – Lucan Wide Cumulative Impact** Overdevelopment and disproportionate levels of development have been flagged as issues throughout the consultation submission received by SDCC. Key issues raised include: Disproportionate levels of zonings in certain areas (e.g. Lucan) Certain sites may be omitted from the proposed variation (e.g. Finnstown, Foxhunter, St. Edmunsbury etc.). Further to this, incorrect baseline figures and analysis have been suggested in submissions and used to undertake capacity audit. Additionally, it is also stated that adequate zoned land already exists within the county to meet current demand, contrary to capacity audit. The proposed variation is also suggested to undermine the SDCC own development plan. The topic of 'Overdevelopment' is dealt with in each of the various variation sites throughout this report, however, in a broader sense, the wider context is dealt with in some detail below to allow for wider consideration, notably in the comparative context of	*d. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and* *e. A Public Open Space Audit to inform proposals for public open space and recreational facilities.* **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines. required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Planning Authority progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility,

Lucan and Waterford, as well as how sites were selected. Submissions also raise consistent and strongly expressed concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by rapid population growth, disproportionate housing delivery, and inadequate supporting infrastructure. Residents emphasise that Lucan has undergone significant expansion over several decades, with population growth increasing from a small village of a few thousand in the 1980s, to approximately 15,000 by 1990, 57,000 by 2016, and circa 65,000 by 2026, largely driven by continuous residential development. This growth is frequently compared to that of a city, with Lucan now described as having a population broadly comparable to Waterford City, but without appropriate infrastructure, services or facilities. Concerns are further raised regarding density, noting that Lucan accommodates a similar population within a significantly smaller land area, resulting in a markedly more intense urban form. A key theme is the perception that Lucan and Adamstown have absorbed a disproportionate share of housing development within South Dublin, including the delivery of two Strategic Development Zones (Adamstown and Clonburris), with submissions highlighting that this is unique	sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county.

nationally. It is also noted that 64% of lands identified for additional development under proposed Variation No. 2 are located within the Lucan–Adamstown area, reinforcing concerns regarding imbalanced spatial distribution of growth. The cumulative pipeline of development is considered substantial, with thousands of units already delivered and significant additional capacity (including SDZ build-out lands and proposed rezonings) yet to be realised, potentially resulting in a further major increase in population. Submissions consistently assert that this level of growth has outpaced the delivery of critical infrastructure and services, resulting in existing deficits across multiple sectors. Transport infrastructure is identified as a primary constraint, with references to chronic congestion on the N4, Newcastle Road, Adamstown Road, R120 and within Lucan Village, where traffic is described as persistent throughout the day rather than limited to peak periods. Public transport is considered insufficient and unreliable, with overcrowded bus services, lack of rail or Luas connectivity, and the absence of a direct link to Dublin Airport highlighted as key failings. The projected growth associated with further rezonings is considered likely to exacerbate car dependency, congestion and associated environmental impacts.	**Overdevelopment – Lucan Wide Cumulative Impact** Submissions raise consistent and strongly held concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by cumulative population growth, a concentration of housing delivery, and infrastructure provision not keeping pace with development. The Planning Authority acknowledges that the Lucan–Adamstown area has experienced significant and sustained population growth over several decades, evolving from a small settlement into a major suburban population centre within the Dublin Metropolitan Area. The area forms part of a key growth corridor within the Dublin Metropolitan Area, where the availability of suitable and serviceable lands, including those proximate to existing and planned transport infrastructure, has been identified at regional and national level as critical to meeting housing demand. A central concern relates to the cumulative impact of development, with submissions asserting that population growth has outpaced the provision of critical infrastructure. Concerns relating to congestion on key transport routes, public transport capacity, and pressure on schools, childcare, healthcare and community facilities are recognised as part of the cumulative impact of growth in the area. Specific issues include traffic congestion on key routes such as the N4, Adamstown Road, Newcastle Road and within Lucan Village, alongside constraints in public transport capacity, including overcrowded bus services and reliance on future rail interventions. Submissions also highlight pressure on social infrastructure, including school places, childcare provision, healthcare services and community facilities, with references to oversubscription and capacity constraints. In addition, concerns are raised regarding the loss of greenfield lands and high-

Similarly, significant pressure is identified on social infrastructure, including school capacity, childcare provision and healthcare services. Submissions refer to school place shortages, oversubscribed facilities, and limited GP availability, with many practices reportedly not accepting new patients. Community, recreational and sports facilities are also considered deficient relative to the size of the population, with recent examples cited of facilities reaching capacity shortly after opening. This is compounded by concerns regarding utilities and drainage infrastructure, with suggestions that some systems are already approaching or exceeding operational capacity. A further critical issue is the loss of remaining greenfield and high-amenity lands, particularly at locations such as St. Edmundsbury, Finnstown and other proposed sites. These lands are described as important for biodiversity, landscape character, recreation, and climate resilience, as well as forming part of the wider Liffey Valley green infrastructure network. Their rezoning is viewed as contributing to the progressive erosion of natural and environmental assets in an area already experiencing extensive urbanisation. Overall, the issue of overdevelopment is framed in terms of cumulative impact, with submissions arguing that continued rezoning, in advance of infrastructure delivery, represents a	amenity areas, which are viewed as important for environmental quality, recreation and biodiversity. Submissions also raise concerns that a disproportionate quantum of lands identified under the proposed variation are located within the Lucan–Adamstown area. The Planning Authority acknowledges the perception that a disproportionate share of future development is directed to the Lucan area; however, the identification of lands is not based on geographic distribution, but on a rigorous, evidence-based assessment of suitability, infrastructure capacity, accessibility and alignment with national planning policy. In this regard, the availability of suitably located lands within the Dublin Metropolitan Area, including in Lucan–Adamstown, is a key factor in accommodating projected population growth. Submissions frequently draw comparisons with Waterford City to illustrate the scale of population growth; however, the Planning Authority considers that such comparisons require careful contextualisation. Waterford is designated under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) as a Regional City of Scale, with a defined Metropolitan Area Strategic Plan (MASP) and a clear national policy objective to achieve significant population growth supported by targeted investment in infrastructure, regeneration and metropolitan-scale services. By comparison, the Lucan–Adamstown–Palmerstown area forms part of the wider Dublin Metropolitan Area, where growth is planned and distributed across the region in accordance with national housing targets and strategic planning policy, and where the availability of land and proximity to transport corridors are key determinants in shaping development patterns.

“housing-led” rather than “infrastructure-led” approach. The prevailing concern is that further development will intensify existing deficits, leading to declines in quality of life, increased congestion and environmental pressure, and an erosion of local character and community cohesion, unless balanced by timely and proportionate investment in infrastructure and services. **Overdevelopment, Density, Housing, Phasing and Policy** A significant number of submissions object to the proposed residential zoning and associated Specific Local Objective (SLO) for Tubber Lane North (Amendment 4) on the grounds that the area has already experienced disproportionate levels of housing growth and that the proposal represents an unsustainable intensification of development in the wider Lucan–Adamstown area. Submissions repeatedly reference the scale of residential development already delivered and permitted within the Adamstown and Clonburris SDZ, noting that these areas remain incomplete, with substantial quantum of housing yet to be constructed. A number of submissions expressed concern that the proposed zoning of approximately 10 hectares at Tubber Lane North, with indications in several submissions received that the lands could	The revised NPF provides for substantial population growth within the Eastern and Midland Region, reflecting Dublin’s role as the primary engine of national population growth, while also supporting higher relative growth in regional cities to achieve balanced regional development. In this context, the Planning Authority considers that the proposed variation responds to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land be identified to meet increased and accelerated housing demand. Submissions question the necessity of proposed rezonings, with reference to the housing capacity identified in the South Dublin County Development Plan 2022–2028. While it is acknowledged that the Development Plan identified a substantial quantum of zoned land, subsequent to its adoption there have been significant changes in national planning policy, including the revised NPF and associated Section 28 Ministerial Guidelines. These guidelines require planning authorities to review their Core Strategy and zoning provisions to ensure alignment with updated housing targets and delivery requirements. In response, the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. This process included engagement with key internal departments and relevant infrastructure providers to ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development. The sites identified under the proposed variation were selected on the basis of this evidence-based assessment, having regard to their proximity to existing and planned infrastructure, their capacity to

accommodate approximately 430 residential units, would further intensify development pressure in an area already perceived to be operating beyond its practical carrying capacity, as well as the nearby planned infrastructure for the SDZs. Many submissions state that the proposal risks repeating what they describe as historic planning failures, whereby housing delivery has significantly outpaced the provision of supporting infrastructure and services. Several submissions raise concerns regarding density and typology, including the absence of detail regarding building heights, housing mix, and layout. In this context, submissions express concern that higher-density or multi-storey development could adversely impact residential amenity in adjoining established neighbourhoods through loss of daylight, overshadowing, overlooking and a perceived erosion of the existing character of the area, if built out at higher densities. A number of submitters specifically query whether higher-rise development or social housing is envisaged, stating that the absence of such clarity undermines meaningful public engagement with the proposal. Across almost all thematic areas, submissions emphasise the importance of strict phasing and infrastructure-led development. Many submitters explicitly request that the Tubber Lane North SLO be amended to strengthen its wording, particularly in	support appropriate densities, and their alignment with compact growth and transport-oriented development principles. Importantly, future development is not unstructured but will be coordinated through the application of site-specific Specific Local Objectives (SLOs) and the Development Plan framework. Zoning represents a strategic first step and does not, in itself, facilitate immediate development. The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. In this way, SLOs provide a structured mechanism to ensure that development is aligned with available or planned infrastructure and proceeds in a coordinated manner. Furthermore, the SLOs ensure that development proposals are subject to detailed assessment and coordination, thereby avoiding piecemeal or uncoordinated development and ensuring that infrastructure requirements, including transport demand, are clearly identified and addressed at the appropriate stage. The Council has also delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. These investments demonstrate the Council's ongoing commitment to aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the

relation to the timing of development relative to DART+ Southwest and the delivery of Tobermaclugg Park. It is argued that references to the commencement of infrastructure projects are insufficient to ensure that capacity is available when residents move into new developments. Submissions call for legally robust and enforceable provisions requiring that development cannot commence or be occupied until key transport, parks and community infrastructure are fully operational. Several submissions cite national planning policy, including Project Ireland 2040 and the National Planning Framework, in support of an infrastructure-first approach, however, do not believe the SLO or current phasing arrangements are adequate. Overall, submissions seek either the removal of the residential zoning at Tubber Lane North or, at minimum, a significant reduction in scale and density (where possible), with many stating that no further residential land should be zoned in Lucan until existing zoned lands, particularly the SDZs, are substantially delivered and appropriately serviced. **Zoning** The submissions overwhelmingly object to the proposed rezoning of lands, particularly at Tubber Lane North and wider Lucan/Adamstown areas. The main concerns relate to inadequate infrastructure—	Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone (SDZ) framework represents best practice in the coordinated delivery of large-scale residential communities. These areas have been planned and phased to provide for the delivery of community facilities, transport infrastructure and open space in tandem with population growth. This approach reflects a coordinated, urban design-led model of development, promoting the efficient use of land and supporting transport-oriented development. The experience of the SDZs has informed the Council's approach to future growth, and the Planning Authority will continue to apply and reflect on the lessons learned to ensure that development is delivered in a coordinated and sustainable manner. The delivery of infrastructure such as DART+ South West, BusConnects and active travel networks provides the basis for improved sustainable mobility within the wider area. It is recognised that public transport service provision and service levels are a matter for the National Transport Authority (NTA) and relevant operators. The Planning Authority will continue to engage with the NTA and other stakeholders to ensure that future transport demand arising from population growth, including that facilitated by these rezonings, is planned for and responded to in a coordinated manner, aligned with national and regional transport strategies. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools,

including transport, roads, utilities, and community services—with repeated calls for the DART South West and other major transport projects to be fully operational before any development proceeds. Many submissions argue that the area is already overdeveloped, with a disproportionate level of new housing proposed for Lucan compared to other parts of the county, and that existing SDZ lands have not yet been fully delivered. Physical constraints are also highlighted, particularly the narrowness and unsuitability of Tubber Lane for large-scale housing. Environmental and amenity concerns feature strongly, including loss of green buffer lands, impacts on local character, and reduced privacy, light, and property values. Some submissions emphasise the role of the lands as a transitional or buffer zone, including between residential areas and Lucan Golf Club. Overall, submitters request that rezoning be halted or deferred until infrastructure capacity is demonstrated and key developments are completed, and that greater balance and supporting services be provided. **Transport** *Traffic and Roads* Traffic congestion and road capacity constraints form one of the most consistently raised and strongly articulated objections in the submissions relating to Tubber Lane North. Submitters describe the local and strategic road network as already operating at or beyond capacity, with persistent congestion during	neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated district and neighbourhood transport assessments. This will inform detailed engagement with both elected members and national transport agencies on future transport options and potential projects. This study will develop a transport strategy. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. While the cumulative nature of development in the Lucan–Adamstown area is acknowledged, it is managed through ongoing coordination of land use, infrastructure planning and delivery. In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools, health care, and transport services by relevant agencies. As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of

peak hours along Adamstown Road, Newcastle Road (Supervalu Junction / Roundabout), the N4 corridor and through Lucan village. Many submissions emphasise that Tubber Lane, itself, is a narrow and constrained road, with limited vehicular access, and is currently used extensively for walking, cycling and recreational purposes by local residents. Submissions state that the physical characteristics and constraints of Tubber Lane render it unsuitable to accommodate traffic movements associated with large-scale residential development. Concerns are raised regarding road safety, particularly for pedestrians, cyclists and children, with submitters arguing that increased traffic volumes would materially alter the existing low-traffic and family-friendly nature of the area. References are also made to increased rat-running through residential estates as drivers seek to avoid congested routes, further compounding safety and congestion issues. A recurring theme is that no tangible or committed road infrastructure upgrades have been identified that would adequately mitigate the traffic impacts arising from the proposed zoning. Several submissions question whether cumulative traffic impact assessments have been undertaken in the context of multiple rezonings proposed under Variation No. 2 and the ongoing build-out of Adamstown and Clonburris SDZs. In this regard,	infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. The Planning Authority will continue to engage with relevant agencies to align future development with the timely delivery of supporting infrastructure. Overall, the concerns raised regarding overdevelopment, infrastructure capacity and quality of life are acknowledged. However, the Planning Authority is satisfied that the proposed variation is grounded in national policy, statutory requirements and a coordinated development framework. The approach seeks to balance the need to accommodate ongoing population growth within the Dublin Metropolitan Area—supported by the availability of suitable lands—with the delivery of infrastructure, sustainable transport integration and the principles of compact, transit-oriented development, while contributing to broader national objectives of balanced regional growth. **Overdevelopment, Density, Housing, Phasing and Policy** The Planning Authority notes the range of issues raised in submissions relating to phasing, policy compliance, overdevelopment, density and housing in the context of the proposed zoning and Specific Local Objective at Tubber Lane North (Variation Site No. 4), as well as the wider Lucan area. These matters are interrelated and have been considered in a holistic manner, having regard to national and regional planning policy, the statutory framework of the Adamstown SDZ Planning Scheme, and the provisions of the South Dublin County Development Plan 2022–2028.

submitters argue that additional development at Tubber Lane North would exacerbate an already critical situation and would be premature in the absence of comprehensive road network improvements and assessments. *Public Transport* Public transport capacity, frequency, and reliability are repeatedly cited as major constraints, with submissions asserting that existing services are insufficient to support the current population, let alone additional development. Submitters describe bus services in the area as overcrowded, unreliable and, in some cases, reduced in route / location coverage following the implementation of BusConnects. References are made to "ghost buses," full buses passing stops at peak times, and reduced accessibility for certain neighbourhoods. Furthermore, submissions note that the bus services have been extended to Adamstown rather than Adamstown having its own separate service, resulting in full buses passing through areas which previously would have had spare capacity. Rail services are similarly described as operating at capacity, particularly during peak commuting periods. Although the proximity of Adamstown railway station is acknowledged, many submissions argue that the service levels are inadequate and that significant population growth prior to enhancement of rail capacity would place unsustainable pressure	The Planning Authority acknowledges the submission's reference to a systems-thinking approach, which emphasises the interrelationship between land use, infrastructure, environmental protection and community wellbeing. It is considered that this approach is reflected in the preparation of the proposed Variation, which has been informed by the Strategic Environmental Assessment, Appropriate Assessment, infrastructure capacity assessments, and extensive engagement with both internal departments and external agencies (including the NTA and Uisce Éireann). The Variation forms part of a broader, plan-led framework, aligned with the National Planning Framework and Regional Spatial and Economic Strategy, which explicitly integrate housing delivery with environmental protection, climate resilience, transport investment and infrastructure provision. The use of Specific Local Objectives (SLOs), masterplanning requirements, and infrastructure audits further ensures that cumulative impacts and cross-sectoral dependencies are addressed in a coordinated manner. <u>Phasing and Overdevelopment</u> The Planning Authority acknowledges concerns regarding phasing and cumulative development; however, CS7 SLO 5 provides a clear and enforceable framework to ensure that development at Tubber Lane North is appropriately sequenced in tandem with infrastructure planning and delivery. The SLO links development to the delivery of key infrastructure within the Adamstown SDZ Planning Scheme, including Tobermaclugg Park (Phase 9), while also requiring site-specific infrastructure and alignment with network capacity, including engagement with Uisce Éireann.

on the system. Furthermore, submissions also reference the delay to DART+SW and the reference to the commencement of construction in the related SLO for Tubber Lane North. Submissions also outline the absence of a direct public transport connection between Lucan and Dublin Airport. This is repeatedly cited as evidence of broader deficiencies in strategic transport planning for the area. A submission was also received from the NTA with regard DART+ and the ongoing delivery of same, noting the distance of the site to existing train link, NTA states that there may be merit in removing the SLO to with regard the DART+ programme. A submission was also received from Irish Rail with regard DART+SW and the delivery of same, specifically they notes the constraints on the following housing delivery objectives and the requirement for a Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact. As stated above, a central concern expressed across a large range of submissions relates to the wording of the Tubber Lane North SLO, which states that development may not commence until DART+ Southwest has commenced construction. Submissions argue forcefully that the commencement of construction does not equate to	In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools and community facilities by relevant agencies. As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of additional zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. Adamstown SDZ demonstrates delivery within a structured, plan-led framework, supported by significant infrastructure investment to date, including: • Water and wastewater infrastructure, including Tobermaclugg Pumping Station • Adamstown Railway Station • Retail centres at The Crossings and Tobermaclugg (with future provision at Tandy's Lane) • Five schools (three operational, two permitted, one due to commence shortly) • Community Centre • Primary Care Centre and childcare provision

the availability of enhanced transport capacity and that allowing development to proceed on this basis would result in years of additional congestion and pressure while works are ongoing. Many submissions therefore seek an amendment to the SLO to require that development cannot commence or be occupied until DART+ Southwest is fully operational. *Active Travel* A limited number of submissions refer indirectly to active travel considerations in the context of Tubber Lane's existing function. Submissions note that Tubber Lane is currently used extensively for walking, cycling and informal recreation due to its narrow profile and limited/no vehicular access. Concern is expressed that residential development facilitated by the proposed zoning would fundamentally alter this role, increasing vehicular traffic and reducing the safety and attractiveness of the route for pedestrians and cyclists. It is argued that increased development would undermine existing active travel patterns rather than enhance them, and that no compensatory pedestrian or cycling infrastructure has been identified. *Parking* Parking is raised in several submissions, primarily as a secondary impact of increased residential development rather than as a standalone issue. Submissions express concern that reduced parking provision within new developments, combined with	• Parks and open space, including two completed major parks, Central Boulevard Park under construction, and Tobermaclugg Park (Phase 9 requirement) • Further infrastructure, including a Civic Building with library, community space and enterprise centre, has also received planning permission. It is also noted that the delivery of Adamstown SDZ is occurring over an extended period, including the economic downturn, during which housing delivery slowed significantly; as a result, the delivery of associated community and social infrastructure, which is intrinsically linked to the pace of housing development, was correspondingly delayed. The Planning Authority considers that the established infrastructure within the Adamstown SDZ will support future residents of Tubber Lane North, alongside additional site-specific infrastructure requirements under the SLO. While the lands will integrate physically with the Adamstown SDZ, they are not intended to act as a primary driver of infrastructure demand but will instead form a limited extension supported by, and complementary to, the existing and planned SDZ framework. Overall, the combined SDZ framework and SLO safeguards provide a robust, infrastructure-led mechanism to address concerns regarding overdevelopment and ensure that development proceeds in a coordinated, phased and sustainable manner.

limited public transport capacity, would lead to overspill parking onto narrow local roads and into established residential estates. It is argued that this would further compromise road safety, access for emergency vehicles and residential amenity. Some submissions reference experiences elsewhere in Lucan and Adamstown where parking pressure from higher-density developments has resulted in congestion and informal or unsafe parking practices. **Community and Social Facilities and Schools** A number of submissions highlight significant deficits in existing community and social infrastructure capacity in the wider Lucan and Adamstown area. Submitters state that facilities such as community centres, libraries, leisure and sports facilities, youth amenities and social spaces have not been delivered in line with population growth, notably within the SDZ, and that existing facilities are under severe pressure. Several submissions reference specific facilities promised under earlier phases of the Adamstown SDZ, including a library and leisure or gym facilities, which remain undelivered many years after housing has been delivered and occupied. It is argued that additional residential development at Tubber Lane North would further dilute access to already limited community infrastructure and that no clear or binding commitments have been provided to ensure timely delivery of additional facilities. Submissions emphasise that community cohesion	The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. <u>Density</u> Concerns regarding density and building height are noted. Residential density is guided by national policy, particularly the Sustainable Residential and Compact Settlement Guidelines (2024), which require efficient use of well-located land proximate to services and public transport. Detailed matters such as density, height and layout will be determined at planning application stage, having regard to applicable national guidance and Development Plan standards. Any proposals must demonstrate high-quality design and appropriate integration with surrounding areas. Proposals that do not meet these standards will not be supported. <u>Housing</u> Overall, the Planning Authority is satisfied that the Specific Local Objective for Tubber Lane North provides a robust, masterplan-led framework to ensure that development is appropriately phased, infrastructure-led and aligned with the carrying capacity of the wider area. The SLO incorporates clear requirements for comprehensive masterplanning, infrastructure audits and coordination with the Adamstown SDZ Planning Scheme, ensuring that development proceeds in tandem with planning and delivery of supporting infrastructure. When read in conjunction with the South Dublin County Development Plan 2022–2028 and the statutory SDZ framework, the

and quality of life are being undermined by a pattern of development that prioritises housing numbers without parallel investment in social infrastructure. *Schools* Capacity constraints within primary and secondary schools are raised as a critical concern in a large number of submissions received in response to the consultation regarding amendment no.4. Submitters state that local schools in Lucan are oversubscribed or operating at or near capacity, with references made to the use of temporary modular classrooms and the loss of recreational space within school grounds to accommodate additional pupils due to population growth in the wider Lucan area. Several submissions note that families are already required to seek school places outside the area, including in neighbouring towns, highlighting the ongoing strain on the education system. Concerns are expressed in submissions that no firm commitments or timelines have been provided for the delivery of additional schools to support further residential growth at Tubber Lane North. Some submissions reference the absence of a defined school catchment for certain nearby estates, adding to uncertainty for families. In this context, submitters argue that further zoning should not proceed unless it can be clearly demonstrated that sufficient educational capacity will be delivered in advance of or concurrently with new housing.	SLO forms part of a coherent and enforceable planning structure that has demonstrated the ability to deliver residential development alongside essential physical, social and community infrastructure. This approach directly addresses concerns regarding overdevelopment, density and infrastructure capacity, while ensuring that detailed matters such as typology, design quality and development intensity are appropriately assessed at planning application stage. The Planning Authority notes that the zoning of lands for residential use does not predetermine housing typology, building height or tenure mix, as these matters will be addressed through a masterplanning process and assessed at planning application stage in accordance with site-specific design and policy requirements. Social and affordable housing will be delivered in line with statutory obligations under the Planning and Development Acts (including Part V) and does not require separate zoning. The proposed zoning is consistent with national and regional policy objectives promoting compact, sustainable growth and the efficient use of land within strategic metropolitan locations, supported by existing and planned infrastructure, including that associated with Adamstown SDZ while also providing for site-specific servicing. The safeguards contained within CS7 SLO 5, together with its refinement, ensure that infrastructure delivery—particularly transport and utilities—is appropriately aligned with development. Accordingly, the Planning Authority considers that the proposed zoning and associated SLO are appropriate, proportionate and consistent with proper planning and sustainable development, and provide a robust framework to ensure that development at Tubber Lane North is

A submission was received from the Department of Education and Youth with regard to the Lucan, Adamstown and Palmerstown in response to the additional zoning in the Adamstown area (including Tubber Lane). The Department indicated that the population expansion would likely generate demand for at least two additional primary schools, together with further post-primary provision, depending on demographic factors and the extent to which projected growth materialises. In this context, the Department emphasises the importance of ongoing coordination between South Dublin County Council and the Department of Education and Youth to plan for school capacity in the Lucan–Adamstown–Palmerstown area and welcomes continued engagement on this matter. **Parks and Open Space** Submissions express concern regarding the adequacy of parks and open space provision in the area. Submitters state that existing facilities, including Airlie Park, are insufficient to meet the needs of the existing population and that opportunities for informal recreation and community use are already limited. Particular emphasis is placed on the non-delivery of Tobermaclugg Park, identified as a key piece of strategic open space within the Adamstown SDZ Planning Scheme, as amended. Submissions note that the Tubber Lane North SLO refers to the phasing of development in tandem with	delivered in a coordinated, phased and sustainable manner, linked to, but independently serviced from Adamstown. **Zoning** The Planning Authority notes the concerns raised in submissions regarding infrastructure capacity, the scale and location of development, and the timing of delivery in the Tubber Lane North and wider Lucan/Adamstown area. It is important to clarify that the requirement to zone additional lands for residential development arises from national policy. Local authorities are obliged, under the National Planning Framework (NPF) and associated Section 28 Planning Guidelines, to ensure sufficient zoned land is available to meet population growth and housing delivery targets allocated to each county. This Variation forms part of the Council's statutory role in implementing these national objectives and contributing to the delivery of housing in a planned and coordinated manner. In identifying lands for rezoning, the Council has applied the principles of proper planning and sustainable development, including the NPF's key objectives of compact growth and transit-oriented development (TOD). The subject lands were assessed having regard to their proximity to existing and planned infrastructure, services, and public transport corridors, as well as their potential to support the consolidation of existing settlements in a sequential and sustainable manner. SDCC further notes that concerns regarding premature development are addressed through the inclusion of a Specific Local Objective (SLO), which explicitly links the delivery of development to the provision of key supporting infrastructure. This ensures that development cannot proceed in an uncoordinated manner and will instead occur in tandem with the delivery of critical infrastructure,

the delivery of Tobermaclugg Park but argue that the wording lacks clarity and enforceability. Many submissions state that the phrase “commenced construction” is vague and inadequate and that the park should be fully completed and accessible prior to any residential development at Tubber Lane North. Some submitters contend that the lands at Tubber Lane North would be more appropriately retained wholly or partly as open space, given their proximity to existing residential areas and the wider recreational deficit. **Biodiversity, Environment, Green Infrastructure** Environmental considerations form a major strand of objection in the submissions. Many submitters challenge assertions that development at Tubber Lane North would involve minimal ecological or environmental constraints. Submissions highlight the ecological value of the lands, including existing hedgerows, wildlife habitats and the relationship of the site to the River Liffey and its riparian corridor. Reference is made to provisions within the Adamstown SDZ Planning Scheme regarding the protection and enhancement of historic hedgerows, with concern expressed that large-scale residential development could result in loss or fragmentation of existing green infrastructure. Increased traffic, noise and air pollution arising from additional development are also cited as factors that would adversely impact the local environment and biodiversity.	including strategic public transport such as DART+ South West, alongside local services and amenities. Overall, the proposed rezoning seeks to balance the need to meet national housing targets with the requirement to ensure that development is delivered in a phased, infrastructure-led manner, in accordance with the principles of proper planning and sustainable development**.** **Transport** The Planning Authority notes the range of issues raised in submissions relating to traffic, road capacity, public transport provision, active travel and parking in the context of the proposed zoning and Specific Local Objective (SLO). These issues have been carefully considered in light of the statutory framework of the Adamstown SDZ Planning Scheme, the South Dublin County Development Plan 2022–2028, and ongoing engagement with the National Transport Authority (NTA). National planning and transport policy, including the National Planning Framework, National Development Plan and National Sustainable Mobility Policy, establishes a clear direction towards reducing reliance on the private car and promoting more sustainable travel patterns. This is reflected in the “Avoid–Shift–Improve” framework, which seeks to reduce the need to travel, shift trips to public transport and active travel, and improve transport efficiency. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of

Several submissions emphasise the importance of retaining green corridors and open land as part of a wider network supporting biodiversity, climate resilience and quality of life, and argue that further erosion of such lands runs counter to national and regional planning policy objectives. A submission was also received from the Department of Housing Local Government and Heritage (DHLGH), Development Application Unit on heritage-related (mostly environmental) observations / recommendations. In summary these were that the proposed variation involves the rezoning of approximately 156 hectares of land for residential development, including areas currently designated as Rural, Open Space, and High Amenity. This raises an overarching concern regarding the likely reduction in biodiversity across multiple sites, with potential impacts on species such as badgers, bats, otters, amphibians, birds, and protected plant species. Key risks identified include habitat loss, disturbance from inappropriate lighting (particularly affecting bats), and encroachment into sensitive ecological corridors. To address these issues, it is recommended that biodiversity protection be fully integrated into all development proposals, that lighting in sensitive areas be designed to be bat-friendly, motion-activated, and avoid spill into natural habitats, and that strong ecological buffers—especially near protected areas—be maintained or enhanced.	development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. For Tubber Lane North, the site has a direct active travel connection into Adamstown SDZ providing future residents the opportunity to access the recreational amenities in Tandy Lane and Airlie Park, transport infrastructure, the Adamstown District Centre and planned Adamstown civic uses. The SLO establishes a clear requirement for a masterplan-led approach, supported by a Transport and Traffic Assessment, to ensure that all transport-related issues—including cumulative impacts—are comprehensively assessed and addressed, whilst also catering for environmental considerations. *Traffic and Roads* The Chief Executive acknowledges concerns regarding traffic congestion and road capacity, particularly at peak times on Adamstown Road, Newcastle Road, the N4 corridor and within Lucan Village, in the context of cumulative growth in the wider area. The Planning Authority emphasises that zoning does not predetermine access or traffic levels, which will instead be addressed through the SLO-led masterplanning process and a Transport and Traffic Assessment, ensuring protection of local road function, avoidance of rat-running and integration with the wider network in line with the Adamstown SDZ movement framework and DMURS principles. It is recognised that Tubber Lane currently functions as a low-capacity, locally sensitive route, and any future development proposals will be required to demonstrate that access arrangements, traffic volumes and road safety impacts are appropriate to the character and capacity of the receiving environment.

Furthermore, all development should be guided by comprehensive ecological assessments to ensure informed and sustainable outcomes. The DHLGH (NPWS) submission indicates that Tubber Lane North variation site involves the rezoning of lands from Rural to Residential and Open Space, with the designated open space comprising a former quarry now supporting spontaneous woodland and a water-filled basin. This area is likely to support a range of ecological features, including amphibians such as smooth newt and common frog, several badger setts, and a diverse bird population. In addition, Inland Fisheries Ireland highlights concerns regarding the potential impact of the proposed Variation on water quality, flood risk and aquatic ecosystems, noting that the SEA does not fully address the requirements of the EU Nature Restoration Regulation. The submission emphasises the need to protect surface and groundwater under the Water Framework Directive and warns that insufficient maintenance of SuDS infrastructure could increase flood risk and degrade water quality. IFI also raises concerns about wastewater network capacity, including existing pressure on the foul conveyance system and increased instances of CSO discharges, and advises that significant investment in water and wastewater infrastructure will be required to support future development without adversely affecting the aquatic environment.	The SLO further requires improved pedestrian and cycle connectivity, including enhanced linkages—potentially via Tobermaclugg Park—to public transport and surrounding networks. The Council continues to work with the NTA and TII on strategic transport improvements, including the western orbital study, and is undertaking ongoing monitoring of traffic conditions across the western part of the County. It is considered that, subject to compliance with the SLO and implementation of appropriate mitigation measures, traffic and road impacts can be mitigated. *Public Transport* The Chief Executive acknowledges concerns regarding public transport capacity, frequency and reliability, including bus overcrowding and rail constraints. Engagement with the NTA and relevant stakeholders is ongoing in respect of strategic projects such as DART+ South West, which will enhance capacity and support modal shift. The SLO for the lands links development to the progression of high-capacity public transport infrastructure, including DART+ South West. While recognising the NTA's view that the direct relationship between the site (approximately 1.5km from Adamstown Station) and DART+ South West requires clearer justification, the Planning Authority considers that enhanced rail capacity remains strategically important, as well as the transport links outlined below, and therefore has sought to keep the, now amended, SLO, relating to the provision of rail services or similar in as part of the variation lands. While the site will be primarily served by bus and active travel infrastructure the lands are located approximately 900m from bus services along Celbridge Road (C4 and X27) and are accessible to

Flood Risk / Flood Zone / SFRA /Surface Water and Riparian Corridors Several submissions explicitly reference flood risk mapping and the Strategic Flood Risk Assessment. Submissions state that the inclusion of lands within Flood Zones A and B necessitates a precautionary approach and that development should not proceed without comprehensive, site-specific flood risk assessment demonstrating compliance with national flood risk management guidelines. It is argued that zoning land for residential development in areas subject to flooding introduces long-term risk to residents and undermines the credibility of flood-risk-led planning. Environmental considerations are a prominent issue in submissions, with particular emphasis on the ecological importance of the riparian corridor adjoining the Tubber Lane North lands. This corridor functions as a critical ecological buffer, supporting water quality, flood management and biodiversity, while providing habitat connectivity and stabilising riverbank conditions. Submissions highlight that parts of the Tubber Lane North lands are low-lying and susceptible to surface water accumulation during heavy rainfall events. It is argued that increased hard surfacing associated with residential development could exacerbate surface water runoff unless robust and demonstrably effective drainage measures are implemented.	services on Shackleton Drive (C2 and X30), with the potential for linkages to be enhanced through future development and the delivery of Tobermaclugg Park. It is noted that public transport service frequency, routing and capacity are operational matters determined by the National Transport Authority and service providers. The primary role of the Planning Authority is to support and align with the delivery of strategic transport infrastructure, such as DART+ South West and the BusConnects programme, which provide the physical capacity upon which service levels are subsequently based and rely on the statutory remit of the NTA to provide appropriate service levels in response to population growth. In this context, the delivery of infrastructure represents the key measurable milestone to link to growth. The requirement for a Transport and Traffic Assessment under the SLO will ensure that options to improve connectivity to high-capacity public transport, including the rail network, are fully examined and incorporated into development proposals. SDCC has considered the responses from the NTA, however sees the merits of continuing to keep the link to DART+SW to promote a modal shift and behaviour change, which is considered TOD and in conformity with the NPF. Notwithstanding the NTA comments, the SLO has been amended to reflect alternative rail solutions to DART+ in the interim pending its commencement. **CE Recommendation** Amend wording of the SLO no. CS7 SLO5 to reflect requirement to ensure alignment with DART+SW or any other future iteration of same in response to the comments made from the NTA:

Several submissions contend that reliance on open space within flood-prone areas to address surface water issues may result in amenity spaces that are frequently unusable. Some submissions argue that reliance on such areas to offset flood risk undermines the quality and usefulness of open space provision. In this context, submitters seek stronger safeguards within the SLO to ensure flood risk is fully addressed and does not result in residual risks to residents or degradation of amenity. **Water and Wastewater / Utilities** Several submissions raise concerns regarding the capacity of water supply and wastewater infrastructure to accommodate additional development at Tubber Lane North. These submissions state that utility infrastructure has not visibly expanded in line with recent housing delivery in the wider Lucan and Adamstown area and express scepticism that existing systems have sufficient spare capacity. While submissions do not provide technical evidence, they argue that cumulative impacts from multiple rezonings have not been clearly assessed and that further development risks additional strain on already pressured infrastructure. Uisce Éireann (UE) has advised that development at Tubber Lane North (Ref. No. 4) can be accommodated subject to infrastructure upgrades.	*'Development may not commence until Dart+ Southwest **or the commencement of an equivalent rail service to the Dart** has commenced construction **or operation, as may be relevant'*** *Active Travel* The Chief Executive acknowledges concerns regarding the potential impact of development on Tubber Lane as an established walking and cycling route. The promotion of active travel is a key objective of national policy, the County Development Plan, and the Adamstown SDZ Planning Scheme. The subject lands are to be integrated into an established (Tubber Lane) and expanding network of pedestrian and cycle routes within the wider area, linking to Adamstown and beyond. The SLO requires a masterplan-led approach that prioritises permeability, safety and connectivity for pedestrians and cyclists, ensuring that development enhances rather than undermines existing active travel patterns, such as Tubber Lane and Celbridge Link Road. The application of DMURS principles will ensure that streets are designed as people-focused environments with reduced vehicle dominance. Development proposals will be required to demonstrate high-quality active travel integration, including links via Tobermaclugg Park and to surrounding services, schools and transport nodes. *Parking* The Chief Executive notes concerns regarding parking pressure and potential overspill into surrounding areas.

The water supply is to connect to the Adamstown SDZ network, with upgrades required, while the wastewater network will require downstream upgrades from the Tobermaclugg Pumping Station. UE has also indicated that further technical studies and a comprehensive masterplan will be necessary to confirm capacity and servicing solutions, consistent with the SLO's infrastructure-led approach. Beyond water and wastewater, a small number of submissions refer more generally to utilities, including energy and telecommunications infrastructure. These submissions contend that no clear evidence has been provided to demonstrate that utility services are capable of accommodating additional residents without significant upgrades. References are made to previous experiences in the area where infrastructure upgrades lagged behind housing delivery, resulting in service disruption or reduced resilience. Furthermore, the ESB highlights the critical importance of electricity infrastructure in supporting housing and economic development, noting that modern homes require significantly greater electrical capacity than those built prior to 2019. This increased demand, combined with climate change pressures, necessitates the expansion and reinforcement of the electricity network to ensure reliability and resilience. ESB emphasises that substantial upgrades to transmission and distribution	The approach to car parking in the County is directly informed by national planning policy and reflects a clear shift towards supporting sustainable transport and reducing reliance on the private car. The South Dublin County Development Plan 2022–2028 adopts maximum (not minimum) car parking standards, which are applied on a location-based, accessibility-led approach. These standards vary across the County depending on access to public transport and services. National policy, particularly the Sustainable Residential Development and Compact Settlements Guidelines (2024), reinforces this approach and introduces Specific Planning Policy Requirements (SPPRs) which planning authorities are required to apply. Future development proposals must demonstrate compliance with these standards, having regard to site accessibility, density and availability of alternative transport modes. The SLO supports enhanced connectivity to public transport and active travel infrastructure, which will reduce reliance on private car use over time, while ensuring that adequate and appropriate parking provision is delivered. *Transport Summary* Overall, the Planning Authority is satisfied that transport-related issues associated with the proposed zoning at Tubber Lane North can be appropriately mitigated. The Specific Local Objective provides clear and enforceable mechanisms, including the requirement for a masterplan and Transport and Traffic Assessment, to ensure that traffic, public transport, active travel and parking considerations are comprehensively assessed and mitigated. **Community and Social Facilities, and Schools**

infrastructure will be required to support the delivery of national housing targets, including up to 300,000 new homes. **Climate Action** Climate action considerations are raised indirectly in a limited number of submissions. These submissions argue that continued low-density expansion and further car-dependent development in the Lucan–Adamstown area is inconsistent with national and county climate objectives. Reference is made to increased traffic congestion, longer commute times and reliance on private vehicles as outcomes that would increase emissions. Submissions contend that development at Tubber Lane North, in advance of high-capacity public transport being operational, undermines climate-aligned planning principles. A number of submissions make broader environmental arguments beyond biodiversity and flood risk, raising concerns regarding air quality impacts arising from increased traffic, noise pollution during both construction and occupation phases, and the gradual loss of perceived environmental quality within the area resulting from climate change. Submissions argue that the cumulative effect of ongoing development has already diminished environmental conditions in Lucan and that further rezoning would exacerbate this trend. **Heritage and Archaeology**	The Chief Executive notes the concerns raised in submissions regarding the capacity, delivery, and coordination of community, social and educational infrastructure within the wider Lucan and Adamstown area, including perceived delays in the provision of facilities and pressures arising from ongoing population growth. The Planning Authority recognises concerns regarding the timing of infrastructure delivery in developing areas and future proposals will be assessed with regard to the availability of supporting services and infrastructure at the time of planning application in accordance with the CDP. In response, it is important to emphasise that the Adamstown Strategic Development Zone (SDZ) is a statutory, plan-led framework that provides for the phased and coordinated delivery of residential development alongside community, social and educational infrastructure. The SDZ has already delivered a substantial range of facilities, including a Local Centre with retail and café uses, childcare provision, two parks, a primary care centre, a community centre, a District Centre, and three schools on Station Road, some / all of which exceed the Planning Scheme minimum requirements, having been delivered with 32 classrooms each. The Planning Scheme further provides for the delivery of additional infrastructure, including a library and community facility, an enterprise centre, two further parks, additional childcare provision, and a future Local Centre. The Council has recently improved community and social infrastructure in the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House and the continued

Heritage and archaeological issues are referenced only tangentially in the submissions relating to Tubber Lane North. Some submissions refer generally to the historic character of Lucan and its landscape setting, expressing concern that incremental development has eroded this character over time. **Aviation Safeguarding** A submission was received from TPA consultants on behalf of Weston Airport. Support was indicated for the overall intent of Proposed Variation No. 2, and South Dublin's approach to aligning the Development Plan with the National Planning Framework (NPF) Housing Growth Requirements (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). The primary purpose of the submission is to safeguard the current and future operational, safety and technical requirements of Weston Airport, in accordance with Section 11.8.3 of the South Dublin County Development Plan 2022–2028. The submission notes that a number of land parcels proposed for rezoning and requests that any future planning applications on these lands be carefully assessed to ensure there are no adverse impacts on the operational integrity of Weston Airport, aviation safety requirements, and associated specialist aviation activities, including the Irish Coast Guard	development of Griffeen Park. In this regard, the zoning of lands at Tubber Lane North will contribute to the ongoing review and refinement of social infrastructure planning by the Council, including engagement with key stakeholders such as the Department of Education, the Health Service Executive and the National Transport Authority to identify and address emerging demands. *Schools* In terms of educational provision, two additional school sites are planned and progressing: School Site 3 at Tandy's Lane (primary with SEN provision) and School Site 4 at Aderrig (flexible primary or post-primary use). Both sites have planning permission, are being advanced by the Department of Education and Youth and include provision for interim accommodation (e.g. modular classrooms) to ensure timely capacity delivery aligned with residential occupation. These form part of a statutory framework and are not aspirational. While generalised pressures in school enrolment and community facility demand across the wider Lucan area are acknowledged, the Planning Authority is satisfied that the combined application of the Adamstown SDZ Planning Scheme, the County Development Plan, and the Tubber Lane North SLO provides a comprehensive and enforceable framework to address these issues. This framework ensures the coordinated, proportionate, and timely delivery of community, social and educational infrastructure, thereby safeguarding community cohesion and quality of life. In response to the DOEY and the need for additional school capacity area flagged in the response, it is appropriate to include an updated SLO to reflect same.

Search and Rescue helicopter operations based at the airport. It is highlighted that Weston Airport, in consultation with the Irish Aviation Authority (IAA), is currently implementing RNAV (Area Navigation) approach procedures for Runway 07/25. These procedures will be used by the Coast Guard Search and Rescue service and are identified as particularly sensitive to inappropriate development that could interfere with flight paths, safety surfaces, or navigational requirements. Overall, while supporting the strategic aim of increased housing delivery, the submission emphasises the importance of ensuring that future development near Weston Airport is managed in a manner that avoids conflict with aviation operations, through careful planning assessment and adherence to existing airport-related policy provisions in the Development Plan. **Environmental Assessment** *Strategic Environmental Assessment (SEA)* A small number of submissions refer to the broader environmental assessment framework, questioning whether the 'cumulative impacts' of rezonings within Lucan, including Tubber Lane North, have been adequately assessed through the Strategic Environmental Assessment process. These submissions argue that incremental rezonings, when	Accordingly, the Planning Authority is satisfied that the proposed zoning and associated proposed amended Specific Local Objective (SLO) incorporate appropriate safeguards to ensure that development at Tubber Lane North is supported by the necessary infrastructure, consistent with national and local policy. The SLO provides a robust, masterplan-led mechanism requiring the preparation of a Social Infrastructure Audit to assess existing provision, identify deficits and determine future community and educational needs, thereby ensuring that infrastructure is clearly identified and delivered in tandem with, or in advance of, residential development. Given the scale of the proposed zoning, the Planning Authority considers that detailed alignment with wider school provision is appropriately addressed at a strategic level through the Development Plan and SDZ framework, rather than through site-specific policy at this location. **CE Recommendation** Amend wording of the SLO no. CS7 SLO5 to reflect requirement to ensure adequate future capacity within the wider vicinity in respect of school delivery, and continuing to liaise with the DOEY: ***g. ensure adequate educational capacity for sites adjacent to Adamstown are catered for , in consultation with the Department of Education and Youth*** **Parks and Open Space** The Chief Executive notes the concerns raised in submissions regarding the adequacy, timing and delivery of parks and open space provision within the wider Adamstown and Lucan area, including pressure on existing amenities such as Airlie Park and the non-delivery to date of

considered collectively with ongoing SDZ development, may result in environmental effects greater than those assessed on an individual site basis. Concerns are expressed regarding traffic-related emissions, loss of green space and pressure on sensitive environmental receptors. *Appropriate Assessment (AA)* Some submissions raise concerns regarding ecological sensitivities and downstream impacts on designated sites along the River Liffey corridor. While specific European sites are not always named, these submissions argue that potential impacts on habitats and water quality should be carefully assessed through Appropriate Assessment, particularly given the cumulative nature of development in the catchment. Submissions state that assurances are required that residential development at Tubber Lane North would not result in adverse effects on protected habitats either alone or in combination with other plans and project	Tobermaclugg Park, which is identified as a strategic open space within the Adamstown SDZ Planning Scheme (as amended). The Planning Authority wishes to clarify that the Adamstown Strategic Development Zone (SDZ) Planning Scheme provides for a comprehensive and hierarchical network of public open spaces designed to serve the needs of the existing and future population. To date, the SDZ has delivered two major parks and open spaces, including Airlie Park and Tandy's Lane Park, both of which are fully completed and in public use. In addition to this, Central Boulevard Park is currently under construction, further expanding the open space provision available to residents. The Planning Scheme also identifies Tobermaclugg Park as a key strategic park forming part of the later Phases 9 and 10 of the SDZ. This park is intended to provide a significant area of recreational and amenity open space forming an integral component of the overall green infrastructure network of Adamstown. In the context of Tubber Lane North, the Planning Authority considers that concerns regarding timing and enforceability of open space delivery are appropriately addressed through the associated Specific Local Objective (CS7 SLO5). The SLO requires the preparation of a masterplan and the undertaking of both a social infrastructure audit (as per CS7 SLO5 4 C) and a parks and open space audit, which must assess existing provision, current deficits and future requirements prior to development coming forward. These audits are intended to ensure that development is informed by, and responsive to, the needs of both existing and future residents.

	Crucially, the SLO explicitly links the delivery of development at Tubber Lane North to the delivery of Tobermaclugg Park as follows: *'Development may not commence until Tobermaclugg Park, a phasing requirement of the Adamstown SDZ Planning Scheme, has commenced construction.'* This ensures that the site cannot be developed in isolation or in advance of this strategic open space. The Planning Authority considers that this linkage provides a clear policy safeguard to ensure that the park is commenced in advance of residential development on the subject lands. In addition, it is noted that open space provision will also form part of the Tubber Lane North landholding itself, ensuring that future residents have access to local-level amenity space while also benefitting from the wider network of neighbourhood and strategic parks within the SDZ. It is important to note the land in question has environmental sensitivities, as raised by the NPWS comments on the site. This has been reflected in a revised SLO, as outlined below. Notwithstanding this, the existing policy approaches apply, notably the CDP objectives and site requirements for open space provision. Submissions suggesting that the lands at Tubber Lane North be retained wholly or partly as open space are noted. However, the Planning Authority considers that, when assessed in the context of the existing and forthcoming park provision within Adamstown, including Tobermaclugg Park and the Central Boulevard Park, the proposed zoning represents a balanced approach that provides for housing in a sustainable location while ensuring that meaningful and accessible open space is delivered in a timely manner.

	In summary, while concerns regarding current recreational pressure are acknowledged, the Planning Authority is satisfied that the Adamstown SDZ Planning Scheme, together with the Tubber Lane North SLO, provides a robust, enforceable and plan-led framework for the delivery of parks and open space in tandem with residential development. The proposed approach ensures that future development will be supported by both local and strategic open space provision and that existing and future communities will benefit from a high-quality and accessible green infrastructure network in the immediate vicinity. This is in addition to significant recreational amenity within Lucan at Griffeen Valley Park (a regional park), including the recently completed swimming pool. Notwithstanding the above, it is considered appropriate to amend the SLO to reflect the future needs and environmental sensitivities of perspective occupiers, including an appropriate balance of passive and active amenity and public open space. **CE Recommendation** Amend wording of the SLO no. CS7 SLO5 to reflect requirement to balance passive and active amenity and public open space needs of perspective users: ***f. Have regard to environmental sensitivities and provide an appropriate balance of passive and active amenity in the public open space; and*** **Biodiversity, Environment, Green Infrastructure** Submissions have highlighted the importance of existing hedgerows, wildlife habitats and the relationship of the site to the River Liffey.

	The Planning Authority wishes to clarify that the proposed residential zoning is underpinned by a robust Specific Local Objective (SLO) which is expressly designed to ensure that green infrastructure, biodiversity assets and environmental sensitivities (Note the NPWS submission) are appropriately protected and enhanced through a plan-led approach, consistent with the objectives of the County Development Plan. CS7 SLO5 requires in point 4: 4. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: • Retention and enhancement of the north–south historic hedgerow, as identified on 1st Edition Ordnance Survey mapping, unless its removal is demonstrably required to accommodate essential site integration or connectivity objectives; • The preparation of a Public Open Space Audit to inform the location, extent and function of public open space and its integration with the wider green infrastructure network; and • The undertaking of a Social Infrastructure Audit, ensuring that environmental and amenity considerations are aligned with the needs of current and future communities. The Planning Authority notes submissions expressing concern that development could result in the loss or fragmentation of hedgerows

	and green corridors. In this regard, the SLO explicitly prioritises the safeguarding and enhancement of existing green infrastructure features, ensuring that they form a core structuring element of any future development layouts. The SLO was also updated following the initial SEA review to ensure adequate protections were included in the SLO for key biodiversity features. This approach reflects national and regional planning policy objectives relating to biodiversity conservation, climate resilience and the multi-functional role of green infrastructure in supporting ecological connectivity and quality of life. Public open space and green infrastructure will be delivered as part of the Tubber Lane North lands, providing local amenity while strengthening connectivity to the wider Adamstown SDZ open space network, including Tobermaclugg Park, and contributing to a coherent and integrated green infrastructure system. The Planning Authority acknowledges concerns raised, including those from DHLGH (NPWS) and the Inland Fisheries, regarding potential environmental impacts such as noise and disturbance to sensitivities in the area. These issues will be addressed through the SLO-led masterplanning process and subsequent planning applications, with full compliance required with environmental standards, CDP policies and best practice guidance. It is therefore considered appropriate to amend the SLO to explicitly reflect key environmental sensitivities, ensuring that ecological considerations are embedded at the earliest stage and integrated into the design and delivery of future development. **Climate Action, Environment and Heritage and Archaeology** The Chief Executive notes the matters raised in submissions relating to climate action, environmental quality and heritage in the context of Tubber Lane North. The Planning Authority considers that these issues are appropriately addressed through the wider policy framework of the

	South Dublin County Development Plan 2022–2028, the Adamstown SDZ Planning Scheme and the Specific Local Objective (SLO) applicable to the site, which together promote compact, masterplan-led development integrated with services, green infrastructure and sustainable mobility. Climate action objectives, including reduced emissions, energy efficiency and climate resilience, will be assessed at planning application stage in accordance with adopted policy and standards. Environmental concerns relating to air quality, noise and cumulative impacts will similarly be subject to detailed assessment and mitigation. **Flood Risk / Flood Zone / SFRA /Surface Water and Riparian Corridor** The Chief Executive notes the concerns raised in submissions regarding flood risk, surface water management and the implications of Flood Zones A and B, including reference to the Strategic Flood Risk Assessment (SFRA). Submissions highlighting the need for a precautionary approach and for robust, site-specific flood risk assessment are acknowledged. In respect of the submissions received, the Planning Authority confirms that the site (Tubber Lane North) is situated slightly within Flood Zones A and B, and within the HEFS 0.1% and 1% AEP extents. A tributary of the River Liffey runs along the northern boundary of the site. In direct response to this flood risk, the proposed variation divides the site into two sections: the main portion is proposed for residential use (outside the flood zone), and the flood-affected portion is designated as open space, pulled back from the riparian corridor in accordance with GI3 Objective 3. The submitters' flood concerns are therefore consistent with the SFRA findings, which confirm that part of the site overlaps with the mapped flood extents. The flood-affected portion

	has been excluded from residential zoning as a direct result of the SFRA assessment. A site-specific FRA will be required at planning application stage in accordance with Section 4.3 of the SFRA. The Planning Authority concludes that the proposed zoning of lands at Tubber Lane North (Variation Site No. 4) does not override national flood risk management policy. Any future development will be required to comply with the Planning System and Flood Risk Management Guidelines (as amended). The Planning Authority notes submissions identifying areas of the site as low-lying and susceptible to surface water accumulation during periods of heavy rainfall. These issues will be required to be addressed through a site-specific Flood Risk Assessment (FRA) and Surface Water Management. The Council has adopted Sustainable Drainage Systems (SuDS) Guidelines, which are to be utilised in the design of developments, green spaces and public realm areas. These guidelines support the use of integrated green infrastructure, including permeable surfaces, attenuation features and nature-based solutions, to manage runoff, enhance water quality and increase climate resilience. The application of SuDS will be required to ensure that surface water runoff is appropriately controlled and that drainage solutions are demonstrably effective. A combination of development-specific mitigation measures, SuDS-based solutions and strategically designed open space will be required to deliver a comprehensive and resilient approach to flood risk management, informed by the County Development Plan and the site-specific masterplan. While concerns regarding flood risk and surface water management are acknowledged, the Planning Authority is satisfied that the existing policy framework, in conjunction with the

	Strategic Flood Risk Assessment, national flood risk guidelines and SDCC SuDS guidance (including Policy GI14), provides a clear and enforceable framework to ensure risks are fully assessed and mitigated. The incorporation of buffers to riparian corridors further strengthens this approach, ensuring that development cannot proceed without demonstrating that flood risks are appropriately addressed, protecting residents, safeguarding amenity, and avoiding residual impacts. Accordingly, the proposed zoning at Tubber Lane North is considered consistent with flood-risk-led planning principles, ensuring development is subject to rigorous assessment and best practice mitigation. In addition to the above, the issue of riparian corridors were also raised. Riparian Corridors are the focal point for much of the world's freshwater. These areas are seen to be important in terms of biogeochemical processing and subsequent ecosystem service provision. They have a proven role in controlling the movement and processing of waterborne pollutants. The relationship between riparian areas and nutrient processing is widely known, by acting as buffers between upland areas and open water, they help treat pollutants. Riparian vegetation acts with flow, sediment and topography to influence channel form, instream habitat, nutrient dynamics, temperature and flow patterns. These are protected trough the County Development Plan. The Planning Authority considers that the proposed (amended) SLO and masterplan, are sufficient to secure the protection of the riparian corridor at Tubber Lane. The CDP also ensure that the features are protected in the assessment of any development proposals, ensuring full compliance with Objective G13 (Riparian Corridors) in relation to

	any watercourses on or adjoining the site, ensuring the protection, enhancement and appropriate buffering of riparian habitats and waterways. **Water and Wastewater / Utilities** A number of submissions queried the capacity of water supply, wastewater and wider utility infrastructure to support additional residential development at Tubber Lane North with some referencing. historic experiences where infrastructure delivery lagged behind housing development. In relation to Tubber Lane North, Uisce Éireann in their submission to the Variation indicated: *Water Network: connect to Adamstown SDZ. Upgrades Required.* *Sewer Network: Upgrades required downstream of Tobermaclugg Pumping station. Need further studies and a masterplan.* CS7 SLO5 requires that a water and wastewater infrastructure masterplan be submitted to the Planning Authority as part of any planning application and be agreed with UÉ. This requirement provides a clear and enforceable safeguard ensuring that development proposed on the subject lands will be contingent on confirmation of capacity or the delivery of necessary upgrades. The Planning Authority acknowledges concerns regarding cumulative impacts arising from multiple rezonings and infrastructure resilience. The requirement for an infrastructure masterplan ensures that cumulative development is considered in a coordinated manner, avoiding piecemeal servicing approaches and requiring clear evidence that necessary infrastructure is in place or can be delivered in a timely

	manner. Issues relating to climate resilience and population growth will be addressed at planning application stage through compliance with current design standards, ensuring that development is supported by infrastructure that is sustainable, robust and adaptable. In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place. A submission was received from the Electricity Supply Board (ESB) with regard the overall variation, having no site specific objections to the proposed variation. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals. In summary, while concerns regarding water, wastewater and utility capacity are acknowledged, the Planning Authority is satisfied that the Specific Local Objective for Tubber Lane North provides clear, enforceable mechanisms to ensure that infrastructure planning is undertaken in advance of development and in consultation with the relevant service providers. Accordingly, the proposed zoning of the lands does not undermine infrastructure-led planning but is supported by a plan-led approach fully aligned with national and local policy. Any future servicing concerns by infrastructure providers can be submitted

	during public consultation on planning applications and considered as part of the application assessment. **Aviation Safeguarding** A submission made on behalf of Weston Airport has been carefully considered, with particular regard to the safeguarding of aviation operations, public safety, and the operational and technical requirements of civil aerodromes within and adjoining South Dublin County. The Council supports aviation safeguarding as set out within Chapter 11.8 of the South Dublin County Development Plan 2022–2028, which provides a comprehensive framework for development controls in the vicinity of Dublin Airport, Casement Aerodrome and Weston Airport, having regard to international, European and national aviation standards. These include the safeguarding requirements established under ICAO Annex 14, the Irish Aviation Authority (IAA) Guidance on Aerodrome Safeguarding, and the EASA Certification Specifications for Aerodromes. The Council recognises the role of Weston Airport as a key aviation facility, including its use for pilot training and Irish Coast Guard Search and Rescue operations, and notes ongoing developments such as RNAV approach procedures. The Council reaffirms its commitment to Policy IE10 and associated Development Plan objectives, which ensure that development in the vicinity of the airport is appropriately managed. In addition, the continued application of Public Safety Zones (PSZs) under Policy IE14 is emphasised, restricting development in areas close to runway thresholds in the interests of public safety. Overall, the Council is satisfied that the existing Development Plan framework provides adequate safeguards to protect airport operations and

	residential amenity, and supports the continued safeguarding of Weston Airport's function. **Environmental Evaluation** The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Tubber Lane North. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. It is important to note that there are a number of related projects, such as, BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the

	plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process. Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **Conclusion**

	South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The subject lands at the Tubber Lane are appropriate lands to meet these objectives. The Planning Authority considers that the proposed zoning and associated SLO provide an appropriate, proportionate and policy-aligned framework for the development of these lands, reflecting their scale, location and relationship to the established Adamstown SDZ. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation Amend wording of the SLO no. CS7 SLO5: Development on RES-N zoned lands north of Tubber Lane shall comply with the following: 1. *Development may not commence until Dart+ Southwest* ***or the commencement of an equivalent rail service to the Dart*** *has commenced construction* ***or operation, as may be relevant.*** 2. *Development may not commence until Tobermaclugg Park, a phasing requirement of the Adamstown SDZ Planning Scheme, has commenced construction.* 3. *An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.*	

4. *A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia:*

a. Retention and enhancement of the north-south hedgerow as recorded on 1st Edition OS maps, unless required for wider movement needs,

b. Ensure compliance with G13 (Riparian Corridors) in relation to any watercourses on site,

c. A Social Infrastructure Audit and provision within development proposals to address any needs identified,

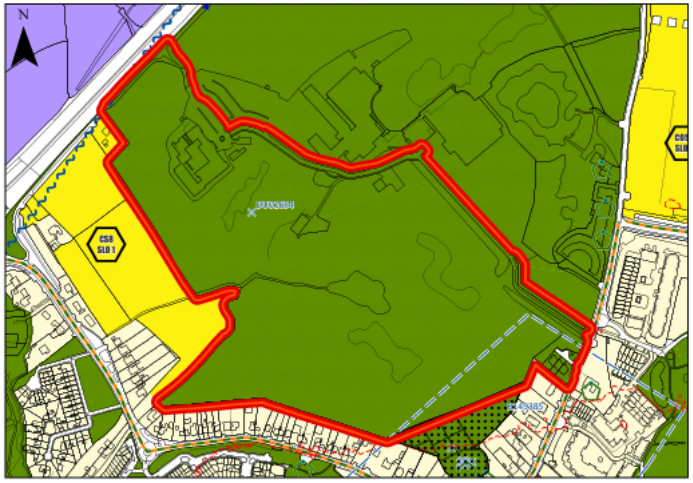
d. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, ***informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as defined in the Sustainable Residential Development and Compact Settlement Guidelines;*** ~~*an*~~

e. A Public Open Space Audit to inform proposals for public open space and recreational facilities;

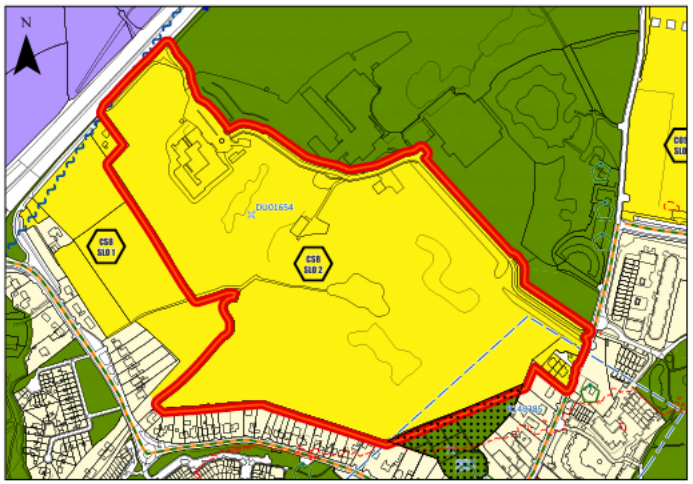
f. Have regard to environmental sensitivities and provide an appropriate balance of passive and active amenity in the public open space; and

g. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.

AMENDMENT NO. 5 - CITYWEST



Existing



Proposed

Submission No.

SD-C401-CDP25-7 – Antonia McDonnell

SD-C401-CDP25-29 – Tracy Walsh

SD-C401-CDP25-63 – George White

SD-C401-CDP25-199 – Denise Carney

SD-C401-CDP25-205 – Amanda Higgins

SD-C401-CDP25-207 – Fiona Smyth

SD-C401-CDP25-209 – Rachel Tobin

SD-C401-CDP25-212 – Jennifer Egan Egan

SD-C401-CDP25-213 – Jennifer Blighe

SD-C401-CDP25-217 – Claire Cagney Cagney

SD-C401-CDP25-218 – Paul Southern

SD-C401-CDP25-220 – Shay Moriarty

SD-C401-CDP25-221 – Emmalene Kennedy Kennedy	SD-C401-CDP25-222 – Nischal Ramesh	SD-C401-CDP25-223 – Jakub Madzelewski
SD-C401-CDP25-225 – A Malone	SD-C401-CDP25-226 – Darragh Robinson	SD-C401-CDP25-231 – Anne Sullivan
SD-C401-CDP25-235 – Karoline Sheehan Sheehan	SD-C401-CDP25-250 – Ciarán Butler	SD-C401-CDP25-269 – Jackie Prendergast
SD-C401-CDP25-276 – Malgorzata Lorek Lorek	SD-C401-CDP25-281 – Pauline Thornton Thornton	SD-C401-CDP25-286 – Joe Lennon
SD-C401-CDP25-315 – Meaghan Kelly	SD-C401-CDP25-317 – Yvette Robinson Robinson	SD-C401-CDP25-323 – Joanne Fitzpatrick
SD-C401-CDP25-344 – Ivona Ní Luain	SD-C401-CDP25-375 – Sylvia Linehan	SD-C401-CDP25-383 – Elena Boitan
SD-C401-CDP25-392 – Kieran Kissane	SD-C401-CDP25-402 – Magdalena Zajac	SD-C401-CDP25-408 – Ali Nezam
SD-C401-CDP25-410 – Joanna Pietka	SD-C401-CDP25-432 – Aishling Fagan	SD-C401-CDP25-439 – Fabio Cinelli
SD-C401-CDP25-440 – Lisa Lowry	SD-C401-CDP25-442 – Haneet Bansal	SD-C401-CDP25-449 – Nicola Hynes
SD-C401-CDP25-473 – Ruth Laverty	SD-C401-CDP25-475 – Karthick Thimma	SD-C401-CDP25-479 – Martin Dunne
SD-C401-CDP25-485 – colin hickey	SD-C401-CDP25-486 – Thomas Mansfield	SD-C401-CDP25-487 – Steve Toner
SD-C401-CDP25-488 – Claire Lako	SD-C401-CDP25-490 – Edmund Harman Edmund Harman	SD-C401-CDP25-494 – Karolina Kajak Pienkowska

SD-C401-CDP25-495 – Ina Mikeliunaite	SD-C401-CDP25-497 – Nina Payanina	SD-C401-CDP25-503 – Anastazja Staszak
SD-C401-CDP25-505 – Jeannette Manifold	SD-C401-CDP25-508 – Roisin Quinn	SD-C401-CDP25-510 – Siobhan Jones
SD-C401-CDP25-519 – Kotryna Kurseviciute	SD-C401-CDP25-524 – James collins	SD-C401-CDP25-533 – Darren Kennedy
SD-C401-CDP25-535 – Claire Purcell	SD-C401-CDP25-544 – Felipe Bassoli	SD-C401-CDP25-548 – Ken Finn
SD-C401-CDP25-560 – Siobhan Hennessy	SD-C401-CDP25-567 – Gena Mc Cafferty	SD-C401-CDP25-575 – Adrian Kopec
SD-C401-CDP25-577 – Dr. Charlotte C Pilla Power	SD-C401-CDP25-582 – Barry Hughes	SD-C401-CDP25-587 – Gillian Sullivan
SD-C401-CDP25-592 – Malgorzata Kennedy	SD-C401-CDP25-595 – Mairead Foyle	SD-C401-CDP25-604 – Steve Walsh
SD-C401-CDP25-621 – Bryan Long	SD-C401-CDP25-622 – FORAN AISLING AISLING	SD-C401-CDP25-629 – Sarah Von Steiger
SD-C401-CDP25-638 – Seán Dungan	SD-C401-CDP25-640 – Amy Kane	SD-C401-CDP25-643 – Niamh Dungan
SD-C401-CDP25-645 – David Dungan	SD-C401-CDP25-646 – Lorraine Finn	SD-C401-CDP25-647 – Mairead Barrett
SD-C401-CDP25-650 – Mark Rice	SD-C401-CDP25-651 – Teresa Moyles	SD-C401-CDP25-667 – Sanijan Mathew
SD-C401-CDP25-691 – Susan Murphy	SD-C401-CDP25-729 – Gavin Smyth	SD-C401-CDP25-731 – Therese Smyth

SD-C401-CDP25-733 – Paul Nolan	SD-C401-CDP25-734 – Sean Smyth	SD-C401-CDP25-737 – Annette McDermott McDermott
SD-C401-CDP25-744 – Paul Crone	SD-C401-CDP25-760 – Howard Robinson	SD-C401-CDP25-766 – Anne Robinson
SD-C401-CDP25-769 – Peter Murray	SD-C401-CDP25-770 – ALEKSANDR BORTNIK	SD-C401-CDP25-771 – Nicola Fitzpatrick
SD-C401-CDP25-781 – Amy Lucey Lucey	SD-C401-CDP25-782 – G Manning	SD-C401-CDP25-784 – Denice Mellon Mellon
SD-C401-CDP25-789 – Julieanne McGeown McGeown	SD-C401-CDP25-809 – Cllr Trevor Gilligan PC	SD-C401-CDP25-819 – Janice Holohan Holohan
SD-C401-CDP25-830 – Kevin Lyons	SD-C401-CDP25-832 – Marie Smyth	SD-C401-CDP25-842 – Hans Mattisson
SD-C401-CDP25-845 – Gaurav Agrawal	SD-C401-CDP25-856 – Kevin Kelly	SD-C401-CDP25-858 – Juliet Henshaw
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-886 – Jody Phillips	SD-C401-CDP25-888 – Patricia Farrell
SD-C401-CDP25-889 – Alison Fogarty	SD-C401-CDP25-892 – Sharon Murray	SD-C401-CDP25-898 – Declan. Costello
SD-C401-CDP25-927 – Citywest Community Council	SD-C401-CDP25-950 – Brian O'Brien-Olinger	SD-C401-CDP25-980 – Damien Byrne
SD-C401-CDP25-992 – S W	SD-C401-CDP25-1013 – Ruzain Zainal	SD-C401-CDP25-1041 – Transport Infrastructure Ireland
SD-C401-CDP25-1056 – Office of Public Works	SD-C401-CDP25-1069 – Linda Parsons	SD-C401-CDP25-1112 – Ray Ashmore

SD-C401-CDP25-1131 – Paul Carr	SD-C401-CDP25-1139 – Aidan Nolan	SD-C401-CDP25-1200 – Katrina Russell
SD-C401-CDP25-1221 – Gary Phillips	SD-C401-CDP25-1224 – Ashling Phillips	SD-C401-CDP25-1227 – Patrick Carney
SD-C401-CDP25-1239 – Cllr. Helen Farrell	SD-C401-CDP25-1249 – Ambrose Noone	SD-C401-CDP25-1251 – Louise Clancy
SD-C401-CDP25-1252 – David O'Connor	SD-C401-CDP25-1256 – MARIAN BEIRNE	SD-C401-CDP25-1280 – Noel Mc Dermott
SD-C401-CDP25-1307 – Lynn Tierney	SD-C401-CDP25-1310 – John O'Leary Secretary BCM Residents Association SDCPPN-0544	SD-C401-CDP25-1326 – Cormac Branagan
SD-C401-CDP25-1327 – Denis Casey	SD-C401-CDP25-1336 – Clodagh Branagan	SD-C401-CDP25-1344 – Simon Powell
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1393 – Anne O Byrne	SD-C401-CDP25-1397 – Brian Fogarty
SD-C401-CDP25-1400 – John O Byrne	SD-C401-CDP25-1409 – Judit Csizmadia-Gossler	SD-C401-CDP25-1434 – Anita Kelly
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1451 – Saggart Village Residents' Association	SD-C401-CDP25-1455 – Burnella Cottage Ltd
SD-C401-CDP25-1469 – Mary Lawless	SD-C401-CDP25-1473 – Sandra Malone Malone	SD-C401-CDP25-1480 – Rathcoole Tidy Towns

SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1515 – Cidem Karanfil	SD-C401-CDP25-1531 – John Lahart TD
SD-C401-CDP25-1533 – Saggart Guardians	SD-C401-CDP25-1534 – Anthony O'Grady	SD-C401-CDP25-1542 – Sean Ward
SD-C401-CDP25-1559 – Cllr Linda de Courcy	SD-C401-CDP25-1562 – Tanja Swan	SD-C401-CDP25-1566 – Lucas Swan
SD-C401-CDP25-1572 – Mark Swan	SD-C401-CDP25-1576 – Alexandria Swan	SD-C401-CDP25-1604 – Javier Romero
SD-C401-CDP25-1616 – Caoimhe Hogarty	SD-C401-CDP25-1626 – Ana Campo	SD-C401-CDP25-1648 – Nicola Maguire
SD-C401-CDP25-1666 – Shane Moynihan TD	SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1678 – Eoghan Nihill
SD-C401-CDP25-1695 – Louise Quinn	SD-C401-CDP25-1701 – Piotr Zajac	SD-C401-CDP25-1702 – Sana Khan
SD-C401-CDP25-1716 – Hazel Dowling Shannon	SD-C401-CDP25-1721 – Caroline Lawlor	SD-C401-CDP25-1725 – Department of Education and Youth
SD-C401-CDP25-1748 – Diane Begley	SD-C401-CDP25-1750 – Jonathan Mooney	SD-C401-CDP25-1755 – Duane Byrne
SD-C401-CDP25-1773 – Stephen Nugent	SD-C401-CDP25-1803 – Fidelma McCall	

Summary	CE Response
Zoning	**Variation Proposal**

Submissions generally objected to proposed Amendment no. 5 at Citywest. A Saggart Village Residents' Association (SVRA) Local Community Survey (January 2026) with 786 respondents is provided, indicating 96% opposing the Citywest rezoning. In addition, results of an online public poll carried out by a local councillor were submitted in respect of a range of sites proposed to be rezoned as part of Variation No. 2. The results shown in the submission for the proposed rezoning at Citywest indicated 0 in favour, 6 against. A number of submissions state that the land should instead: - Remain zoned open space - Be rezoned high amenity - Be turned into a public park - Provide a modern conference or hospitality facility that supports tourism, business events and employment - Provide a major multi-sport and recreation campus including soccer pitches, a cricket ground, athletics facilities, cycling routes and indoor sports infrastructure - Provide a multi-purpose sports and community facility (SVRA survey shows that 82% of local residents identified the development of a multi-purpose sports and	Given the need to rezone more land in the county to accommodate the county's housing growth targets, as set out in the 'Variation Context and Process' heading below, Amendment no. 5 proposes a zoning change from Open Space ('OS') to New Residential ('RES-N') to lands (c. 22ha) on the former golf course of the Citywest Hotel. Alongside this, a new Specific Local Objective (SLO) is proposed under Policy CS8 in Chapter 2 of the County Development Plan, as follows: *CS8 SLO2:* *Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia:* *1. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species,* *2. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and* *3. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane.* **Variation Context and Process** For South Dublin County Council, the revised annual housing target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery.

community facility as needed and a more appropriate use of the lands) - Be used as a golf course again A submission raises concerns at the reliability of the evidence base being used to justify the Variation. It identifies an apparent conflict between figures described as evidence sources in the Settlement Capacity Audit (7,931 completions) and the Housing Supply Monitor (9,075 completions). A submission asks why further greenfield rezoning is being proposed before existing zoned capacity has been activated. It states that a plan-led approach instead of a rezoning first approach is needed. It is suggested that the real issue is the gap between theoretical capacity and actual deliverability. **Overdevelopment** The change in rezoning from 'OS' to 'RES-N' is not appropriate as the Citywest / Saggart area lacks adequate infrastructure, amenities, green space and services. The proposal in this Variation will only make this situation worse and risks overpopulating the area. A SVRA survey indicates that 92% of survey responses believe the Citywest area is overdeveloped. The IPAS accommodation (approximately 2,000-2,500 people) has led to rapid population growth in the area and substantial permitted development in the area remains unbuilt, including at Boherboy. Residents feel their village	The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process, Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613

has been disrupted and destabilised by rapid change over the last few years. While the need for housing is acknowledged, a large volume of submissions emphasise that there is a need for infrastructure and services to be put in place first before any new developments. It is stated that national and regional policy do not require local authorities to ignore infrastructure limits, environmental law or the need for proper sequencing. A submission states that a robust planning process must account for real demand on the ground and rezoning should be tied to the delivery of real, accessible and properly designed facilities and infrastructure. **Community and Social Facilities** A large number of submissions state that community and social infrastructure have not been fully assessed and that housing growth has outpaced the delivery of essential services. Submissions highlight the following issues: - Local schools, crèches, GPs and dentists are oversubscribed and there is insufficient capacity to support further population growth. - The area is considered underserved in terms of primary care facilities and there is no confirmed HSE-funded local expansion to absorb a population increase. - A lack of community centres and recreational, sporting and youth facilities, pharmacies, post offices and businesses.	units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has identified lands which have been carefully evaluated through a criteria-based approach to best meet the housing shortfall for 2028 with built-in additional capacity. The subject lands have been identified as suitable and necessary to deliver on the Revised National Planning Framework housing targets. **Zoning** It is noted that a large volume of submissions object to the Amendment no. 5. Results from a survey carried out by a local group also show a high percentage of objections relating to the rezoning of the site. Where issues are raised as part of submissions made to this Variation, they are responded to within the relevant sections of the CE Response. An independently conducted online poll was recorded by way of a submission indicating the number of respondents who were for and against the rezoning, there being 6 No and 0 Yes. However, in relation to the online poll it is not known if any of the respondents made submissions through the Variation process. As such, the CE cannot respond further on the results or the reasons for them. The potential for the land to accommodate a range of uses is noted. As mentioned above, the lands are subject to a proposed SLO which states that any development on the site *'shall be in accordance with a*

- No swimming pool, cinema, library or multi-purpose sports facility and no adequate meeting places or shared civic spaces, bars or restaurants for residents to socialise. - Children and teenagers have nowhere to socialise which contributes to antisocial behaviour: A survey conducted by SVRA indicates that concern about safety and policing is one of the strongest issues raised by residents at 79%. There is no Garda station serving the area, raising concerns about community safety and response times. - The permanent loss of the hotel and conference centre has resulted in a loss of recreational and community resource for local residents and negatively impacts quality of life. The closure of the hotel also results in economic loss regarding tourism and employment opportunities. - The Fortunestown LAP community facilities remain outstanding, intensifying the amenity deficit. Past permissions envisaged a sports pavilion, pitches, tennis, playground, jogging track and landscaped parkland adjoining Citywest Shopping Centre. - Housing developers are opting to pay a "contribution in lieu" of public open space when submitting their applications. These contributions are to be used for the provision of amenities and community facilities within the County; however, communities still	*masterplan for the lands'.* This masterplan will be informed by an ecological impact assessment and a transport and traffic assessment and will include the provision for a direct active travel link through the subject lands between Mill Road and Garter Lane. Following consideration of submissions, it is recommended that the provision of a community centre / sports hall on the lands is included as an additional requirement under CS8 SLO2 within the masterplan. This will require the developer to ensure that sufficient space is made available to accommodate a building of approximately 1500sq m within the lands to accommodate same as part of the requirement for the masterplan to address as follows: *Provision for a community centre / sports hall (c. 1500sqm).* In relation to comments on the figures used, the Settlement Capacity Audit uses the publicly available South Dublin County Council Housing Supply Monitor to establish the county's current dwellings completion status. At the point in time of the SCA (Q3 2025), South Dublin County Council's Housing Supply Monitor indicated that 7,931 had been completed since the adoption of the County Development Plan in 2022. It is noted that that an additional one unit has subsequently been added to that specific period (Q3 2022 to Q3 2025). Nonetheless, this does not impact the integrity of the Settlement Capacity Audit. The 9,075 units completed, as quoted by the submitter, includes an additional quarter (Q4 2025). As such, there is no discrepancy between the Settlement Capacity Audit and the Housing Supply Monitor. The Planning Authority acknowledges the concerns in relation to land activation and deliverability; however, it is emphasised that the identification of lands for rezoning is not based on a 'rezoning first'

campaign for facilities that they were promised 25-30 years ago. It is stated that rezoning does not comply with: - County Development Plan Objective SS1 – Sustainable Settlements. - An Bord Pleanála Inspector Reports for nearby developments reference potential pressures on schools and community infrastructure associated with population growth. - The Planning and Development Act 2000 requests planning authorities to consider the capacity of public services when assessing development proposals. **Schools** A number of submissions state that schools are already under pressure and further large-scale development would exacerbate competition for school places and after school services. Zoning in advance of confirmed school delivery would undermine compact growth, increase car dependency and conflict with safe routes to school aims. A submission states that landowner objection to the proposed Coláiste Pobail Fóla planning permission caused years of delay leaving children attending school in substandard temporary accommodation. A submission requests that a SLO be added to provide for a new Educate Together National School	approach, but on a rigorous, evidence-based assessment suitability informed by national policy, infrastructure capacity, and planning policy objectives. In this regard, the proposed Variation responds to updated requirements under the revised National Planning Framework (NPF) and associated Section 28 Guidelines, which require planning authorities to ensure that sufficient, deliverable land is available to meet increased housing targets. A comprehensive capacity audit was undertaken to support this process, considering site constraints, infrastructure availability, accessibility to services and public transport, and the ability of lands to support compact growth and transport-oriented development. Engagement with key stakeholders, including the National Transport Authority, Uisce Éireann and the Department of Education and Youth, informed this assessment. The lands identified represent some of the most suitable, accessible and serviceable locations within the County, particularly where they can integrate with the established urban framework and benefit from existing and planned infrastructure investment. As such, the identification of lands reflects planning suitability and deliverability, rather than a 'rezoning first' approach. It is also important to point out that all existing policies and objectives in the County Development Plan still stand which seek to promote proper planning and development. **Overdevelopment** The Council acknowledges the concerns raised in submissions regarding overdevelopment, including a survey result showing a high percentage of respondents saying that the Citywest area is overdeveloped. The Council also notes submissions concerns regarding population growth associated with the IPAS accommodation and

(ETNS) site on the rezoned lands. This would replace the ETNS school that was previously located adjacent to the site on Fortunestown Lane. Without such provision, parents are currently required to transport children to schools in nearby villages such as Newcastle and Rathcoole. The Department of Education and Youth notes the increase in units which could require a significant increase in primary school place demand, but it is currently expected that this extra requirement could be accommodated by the planned expansion of existing facilities. In terms of post primary school provision, the Department indicates that the projected growth figures could again, see a significant increase in demand, which would potentially be accommodated within existing post primary schools and current capital projects. A submission states that rezoning should be deferred until the Department of Education (sic) confirms site-specific education provision, funding and timelines, with conditions for phased occupation tied to delivery. A specific SLO is requested in relation to this. **Transport Infrastructure** A large volume of submissions state that transport infrastructure is inadequate for the existing	further growth from unbuilt permitted development, including at Boherboy. However, it is important to understand the Citywest settlement context, and its relationship to the lands associated with the Fortunestown Local Area Plan, now expired but with key objectives in relation to delivery of infrastructure included in the County Development Plan. The Citywest area is identified as within the 'Dublin City and Suburbs' settlement typology in the Regional Spatial and Economic Strategy (RSES). The Dublin City and Suburbs settlement is the top-level settlement for the region and is described as an 'international business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment'. For South Dublin County, Dublin City and Suburbs is a regionally identified settlement within the County. In addition, Saggart, Rathcoole and Newcastle are identified within the County Development Plan as self-sustaining growth towns. All of South Dublin County is within the Dublin Metropolitan Area Strategic Plan (MASP) which identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. Citywest is on the South West Corridor which is currently supported by the LUAS Red Line and will facilitate the DART expansion/Kildare Line. The site is within walking distance (500m) of the Red Luas Line Fortunestown Stop, which provides a high frequency public transport service. It is noted that the 'Dublin City and Suburbs' settlement have expanded in recent decades; there has been a 19.5% change in growth between the years 2006 and 2022.

population, with capacity and service levels failing to meet current demand, contributing to car dependency. It is stated that the council's justification based on the "proximity to high-capacity and high-frequency public transport" is inaccurate as trams from Saggart are full from 7am, leaving people unable to board. It is also misleading to suggest that this transport corridor can absorb more development. Submissions state that the road network is already operating at or beyond capacity and cannot support further development. This includes the village crossroads, N7, Fortunestown Lane, Garters Lane and Citywest Road. It is submitted that the daily commute has increased substantially. Rezoning will result in further delays, rat-running through residential streets, road safety risks and air/noise impacts. A submission states the delivery of additional relief roads or additional capacity is required around the area. It is stated that no credible or independent cumulative traffic assessment has been undertaken, while another submission states the Council should undertake an Area Based Transport Assessment and secure up-front delivery of public transport and active travel infrastructure prior to zoning. A submission refers to An Bord Pleanála Inspector's Report relating to the Kelland Homes Ltd proposal at Boherboy which highlights transport capacity	The proposed lands, while being associated with the Citywest hotel and complex, are in planning terms within the Saggart settlement in accordance with definitions used in the revised NPF as defined by the CSO Urban Areas, national statistical boundaries. The total capacity of undeveloped existing zoned lands in Saggart identified in the Settlement Capacity Audit and reflected in Table 9 of the Variation (Written Statement) is 393 units, of which 294 units are identified as being deliverable up to 2028 (Table 9.2). Table 10 shows the estimated capacity of additional zoned lands identified in the proposed Variation of 625 units. Therefore, the Core Strategy in Table 11 indicates a total of 919 potential capacity in the wider Saggart area. Acknowledging this growth, Variation No. 2 sets out the requirement for a masterplan which includes the need for a traffic and transport assessment and an ecological assessment to ensure sustainable development. In addition, further requirements as part of the masterplan are being recommended by the Chief Executive as set out in this report. The Planning Authority is satisfied that the proposed rezoning of Citywest, alongside the additional recommendations, represents a strategic, plan-led response to national housing requirements, grounded in compact growth and TOD principles. When read in conjunction with the Section 28 Guidelines, the Development Plan policies, and the Specific Local Objective, the rezoning provides a controlled framework that addresses overdevelopment concerns while supporting sustainable development in an accessible location. **Community and Social Facilities** The Planning Authority acknowledges the concerns raised in submissions regarding pressure on community and social facilities in

issues and cumulative impact of developments on the local road network. Another submission notes that a bypass that was part of a planning agreement in Millrace is "forgotten" about. A submission argues that the proposed rezoning fails to comply with the Planning and Development Act 2000 by exceeding the capacity of existing infrastructure. It would also be contrary to: - National transport strategy i.e. Moving Together: A Strategic Approach to Improving the Efficiency of Ireland's Transport System which seeks to promote sustainable transport and a modal shift toward public transport and active travel which requires adequate capacity and accessibility within the transport network. - NPF Objective 27 relating to sustainable transport. - Development Plan transport policies in relation to need for sustainable and safe transport infrastructure. - Development Plan policies on cumulative impact (e.g. Objective TI1 - Transport Integration). TII has submitted that the N/M7 is a highly trafficked route of critical national importance and forms part of the TEN-T Core Network. TII refers to Chapter 3 of the Spatial Planning and National Road Guidelines for Planning Authorities and expects that the	the Citywest/Saggart area. These matters are recognised as fundamental to the creation of sustainable communities. The Planning Authority is committed to the delivery of social and community infrastructure and will continue to pursue a range of funding and delivery mechanisms. In this regard, a number of facilities and services have already been implemented or are progressing in the Citywest/Saggart area, with the Fortunestown Local Area Plan supporting the delivery of some of these. For example: - In alignment with County Development Plan COS10 Objective 4 - *'To support the delivery of a new library service in the Citywest area to meet the needs of the expanding population subject to any review of the Library Strategy'* – South Dublin County Council have granted permission (Planning Ref. SD24A/0135) for a public library at the Citywest Shopping Centre. The South Dublin County Council Capital Programme Update (April 2026) states that 'construction continues at Citywest Library and the contractor is projecting build completion by mid-year, with fitout works to follow'. - In addition, the South Dublin County Council Capital Programme Update (April 2026) confirms that 'planning permission has been granted' for Citywest Community Centre and Crèche and the Council 'will now seek to progress to construction with the developer'. This permission relates to Planning Ref. SD22A/0398 and SD25A/0223W and is in accordance with County Development Plan COS3 SLO 2 - *'To deliver a community centre / community facilities within Citywest as part of the delivery of infrastructure identified in the Fortunestown Local Area Plan'*. Groundbreaking is expected to occur in Q3 of this year.

proposed amendment will address the requirements for future development proposals related to noise amelioration, lighting, drainage requirements, and boundary protection and treatments relative to the national roads network. It is indicated that such development considerations should be drafted in the interests of maintaining the operation and safety of the national roads network compatible with such development proposals. The Council is advised that appropriate noise, air, dust, light etc. mitigation must form part of future residential development proposals to ensure residential amenity of future residents. It is indicated that national road infrastructure, including drainage, is designed and provided for the national road network requirements only. TII does not permit connections to national road infrastructure, including that storm water drainage regime, which is exclusive to the national road. Having regard to the above and in the interests of compatibility of the protection of the safe and efficient operation of the national roads network with future residential amenity, TII seeks a revision to the proposed specific local objective on the lands, by adding a new point 4: "Proposed Specific Local Objective Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation	- The Capital Programme Update (April 2026) also states that 'a design brief is also being finalised for the proposed youth facility at Citywest Quarter'. This relates to an application (ED25/0006) from the Land Development Agency. The project will go to tender with completion scheduled in Q1 2027. - The inclusion of CS8 SLO1 in the County Development Plan has facilitated the delivery of a 4-classroom crèche and a number of green spaces located in the centre of Citywest / Fortunestown and on the south east and west of the site with natural play and SUDS elements as well as a large open communal space, all being delivered by a private developer (Planning Ref. SHD3ABP-312501-22). - Upgrade works at Carrigmore Park, delivered by the Part 8 process, has recently been completed in 2025. This included upgrading the existing playspace, a teenspace, a calisthenics workout area, a boules court, a pump track, reinstatement of the pitches, new wetland areas, a new bridge, new planting, a mini woodland, as well as footpath works and upgrades to the existing entrances. - A new HSE primary care facility has been delivered in Citywest. - A commencement notice was received in April 2026 relating to the proposed reconfiguration, internal alteration and fit-out of ground floor unit to provide a medical clinic in Citywest. This relates to Planning Ref. SD25A/0248W and will further strengthen healthcare provision in the Citywest area. The provision of garda stations is a matter for An Garda Síochána. However, should it be indicated that it is required, the Council will seek to facilitate same.

with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia: 1. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, 2. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and 3. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane. 4. In respect of the N7 national road: Appropriate noise mitigation measures for the protection of residential amenity; and the avoidance of direct interaction with the N7 and associated infrastructure including drainage and structures." The NTA has observed that Citywest is within walking distance of Luas and is served by a radial and an orbital bus service. A submission is written by an alliance of resident's associations and community groups dedicated to extending the Dublin Metro (Metrolink) to southwest Dublin. They welcome the revised NPF emphasis on compact growth and TOD but believe it will only work if transport planning aligns with the housing growth strategy. They note that the Greater Dublin Area (GDA) Transport Strategy is based on 2018 population projections and that the Revised NPF has	The Regional Spatial and Economic Strategy identifies Citywest as level 3 on the retail hierarchy for the region. Level 3 is described as 'key service centres' and includes town and/or district centres and sub-county town centres. Citywest Shopping Centre is zoned 'District Centre' reflecting its level 3 status. The Variation site is contiguous to the Citywest employment campus and is also accessible by public transport to the nearby Greenogue industrial area and to Tallaght Town CentreThe Council will continue to support sustainable enterprise and employment growth and to support retail development, recognising the role of retail in creating a vibrant mix of uses in support of our communities. As mentioned above, the Fortunestown Local Area Plan has supported the delivery of supporting facilities and amenities. The County Development Plan contains an objective to facilitate the development of the Citywest / Fortunestown area in accordance with the phasing set out in the Fortunestown Local Area Plan 2012-2022 (as extended) or any superseding LAP: QDP14 SLO 1: *To ensure the sustainable long-term growth of Citywest that continues to promote and facilitate the development of the Citywest / Fortunestown area in accordance with the phasing set out in the Fortunestown Local Area Plan 2012-2022 (as extended) or any superseding LAP, and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.* It is noted that the reference to objective SS1 in the County Development Plan does not exist.

been published since that. The submission notes growth increase from 2,596 to 3,270 units per annum and that the bulk of new growth is to be in existing SDAs focused on high-capacity transport routes, aligned with government policy. The problem is that there is no matching proposed investment in increasing public transport. The submission identifies LUAS Red Line and Kildare line and its proposed upgrade to Dart+ South West as the only two high-capacity corridors in SDCC. The submitters believe that the proposed Variation should include an objective to carry out a study on the feasibility of extending the consented Metro to Dublin southwest, to terminate in Tallaght. This will provide a twenty-first century public transport solution for the people of southwest Dublin including Tallaght and Citywest, and free up capacity on the LUAS Red Line for communities within the M50 cordon. The submission indicates awareness of 'notional ideas' to add a LUAS to Knocklyon and Kimmage but believes these to be unrealistic as the surface corridors don't exist to accommodate them. The submitters believe that the way to overcome the public transport deficits is by prioritising the extension of the Metrolink to Tallaght which would have greater capacity and speed than a Luas. It is suggested that a Metrolink would free up capacity on the Red Line for populations in City Edge and Newlands. The submission notes a commitment in the 2025 Programme for Government which includes the commissioning of an independent feasibility study	Relating to the statement regarding An Bord Pleanála Inspector Reports for nearby developments referencing pressures on schools and community infrastructure, it is unclear what inspector reports the submitter is referring specifically to in relation to the statement. However, it can be assumed that the submitter is referencing the An Bord Pleanála Inspector's Report (ABP-304808-19) which relates to the lands within Fortunestown LAP at Boherboy. In this regard the submission is misleading as the inspector was referencing the applications failure to provide for an adequately sized school site on the lands and other issues which were specific to the site and its location – including the need to upgrade the Boherboy Road where the site was accessing and other access point issues within the site alongside the development itself being deficient in terms of community facilities. This permission was refused ensuring that there was no impact in terms of further population growth until the issues were resolved. Since that time a further planning application has been made under LRD25A/0012W which has included for upgraded road network, the required access points and the necessary provision for a school site. This application was granted by SDCC and is now on appeal. In relation to the requirement for planning authorities to consider the capacity of public services, and as mentioned above, a Settlement Capacity Audit was carried out which involved an evidence-based evaluation of suitability, informed by national policy, infrastructure capacity and sustainable planning criteria. As outlined in the 'Zoning' heading above, a requirement for a community centre / sports hall will be included in the masterplan for the lands.

into continuing MetroLink from city to Southwest Dublin. The submission examines each of the SDAs and their potential delivery of housing and population alongside lands within the Variation at Citywest, their associated existing public transport corridor and the estimated additional loading on each. It is questioned whether the existing and committed investment in public transport infrastructure will have the capacity to cater for the ambitious growth targets. It is submitted that there is a physical limit to the Red Line's carrying capacity, particularly in the city centre and that it is also a 'single point of failure' with incidents and accidents disrupting the service a regular occurrence. Submissions state that recent developments do not have adequate parking and it leaves new residents parking cars arbitrarily, including on cycle lanes, pathways, double yellow lines and grass verges. This is a safety risk as emergency vehicles and wheelchair and pram users find it difficult to pass them. A submission raises safety concerns in respect to Garter Avenue due to several crashes and a tragic death. It is also stated that roads and footpaths are in need of repair. A submission refers to Appendix I of the Planning and Development Act 2024, which states that development may be refused where it would endanger public safety by reason of traffic hazard or obstruction to road users. **Water and Wastewater**	**Schools** The Council notes the submissions concerns regarding school capacity. However, there are a number of major school projects reserved/under construction in the Citywest area: - There is a major project under construction to provide a new education campus accommodating a new post-primary school for Coláiste Pobail Fóla and a primary school for Gaelscoil Lir at the Fortunestown Lane school site under SD19A/0393/EP (as extended under SD19A/0393/EP). There is an existing School Site Symbol on this site under the South Dublin County Council 2022-2028. - The Boherboy lands located to the southeast of the Fortunestown Lane site also contains a school site symbol. As indicated above, a LRD for approximately 611 units has been granted on these lands. In line with the provisions of the South Dublin County Council 2022–2028, the permitted development includes the reservation within the site for the delivery of a school of approximately 1.03 Ha (10,311sq.m). It is acknowledged that Coláiste Pobail Fóla currently operates from temporary accommodation. However, a new education campus is currently under construction which will provide a new post-primary school for Coláiste Pobail Fóla. With regard to the proposal to include a SLO on the Variation lands to facilitate a new Educate Together National School, it is considered that there is a sufficient supply of schools in the area. Citywest Educate Together National School, Citywest and Saggart Community National School, Gaelscoil Lir, Coláiste Pobail Fóla and St. Mary's National School Saggart are all in close proximity (<1km) to the proposed

A number of submissions state that wastewater capacity in the area is a concern. A submission notes that the 9B Sewer is identified locally as 'capacity-sensitive' and therefore a critical constraint on additional zoning. A number of issues are identified relating to this including unverified headroom or proven spare capacity, that capacity is modelled rather than quantified, that the SCA indicates growth in Citywest is unlikely until post 2030 without infrastructure solutions and that the capital programme does not identify a funded upgrade specific to the 9B trunk. As such, risks are identified if the land is rezoned now, including hydraulic surcharge and sewer flooding in storm events, water quality impacts on the Camac catchment and non-compliance with Uisce Éireann connection criteria leading to development stalling. South Dublin's wastewater largely routes to Ringsend Treatment Plant, no evidence is provided to confirm foul drainage capacity or that upgrades are funded/sequenced. It is stated that the rezoning fails to comply with objective IU2 (Infrastructure Provision) of the Development Plan and requires an Infrastructure Capacity Assessment before rezoning. It has also been stated that the Council should ensure several requirements are met in this regard around capacity, pre-connection, SuDS and drainage plans prior to occupation or at plan stage.	Variation site. In addition, further school projects are reserved/under construction, and these are outlined above. Also relevant to wider Citywest / Saggart / Rathcoole / Newcastle neighbourhood area is the provision for a post primary school as part of a SLO in Amendment no 1. at Ballynakelly, Newcastle. The SLO for the proposed Newcastle lands is in response to the County Development Plan objective COS8 SLO 1 which states: COS8 SLO 1 *To identify a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest / Saggart / Rathcoole / Newcastle to provide for the needs identified for the catchment area by the Department of Education.* Furthermore, the Department of Education and Youth submission to the Variation states that the increased school demand 'could be accommodated within existing post primary schools and current capital projects'. Therefore, it is considered that there is an adequate supply of school provision in the area. The Planning Authority engages with the Department of Education and Youth on an ongoing basis to actively review school needs and proposals to ensure adequate school places are delivered and planned for, in accordance with the needs and research undertaken by the Department and informed by information provided by the Planning Authority.

Parts of the Saggart and Citywest area have experienced low water pressure during peak demand periods. A development of the scale proposed could exacerbate these problems unless substantial upgrades to water supply, pumping systems and wastewater infrastructure are completed in advance. In areas where groundwater levels are already high, poorly managed surface runoff can also create potential public health risks. Uisce Éireann has stated that there is a significant watermain network close to site and that local pumping and upgrades may be required based on elevations being similar to supply reservoir. **Parks and Open Space** Several submissions have concerns that rezoning would remove one of the last remaining large green spaces in the Citywest/Saggart area. The lands represent a valuable environmental asset with green open space, hedgerows, mature trees, ponds, rewilded areas, natural boundaries, biodiversity present and it being a wildlife habitat. These habitats support bats, frogs, birds, pollinators and other wildlife. Further development would remove and fragment habitats, weakening local biodiversity and green infrastructure and reduce climate resilience. The lands are a recreational amenity and are currently being used as nature reserves used by dog	It is noted that a submission includes a request for a SLO addressing education provision, funding and timelines. However, it is considered that this issue is adequately addressed by the above. **Transport Infrastructure** *Public Transport and Active Travel* The concerns regarding the public transport network being at capacity are noted. Public transport planning, capacity and service frequency are the statutory responsibility of the National Transport Authority (NTA). South Dublin County Council works closely with the NTA to support delivery through land use planning, road space reallocation and infrastructure delivery such as Luas, BusConnects, Dart+ South West and Cycle South Dublin deliveries. The Dublin Metropolitan Area Strategic Plan (MASP) identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. Citywest is identified within the South West Corridor and is supported by the LUAS Red Line. The Variation lands are within walking distance (500m) of the Red Luas Line Fortunestown Stop, which provides a high frequency public transport service. The concerns in relation to the capacity of the Luas is noted and the Planning Authority will continue to liaise with the NTA in terms of capacity and any other issues arising. The County Development Plan contains an objective which seeks to support additional capacity on the Luas Red Line: SM3 Objective 20 *To support additional capacity on the Luas Red Line, to service the intensification of development in Tallaght and Fortunestown and the future development of the City Edge lands.*

owners and walks. It is suggested that a concept framework could reserve a blue-green spine with low impact pavilions and community buildings set back from the Camac buffer with different placemaking, biodiversity and climate policies advanced by reserving the lands for community, recreation and ecological functions. A submission states that the area needs a large public park, walking and cycling trails and this space can facilitate that. SDCC policy requires the provision of approximately 2.4 hectares of public open space per 1,000 population and Citywest is below this standard. Population is between 10,000 and 15,000 which means Citywest should have 26-36 hectares. Carrigmore park is the only meaningful greenspace with some of it usually flooded and is only 3 hectares. A submission states that rezoning would contradict the County Development Plan policies on green infrastructure and NPF Objective 49 which relates to climate resilience. **Environmental Reports and Flood Risk** A number of submissions raise concerns regarding flood risk on the lands and in the surrounding area. The lands are a natural soakaway within the Camac River catchment and building on wet ground heightens environmental risk. It is stated that increased hard surfacing will elevate runoff volumes	In addition, the Greater Dublin Area Transport Strategy 2022–2042 identifies the Citywest / Saggart corridor as a key growth area to be supported by enhanced public transport, active travel and demand management. In this regard: • BusConnects Dublin includes enhanced bus services and priority measures serving Citywest and surrounding areas • Existing and planned services are intended to improve public transport mode share, capacity and journey reliability • The Planning Authority continues to support the delivery of bus priority, interchange improvements, and walking and cycling links to public transport nodes. The expansion of transport services under BusConnects is programme-based and iterative, where population growth is a key input to service planning by the NTA. The NTA in their submission to the Variation indicates that Citywest is within walking distance of the Luas and is served by a radial and an orbital bus service. The proximity to public transport was one of the factors which informed the identification of the lands for inclusion in the proposed Variation. A submission references National Policy Objective 27, which relates to sustainable transport. It is noted that this submission refers to the National Planning Framework 2018 version which states: National Policy Objective 27: *Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.*

and pollutant loads, raising water quality concerns and increasing flood risk. A submission highlights that there is a failure to apply the Flood Risk Sequential Approach. The OPW notes that in the SFRA, no mapped extents encroach on the site area. There is however an un-modelled watercourse to the south of the zoned area, which has a number of historic flood events associated with it. The submission indicates further detail might be provided as to how risk associated with this watercourse has been assessed. The South Dublin Conservation Society states that the Saggart and Baldonnell Little Streams traverse the proposed site and join the Camac River. Any residential development on this site would have a detrimental impact on the quality of the water. A number of submissions raise cumulative impact concerns regarding the proposed rezoning and the adequacy of environmental assessments carried out: - A submission highlights a failure to conduct adequate environmental assessments. It is indicated that if the Variation is being advanced while key wastewater, cumulative-loading or Appropriate Assessment (AA) issues remain unresolved, then the Council is proceeding without the degree of scientific certainty required. It is suggested that the	The Citywest lands are strategically located within a high-capacity public transport corridor, served by the Luas Red Line (Saggart and Citywest Campus stops), enhanced bus services under the BusConnects Core Bus Corridors, and within the influence of future rail investment under DART+ South West, which seeks to significantly increase rail capacity between Hazelhatch / Celbridge and Heuston Station. The zoning of these lands for residential development is consistent with: • Core Strategy Objective CS1, directing growth towards sustainable transport corridors • Chapter 7 objectives promoting transit-oriented development and active travel • GDA Transport Strategy Measures prioritising intensification around Luas and rail nodes. Regarding the submission by an alliance of resident's associations and community groups dedicated to extending the Dublin Metro (Metrolink), and comments on public transport investment, the Dart+ South West does represent investment as do the railway stations at Kishogue and Fonthill for Clonburris and at Adamstown for that SDZ. New stations are also being proposed to facilitate City Edge regeneration. In terms of high-capacity transport corridors, BusConnects also offers high capacity as defined in the Sustainable Residential Development and Compact Settlements Guidelines. It is noted that the permitted Metrolink project runs from the City Centre to Swords, serving the airport on its route. There is no current measure in the GDA Strategy to extend this route south. However, the inclusion within the GDA Transport Strategy 2022–2042 of Measure

Variation is premature if wastewater headroom, educational capacity, traffic impact, biodiversity constraints and downstream pathways are still uncertain. - A submission highlights raised concerns in relation to an inadequate AA Screening. The submission refers to Article 6(3) of the EU Habitats Directive (92/43/EEC). It notes that where hydrological or ecological pathways exist between a site and downstream protected areas, the planning authority must demonstrate beyond reasonable scientific doubt that no adverse effects will arise. Given the ecological connectivity associated with the Camac River system and associated habitats, the precautionary principle must apply. - It is stated that the cumulative impact of recent, ongoing and proposed development on community infrastructure has not been adequately evaluated and this does not follow the sustainable planning approach and statutory requirements to consider public service capacity. - A submission states that the rezoning would have further cumulative environmental damage, especially to local habitats, wetlands, and wildlife, including bats and amphibians. Incremental removal of hedgerows and increased artificial light from new development can impede on bats. Frogs	LRT2 – Further Metro Development and a post 2042 light rail link promotes the principle of a new light rail link between the city centre and Tallaght by way of Knocklyon. Measure LRT2 is as follows: *Further Metro Development In reviewing and updating the Transport Strategy, which takes place every 6 years, the NTA will assess the requirement to provide additional Metro lines in the GDA based on updated forecast demand for travel and on emerging significant changes in land use and spatial policy, including previously considered options to extend Metrolink southwards towards UCD, or along the existing Luas Green Line, or towards South West Dublin.* While the submission suggests that this is not strong enough there is also an existing Objective in the current County Development Plan which states: SM3 Objective 7 *To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin southwest, including examining the feasibility of Metro and / or Luas, serving areas including Ballyboden, Ballycullen / Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure and the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin southwest.* The identification in the submission of a commitment in the 2025 Programme for Government to commission an independent feasibility study into continuing MetroLink from city to South West Dublin is noted.

and other amphibians could be impacted with the removal of water sources. The cumulative impacts may not be apparent from site-by-site assessments. - A submission identifies cumulative loss as a real risk noting that where changes to vegetation or wet areas / ponds are repeated across a wider growth area the losses for different flora and fauna and for ecological resilience can severely degrade biodiversity. As such, the submission states that the Council must assess the cumulative ecological effects at plan stage rather than relying entirely on later application stage mitigation. The submission highlights key environmental legislation and policy documents, including their purpose. **Housing** It is stated that the scale and density of housing proposed would be wholly out of keeping with the existing residential character of the area. High-density development immediately adjoining established lower-density housing would result in overlooking, loss of privacy, overshadowing and a fundamental change in the character of the surrounding neighbourhood. There is concern that recent development in Saggart has largely consisted of social housing and housing owned by private landlords. There is a lack of homes available for	Furthermore, as evidence of its commitment South Dublin County Council is supporting residents to carry out a socio-economic appraisal of a Metrolink extension through the provision of financial and expert resource. While the arguments put forward in the submission have merits, given the existing strong support in the South Dublin County Development Plan and SDCCs demonstrated commitment further objectives as part of this Variation are neither required nor appropriate. It is considered that the Variation supports walking and cycling accessibility and prioritisation. The SLO includes the provision for a direct, high-quality active travel link through the subject lands between Mill Road and Garter Lane, integrating with existing and planned walking and cycling networks in line with numerous County Development Plan objectives promoting walking and cycling accessibility. *Traffic and Road Network* It is acknowledged that the existing road network in the Saggart / Rathcoole / Citywest area experiences peak hour congestion, particularly on radial routes linking to the N7 corridor and within local distributor roads during morning and evening commuting periods. However, the assessment of road capacity within the Development Plan context is undertaken on the basis of strategic transport modelling at GDA level, led by the NTA, with local traffic and transport assessments undertaken as part of Development Plan preparation and ongoing monitoring of traffic conditions and junction performance. Zoning of land does not in itself permit development, and any development of the lands, as set out in the proposed SLO accompanying Amendment no. 5, shall be in accordance with a masterplan. The proposed SLO represents a strengthened and plan led

private sale, pushing younger generations of local families out of the community. Submissions also raise the following points: - Noise impacts from Casement Aerodrome and the N7 will lead to poor quality of life to residents - Citywest has already met its target housing quotas and housing should be targeted elsewhere - A poor track record with developers in the Citywest area. **Heritage** A submission highlights that intensive rezoning and large-scale suburban development in and around the village threatens to erode the historic character and setting of Saggart. **Policy** A submission states that planning legislation requires development to be supported by adequate infrastructure capacity. The submission refers to Section 10 of the Planning and Development Act 2000 requirements for development plans to include objectives relating to the provision of infrastructure. It is stated that development should contribute to a balanced and sustainable community and be consistent with Goal 11 of the UN Sustainable	approach to addressing the concerns raised in the submissions. In particular: • The requirement for a masterplan ensures coordinated access, layout, permeability and integration with the surrounding network; • The Transport and Traffic Assessment requirement provides a mechanism to assess cumulative impacts and secure mitigation measures, including junction upgrades, active travel infrastructure and public transport integration, where necessary; • The active travel link aligns with key objectives from a national and regional level and with the County Development Plan. The Planning Authority acknowledges various submissions emphasis on infrastructure-first and phased development. The 'Western Dublin Orbital Route' Road is part of the six-year road programme in the County Development Plan. This route is described as a '*link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be primarily to provide resilience to the M50, recognising that this may also provide additional resilience to peripheral roads within the county, in particular between the N7 and N4*'. While the County Development Plan includes this indicative road alignment, in response to Specific Local Objective SM6 SLO 1 of the South Dublin County Development Plan 2022–2028 the Council is currently preparing a brief for a Transport Assessment and Transport Plan for the western area of the county. It is envisaged that the Transport Assessment and Transport Plan will be developed using an Area-Based Transport Assessment (ABTA) methodology, in accordance with TII and NTA guidance, and that one or more Local Transport Plans

Development Goals, which promotes inclusive, resilient communities with access to services and public spaces. The submission also refers to Oireachtas infrastructure policy discussion which emphasises the importance of aligning housing development with the delivery of infrastructure and public services to support sustainable communities. It is stated that rezoning would contribute to urban sprawl which goes against compact growth objectives in the NPF and RSES. It would also not comply with Section 28 Guidelines on compact growth that prioritises brownfield over greenfield where capacity exists. Multiple submissions state that the proposal is contrary to the County Development Plan, including chapters 1, 4, 5, 7, 8, 9 and 11, and the Fortunestown LAP principles of proper planning and sustainable development. A submission calls for preparation of a Local Area Plan (LAP) for Saggart before any further rezonings proceed. A submission sets out seven different policy documents or directives alongside their requirements and the conflict with proposed rezoning as follows:	will be prepared. Subject to the final scope, the process is expected to include public consultation and will assess existing and future travel demand across all transport modes, review existing and planned transport infrastructure and services, identify the need for additional transport interventions, assess options including phasing and cost implications, and identify an integrated package of transport solutions. Having regard to same, appropriate strategic solutions for the transport infrastructure to the west of the county, including this area, will be determined following the outcome of the study which is expected to commence in Q2 2026. In parallel to the strategic study, it is intended to identify a number of interim local measures to address traffic management issues within the wider study area. Another submission references Objective TI1 – Transport Integration in the County Development Plan; however, no such objective exists within the Plan. The Planning Authority acknowledges TII's role under the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and recognises the importance of protecting the strategic function of the national road network, including the TEN-T Core and Comprehensive Networks. The Development Plan already includes a suite of objectives requiring that development proposals adjacent to or affecting national roads: • Demonstrate that the operation, safety and capacity of the national road network are not compromised • Avoid direct access onto national roads • Address noise, air quality, lighting and drainage impacts through appropriate mitigation.

Policy / Guideline	Requirement	Conflict with Proposed Rezoning
NPF	Infrastructure-led growth; compact, sustainable communities	Zoning proposed despite unresolved schools, transport, GP and wastewater capacity
RSES/MASP	Protect strategic employment nodes; align housing with transport	Loss of employment potential; increased car-based commuting
County Development Plan 2022-2028	Protect Green Infrastructure and riparian corridors	Pressure on Camac corridor; loss of ecological connectivity
Floods Directive and FRM Guidelines (2009)	Avoid increasing flood risk; sequential approach	Additional runoff to Camac catchment; zoning precedes FRA evidence
Habitats and Birds Directive	Protect European Sites/species; apply AA	Likely significant effects cannot be excluded without AA screening

These objectives apply equally to rezonings and to subsequent planning applications and masterplans. As such, it is not considered necessary to replicate the objectives into the SLO as noise mitigation measures and avoiding direct interaction with the N7 will be adequately addressed during the masterplan and the planning application stage as already required by the County Development Plan.

Concerns regarding the lack of parking and road safety issues are noted. Regarding unauthorised car parking on pavements, double yellow lines, cycle tracks and green verges, the Council's transport section will liaise with the Gardai where appropriate. In response to concerns regarding road safety, it is noted that a SLO is proposed in conjunction with Amendment no. 5. The SLO requires that development of the lands shall be in accordance with a masterplan. This masterplan will be informed by a Transport and Traffic Assessment, which will assess the impacts of the proposed development and identify measures to alleviate its impact. This includes road safety. In addition, road safety will be assessed at planning application stage when Road Safety Audits and appropriate mitigation (e.g., junction upgrades, traffic calming) will be required.

South Dublin County Council is responsible for the maintenance of approximately 945 kms of road network in South Dublin. Every year South Dublin County Council carry out a Road and Footpath Repair Programme. Locations requiring repair are identified following inspections by the roads inspector. Inspections are carried out upon receipt of repair requests from Councillors/members of the public or locations identified by inspectors in the course of their work. The 2026 Roadworks Programme, which was presented to elected members on the 9th February, contains a budget of €10.25m including €3.6m

Healthy Placemaking	Provide recreation/youth spaces near homes	Rezoning removes last major opportunity for a local sports/youth campus & community park
Settlement Capacity Audit	Phase growth to infrastructure timelines	SCA indicates major growth only feasible post-2030 without solutions

A submission provides supporting evidence links and references to the Planning and Development Acts and other planning legislation, Oireachtas discussions, plans, policies and strategies. All of which are used to oppose the proposed zoning.

Miscellaneous
A submission objects to any attempt to identify the Sacra South lands as a Future Strategic Long-Term Development Area, and they should be retained as open space / strategic green infrastructure and should be considered for public and community infrastructure.

The submission recommends the provision of 16 no. SLO's be included in relation to the subject lands. The proposed SLO's, as detailed, largely concern the dedicated to road resurfacing, €3.6m to footpath repairs/improvements and €700k to patching/potholes.

In addition, the County Development Plan contains the following objective:

SM2 Objective 10:
To further develop a footpath and cycle path repair and assessment system where members of the public can report maintenance issues and instigate repairs, and to implement a public lighting renewal, improvement and maintenance strategy in urban areas that provides adequate public lighting and puts the safety of pedestrians, cyclists, women and minority groups at the heart of this strategy, and to ensure that cycle paths are consistently and properly maintained to a high standard to ensure that cyclists use them.

Regarding the referenced planning agreement in Millrace, the Planning Enforcement team are in place to ensure development is carried out in line with granted permissions and conditions. Enforcement queries should be directed to the planning enforcement section of the Council. This Variation has no role in relation to enforcement issues.

Water and Wastewater
Uisce Éireann's submission to the Variation indicates that a significant watermain network is located close to the site, local upgrades may be required. It is also indicated that local pumping may be required based on elevations being similar to supply reservoir. Having regard to the submission from UÉ, it is considered that any constraints could be overcome by the developer at a local level.

following: physical and social infrastructure provision, parks and open space, school provision, phasing, heritage and environmental protection(s).	Uisce Éireann have also advised the Planning Authority that the 9B sewer is the main strategic foul sewer serving a significant part of South Dublin. There are known constraints and issues with this sewer primarily due to stormwater/surface water run-off water inputs and storm misconnections. A Drainage Area Plan of the network is being developed which considers both current and future scenarios. There is a feasibility study / concept design ongoing to determine the preferred solutions and phasing required for the 9B Sewer catchment. In the interim, developers may off-set flows into the existing network by removing surface water, infiltration and other misconnections from the combined system and direct to the surface water network. The Drainage Catchment area terminates at Ringsend WWTW that has recently undergone a major upgrade and has capacity. Regarding confirmation of capacity, Uisce Éireann advises that capacity in networks and treatment plants is constantly changing. Water Supply and Wastewater Capacity Registers are published annually and are available to view on the Uisce Éireann website. As part of the settlement capacity audit, an infrastructure assessment was carried out for this site and involved the assessment of wastewater and water supply in consultation with Uisce Éireann. South Dublin County Council works with Uisce Éireann and developers to promote SuDS and other Nature Based Solutions to improve quality of surface water reaching our waterways. South Dublin County Council has its own SuDS guidance document and is also guided by the 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance' document outlines how to move towards a more systematic and sustainable approach to urban planning through water sensitive urban

	design. Uisce Éireann also works with the Local Authority Water Programme. Furthermore, the County Development Plan seeks to limit run-off through the implementation of SuDS and contains the following objective: GI4 Objective 1: *To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.* Low water pressure incidents is a general operational issue and should be reported directly to Uisce Éireann. It is noted that the reference to objective IU2 in the County Development Plan does not exist. **Parks and Open Space** The submissions concern about the lands being used for recreation and representing a valuable environmental asset and supporting biodiversity and wildlife is noted. However, the Specific Local Objective proposed in conjunction with Amendment no. 5 requires that any development on the lands '*shall be in accordance with a masterplan'.* The masterplan is required to be informed by an Ecological Impact Assessment *'to ascertain usage of the site and surrounding lands by mobile species'*. As such, the proposed SLO reflects a plan-led approach to the sustainable development of the site, ensuring that

	environmental considerations are fully captured to inform future development. The provision of public open space will be required to conform with the public open space standards as set out in Table 8.2 of the County Development Plan, with a minimum 10% of open space to be delivered on the lands as part of any development. In addition, the Ecological Impact Assessment as part of the requirement of the masterplanning process will further inform the most appropriate approach to open space and the requirements for both public amenity and biodiversity enhancement and further inform the detailed design of parks and open space at planning application stage. As outlined in the 'Community and Social Facilities' heading above, upgrade works at Carrigmore Park were completed in 2025. This has contributed to improving the quality of open space in the area. The County Development Plan, in Figure 4.4, identifies five primary GI corridors across the County. The Variation site overlaps with the Primary GI Corridor 5 (Camac River Corridor) and the Citywest-Saggart Secondary GI Link (L7). Therefore, the subject lands offer potential to enhance these existing GI Corridors and the green infrastructure network, aligning with County Development Plan objectives, including: Policy GI2: Biodiversity *Strengthen the existing Green Infrastructure (GI) network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan,*

	2020-2026, the National Planning Framework (NPF) and the Eastern and Midlands Region Spatial and Economic Strategy (RSES). Strategic Corridor 5: Camac River Corridor *-To avoid further fragmentation of the Green Infrastructure network at the urban fringe and strengthen existing ecological links between built-up areas along this corridor.* *-To enhance the GI network by addressing habitat quality issues along the Camac River and by identifying and including additional 'stepping stone' opportunities along the river.* *-To improve the ecological GI value and connectivity of landscape features created as part of permitted development.* The County Development Plan also contains the following objective: GI7 SLO 1: *The current green wildlife corridor between Saggart and Rathcoole be maintained and the need to preserve this wildlife corridor be incorporated into the design and development plans for Rathcoole Park.* The Council will continue to support these objectives and work with all key stakeholders as opportunities arise. It is considered that the rezoning would not contradict with the existing GI policies. It is noted that the reference to NPF Objective 49 is not relevant to climate resilience or this Variation. In the revised NPF, Objective 49 relates to maritime economy and the 2018 NPF it relates to tourism initiatives. **Environmental Reports and Flood Risk** *SFRA*

	The proposed Variation is accompanied by a Strategic Flood Risk Assessment (SFRA), in accordance with the relevant Section 28 Guidelines. This SFRA was completed by JBA Consulting and assessed each Variation site, including Amendment no. 5 (Site 146). The flooding concerns raised in submissions are noted. The Variation site has no formal watercourses within its boundaries. The River Camac flows to the northwest of the site, but the high end flood scenario (HEFS) extents do not encroach on the site. The site is not within Flood Zone A or B, nor within the 1% AEP and 0.1% HEFS extents. No Justification Test is required and the Variation is appropriate from a flood risk perspective. Regarding the OPW submission, on further examination of the lands following the submission, it has been confirmed to SDCC by the consultants carrying out the SFRA that the site has no formal watercourses within its boundaries. It is noted that ornamental ponds and surface water features within the site require detailed assessment at development management stage as part of the masterplanning process. The un-modelled watercourse identified by the OPW lies to the south of the site boundary. The SFRA site assessment for the lands will be updated to address the risk from this feature, including reference to its historic flood record. The Chief Executive recommends the Specific Local Objective (SLO) for Amendment no. 5 be updated to require a site-specific FRA addressing both the ornamental surface water features within the site and the un-modelled watercourse to the south.

	The South Dublin Conservation Society identifies the Saggart and Baldonnell Little Streams as features traversing the proposed site area. The SFRA will be reviewed to confirm whether these correspond to the un-modelled watercourse identified by the OPW or represent distinct features and will update the site assessment accordingly. *SEA* Following issues raised in the submissions, the Planning Authority requested the SEA / AA consultants to review them and advise of any issues which may need to be addressed further as part of the Variation. As noted above, the SLO for the lands requires that any development on the lands '*shall be in accordance with a masterplan'.* This will address and be informed by an Ecological Impact Assessment (EcIA) to ascertain usage of the site and surrounding lands by mobile species. The inclusion of requirement for EcIA seeks to ensure that any masterplanning is supported by appropriate and profession ecological surveys. The Chief Executive recommends an amendment to bullet point 'a' in the SLO, relating to the Ecological Impact Assessment, for clarity purposes. In addition, the Chief Executive recommends that the EcIA should inform the need or otherwise for dark corridors and wildlife friendly lighting. The recommended amendments to the proposed SLO in relation to biodiversity and surface water are set out in bold below: CS8 SLO2: Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia:

	a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, **ECIAs to be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and any superseding guidance.** **b. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife through sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance** **c. An analysis of the existing water features to include for their incorporation as part of wider nature based solutions to surface water management where feasible and appropriate** d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact and e. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane. Cumulative ecological effects are noted and are an important point relating to fragmentation and erosion over time. The SLO proposed above requires ecological impact assessment to inform future masterplanning and specific measures pertaining to minimising lighting and retention of surface water features as part of overall masterplanning where they are required and appropriate.

	In relation to comments on cumulative impacts, plans and programmes considered as part of this assessment includes the hierarchy of land use and related plans pertinent and relevant to the proposed Variation, namely: • National Planning Framework First Revision • River Basin Management Plan for Ireland 2024 • Eastern and Midland Regional Economic and Spatial Strategy • Catchment-based Flood Risk Assessment and Management (CFRAM) and Flood Risk Management Plans • Greater Dublin Drainage Project • National 4th Biodiversity Action Plan 2023-2030 • Transport Strategy for the Greater Dublin Area 2022- 2042 • South Dublin Climate Change Action Plan 2024 -2029 • BusConnects • DART+ South West and DART +West • Dublin City Development Plan 2022 -2028. Dún Laoghaire Rathdown County Development Plan 2022 - 2028, Kildare County Development Plan 2022 -2028, Fingal County Development Plan 2023 -2029 All of the above plans and programmes have been subject to full SEA and AA and where relevant project level assessment through the EIA and AA Directives. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA for the proposed Variation and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022 –

	2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach of the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the proposed lands which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process. **Housing** As Citywest is within the Dublin City and Suburbs settlement category and is classified as 'City – Suburban/Urban Extension', the Compact Settlement Guidelines (2024) indicate a net density range of '40-80 dph shall generally be applied', and that 'densities of up to 150 dph shall be open for consideration at 'accessible' suburban / urban extension locations'. See Table 5.1 of the Proposed Variation No. 2 Written Statement for reference. In relation to noise, density, typology, building height and residential layout, the Planning Authority notes that these matters are appropriately addressed at the masterplanning and planning application stage, where site-specific proposals are assessed against prevailing national and local policy. Future development proposals will be required to demonstrate high-quality urban design and to safeguard the amenities of existing and future residents. This includes, but is not limited to, the assessment of potential impacts relating to noise, loss of daylight, overshadowing, overlooking and impacts on the character of adjoining established neighbourhoods. Development proposals which

	fail to adequately address these considerations would not be supported. The concerns are noted regarding housing largely being owned by private landlords and consisting of social housing. With regard to social and affordable housing, such provision is governed by the legislative requirements of the Planning and Development Act 2000 (as amended) and, where applicable, the Planning and Development Act 2024 (as amended). The Council seeks to promote a mix of house types and tenures and contains the following policies and objectives: Policy QDP10: Mix of Dwelling Types *Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.* H1 Objective 13: *To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) and the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.* Policy H3: Housing for All *Support the provision of accommodation for older people and people with disabilities and / or mental health issues within established*

	residential and mixed-use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities. Accordingly, it is considered that the proposed residential zoning is appropriate in principle, subject to all future development being assessed against current or emerging policy, infrastructure capacity, and residential amenity considerations at the masterplanning and planning application stage. Regarding poor track record of developers in the area, should there be concerns that planning applications are not being complied with, this should be addressed through complaints / queries to the planning enforcement section of the Council. **Heritage** The concern about the negative impact of development on Saggart is noted. However, it is important to clarify that the rezoning simply identifies land use potential within the Development Plan; it does not grant permission for development, nor does it predetermine the form, scale or acceptability of any future proposal in heritage terms. Any future development proposals will be required to demonstrate, to the satisfaction of the Planning Authority, that there is no unacceptable or detrimental impact on Saggart Village and any heritage features. In this regard, the County Development Plan includes objectives relating to heritage which will be considered as part of the assessment of any planning application, as may be necessary. **Policy** Regarding submissions stating that the Variation fails to comply the Planning and Development Act 2000 infrastructure capacity

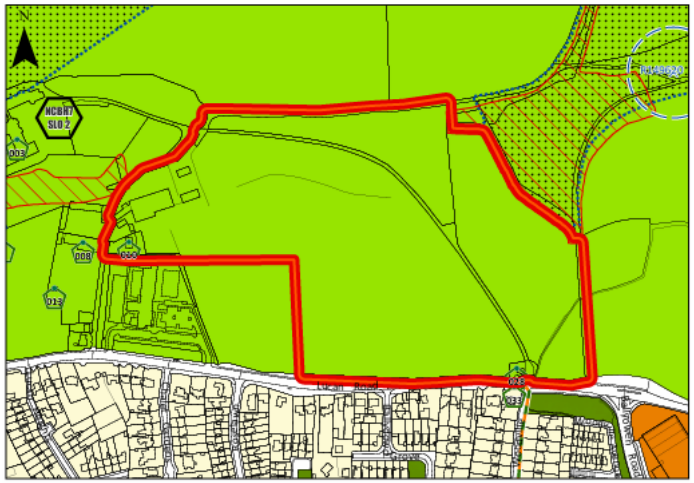
	requirements. This Variation has undergone a thorough assessment process, including an Infrastructure Assessment as part of the Settlement Capacity Audit. The Variation site is also consistent with Goal 11 of the UN Sustainable Development Goals. The issues raised are addressed in the content of the response above. The Planning Authority considers that concentrating growth in areas adjoining existing built-up footprints, rather than dispersing development into less accessible greenfield locations, is consistent with the national policy approach. The Planning Authority is satisfied that the proposed rezoning of Citywest represents a strategic, plan-led response to national housing requirements, grounded in compact growth principles. When read in conjunction with the Section 28 Guidelines, the Development Plan policies, and the Specific Local Objective, the rezoning provides a controlled framework that supports sustainable development in an accessible location. The Chief Executive does not consider that Amendment no. 5 should be contingent on the preparation of a Saggart Local Area Plan. It is noted that there is an objective in the County Development Plan to deliver a Saggart LAP: QDP14 Objective 5: *To prepare a Local Area Plan for Saggart*. Furthermore, owing to the changes in legislation, the delivery of the equivalent of a local area plan will not be possible until the adoption of the next County Development Plan. However, the requirement for a masterplan for the lands with the proposed recommendations for further revisions will ensure a robust plan-led development for the Variation lands.

	Miscellaneous Regarding the SLO recommendations, the detail around these issues will be considered as part of the preparation of the masterplan. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. In this regard, the lands identified at Citywest are considered to meet the criteria for compact growth and transit-oriented development which are within the built-up area located sequential to the Dublin City and Suburbs settlement and within the Saggart settlement. In addition, the inclusion of the requirement for a masterplan, with the additional recommendations by the Chief Executive, provides for comprehensive safeguards to ensure sustainable development. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation It is recommended that CS8 SLO 2 for the subject lands is amended as follows:	

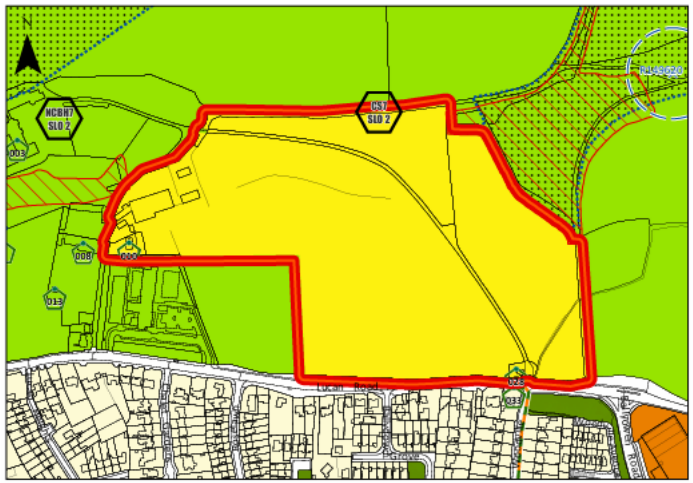
CS8 SLO2:
Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia:

a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, **ECIAs to be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and any superseding guidance.**
b. **Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife through sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.**
c. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact and
d. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane.
e. **A site-specific FRA addressing both the ornamental surface water features within the site and the un-modelled watercourse to the south.**
f. **An analysis of the existing water features to include for their incorporation as part of wider nature-based solutions to surface water management where feasible and appropriate**
g. **Provision for a community centre / sports hall of approximately 1500sqm, or as agreed with the Planning Authority.**

AMENDMENT NO. 6 - ST. EDMUNDSBURY



Existing



Proposed

Submission No.

SD-C401-CDP25-1 – Joey Byrne

SD-C401-CDP25-5 – Darragh Bacon

SD-C401-CDP25-9 – Adrienne Darcy

SD-C401-CDP25-10 – Andrew Darcy

SD-C401-CDP25-14 – Orlagh Keogh Keogh

SD-C401-CDP25-15 – Domenico Locatelli

SD-C401-CDP25-18 – Adam McManus

SD-C401-CDP25-20 – David McCormack

SD-C401-CDP25-22 – Regina McManus

SD-C401-CDP25-23 – James McCann

SD-C401-CDP25-24 – Donncha McManus

SD-C401-CDP25-25 – Deirdre Sadler

SD-C401-CDP25-26 – Caoimhe McManus

SD-C401-CDP25-30 – David Lane

SD-C401-CDP25-32 – Graham Forde

SD-C401-CDP25-33 – Matthew McCann	SD-C401-CDP25-34 – Brian Holland	SD-C401-CDP25-35 – Lauren Markey
SD-C401-CDP25-36 – Daren O Brien	SD-C401-CDP25-37 – Sarah Foley	SD-C401-CDP25-39 – Jorge Collado
SD-C401-CDP25-41 – Ilya Ustinov	SD-C401-CDP25-42 – Kate Taylor	SD-C401-CDP25-43 – Matthew McCann
SD-C401-CDP25-44 – Ciaran Henry	SD-C401-CDP25-45 – Nicola Henry	SD-C401-CDP25-46 – Ruth French
SD-C401-CDP25-47 – Sinead Nolan Nolan	SD-C401-CDP25-48 – Andrew Finn	SD-C401-CDP25-49 – DEBBIE O'BRIEN
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SD-C401-CDP25-56 – Cathal Nolan	SD-C401-CDP25-57 – James Connolly	SD-C401-CDP25-58 – John roche
SD-C401-CDP25-59 – Chris Bligh	SD-C401-CDP25-60 – Janice Walsh	SD-C401-CDP25-61 – Eimear Scully
SD-C401-CDP25-62 – Patrick Kenna	SD-C401-CDP25-64 – Jessica Molloy	SD-C401-CDP25-65 – Tracy Malone
SD-C401-CDP25-66 – Lisa Scahill	SD-C401-CDP25-67 – Rose Murray	SD-C401-CDP25-68 – Michelle Murphy
SD-C401-CDP25-69 – Nicky Weir	SD-C401-CDP25-70 – Emmet Rafferty	SD-C401-CDP25-71 – Emmet Rafferty
SD-C401-CDP25-72 – Veron Tavey	SD-C401-CDP25-73 – Julieann Byrne	SD-C401-CDP25-74 – Sophie Henry
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SD-C401-CDP25-79 – Fiona Martin	SD-C401-CDP25-80 – Fiona Wallace	SD-C401-CDP25-81 – Ella Marten

SD-C401-CDP25-82 – Rachel Tuohy Tuohy	SD-C401-CDP25-83 – Aisling Murphy	SD-C401-CDP25-84 – Katie O'Shaughnessy
SD-C401-CDP25-85 – James Delaney	SD-C401-CDP25-86 – Tom Tuohy	SD-C401-CDP25-87 – Noelle Whelan
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SD-C401-CDP25-91 – Maureen Dunne	SD-C401-CDP25-92 – Jagadish Mahadevan	SD-C401-CDP25-93 – Nic Crocker Nic Crocker
SD-C401-CDP25-94 – Julie Monahan	SD-C401-CDP25-95 – Kate Henry	SD-C401-CDP25-96 – Darren Brennan
SD-C401-CDP25-97 – Emily Kinsella McMahon	SD-C401-CDP25-98 – Kate McMahon	SD-C401-CDP25-99 – Alicia Carroll
SD-C401-CDP25-100 – Margaret Faherty	SD-C401-CDP25-101 – Thomas Woods	SD-C401-CDP25-102 – Leanne Malone
SD-C401-CDP25-103 – Ian Smallman	SD-C401-CDP25-104 – Kim McCrave	SD-C401-CDP25-105 – Clare Strickland
SD-C401-CDP25-106 – Marcia McDonagh	SD-C401-CDP25-107 – Mark Sheridan	SD-C401-CDP25-108 – Sile Dooley
SD-C401-CDP25-109 – Mark Kavanagh	SD-C401-CDP25-110 – Anna Chrysovergi	SD-C401-CDP25-111 – Fintan Ward
SD-C401-CDP25-112 – Elaine McConnell	SD-C401-CDP25-113 – Mark McConnell	SD-C401-CDP25-114 – Joe Byrne

SD-C401-CDP25-115 – Phil Tavey	SD-C401-CDP25-116 – Áine Byrne	SD-C401-CDP25-117 – Brid McCormack
SD-C401-CDP25-118 – Aoife Flood	SD-C401-CDP25-119 – Maude Mcmenamin	SD-C401-CDP25-120 – Anya Dunne
SD-C401-CDP25-121 – Hanna Varghese	SD-C401-CDP25-122 – julieanne anderson	SD-C401-CDP25-123 – Sara Devine
SD-C401-CDP25-124 – Isabella Fitzsimons	SD-C401-CDP25-126 – Laoibhse Curtis	SD-C401-CDP25-127 – Deborah Ilori
SD-C401-CDP25-129 – Aoibheann Mcshea	SD-C401-CDP25-141 – sarah tavey	SD-C401-CDP25-143 – Marian Brennan
SD-C401-CDP25-146 – Orla Kelly	SD-C401-CDP25-147 – Conor OShea	SD-C401-CDP25-148 – Cronan Dooley
SD-C401-CDP25-149 – Áine Gallagher	SD-C401-CDP25-155 – Graham O'Brien	SD-C401-CDP25-156 – Stephen Malone
SD-C401-CDP25-157 – Zelda Cunningham	SD-C401-CDP25-159 – Milosz Konczarek	SD-C401-CDP25-165 – David POWER
SD-C401-CDP25-166 – Elaine O'Hare	SD-C401-CDP25-167 – Sharon Carroll	SD-C401-CDP25-168 – Róise Tavey
SD-C401-CDP25-170 – Kevin Donoghue	SD-C401-CDP25-172 – F Croke	SD-C401-CDP25-173 – Irene OShea
SD-C401-CDP25-175 – Joanna Faughnan	SD-C401-CDP25-176 – Emer Dunne	SD-C401-CDP25-177 – Anand RAJAGOPALAN

SD-C401-CDP25-178 – NIranjana Rajagopalan	SD-C401-CDP25-179 – Kate Blanchfield	SD-C401-CDP25-180 – Holly Enright
SD-C401-CDP25-182 – Terri Moloney	SD-C401-CDP25-183 – Kelley Dunleavy	SD-C401-CDP25-184 – Sean Young
SD-C401-CDP25-185 – Caroline Hogarty	SD-C401-CDP25-186 – Danijela Klopotan	SD-C401-CDP25-188 – Paddy Scully
SD-C401-CDP25-189 – Ciarán Scully	SD-C401-CDP25-190 – Dara-Jane Ruane	SD-C401-CDP25-197 – Simon Dowling
SD-C401-CDP25-200 – Sofia Alberty	SD-C401-CDP25-201 – ray Oconnell	SD-C401-CDP25-202 – Carol Palmer
SD-C401-CDP25-203 – David O'Reilly	SD-C401-CDP25-204 – Kenneth Maguire	SD-C401-CDP25-206 – Louise Heffernan
SD-C401-CDP25-210 – Emmet Rafferty	SD-C401-CDP25-211 – jorgea rafferty	SD-C401-CDP25-214 – Maureen Young
SD-C401-CDP25-219 – Malachy Tuohy	SD-C401-CDP25-224 – John Brennan	SD-C401-CDP25-227 – Emma Gavin
SD-C401-CDP25-228 – Denise Collins	SD-C401-CDP25-229 – Margaret Dennehy	SD-C401-CDP25-232 – Agnieska Nieduelaic
SD-C401-CDP25-233 – Alan McKiernan	SD-C401-CDP25-234 – Eamon McKiernan	SD-C401-CDP25-236 – Catherine Murphy
SD-C401-CDP25-238 – Ian Boyle	SD-C401-CDP25-239 – Joe Reynolds	SD-C401-CDP25-240 – John Farrell
SD-C401-CDP25-241 – Kieran Farrell	SD-C401-CDP25-242 – desmond kelly	SD-C401-CDP25-243 – Mary Geraghty
SD-C401-CDP25-244 – Michael Mahon	SD-C401-CDP25-245 – Paul Henry	SD-C401-CDP25-246 – Catherine Kelly

SD-C401-CDP25-247 – Robert McMahon	SD-C401-CDP25-251 – Sheena Bolger	SD-C401-CDP25-252 – Ruth Keane Reid
SD-C401-CDP25-253 – Stephen Bennet	SD-C401-CDP25-254 – Gillian Gilbert	SD-C401-CDP25-255 – Des Morley
SD-C401-CDP25-256 – Mirna Salamon	SD-C401-CDP25-260 – Ursula Feeney	SD-C401-CDP25-261 – Philip Jordan
SD-C401-CDP25-264 – Patricia Rochford	SD-C401-CDP25-265 – Keith Graham	SD-C401-CDP25-266 – Sarah Murphy
SD-C401-CDP25-267 – Tina Lewis	SD-C401-CDP25-268 – Alison Crowe	SD-C401-CDP25-271 – Jim Hand
SD-C401-CDP25-272 – James Murphy	SD-C401-CDP25-273 – Patrick Bradshaw	SD-C401-CDP25-275 – Catherine Murphy
SD-C401-CDP25-277 – Molly Mc	SD-C401-CDP25-278 – Nicola Duffy	SD-C401-CDP25-279 – Jennifer Rafter
SD-C401-CDP25-280 – Jennifer Rafter	SD-C401-CDP25-282 – John Kelly	SD-C401-CDP25-283 – Colin Bond
SD-C401-CDP25-285 – Trisha Duffy-Barber	SD-C401-CDP25-287 – David Lombard	SD-C401-CDP25-288 – Thomas O' Hare
SD-C401-CDP25-289 – Paula Doyle	SD-C401-CDP25-290 – Paula Slavin	SD-C401-CDP25-291 – Elaine O' Hare
SD-C401-CDP25-292 – Alan Brady	SD-C401-CDP25-294 – Roisin Mills	SD-C401-CDP25-295 – Suzanne Andrews
SD-C401-CDP25-296 – Philomena Burke	SD-C401-CDP25-297 – Sonia McKiernan	SD-C401-CDP25-298 – Billy Rafter
SD-C401-CDP25-299 – Marie Manders	SD-C401-CDP25-300 – mark harewood	SD-C401-CDP25-301 – Terry Keane

SD-C401-CDP25-302 – Teresa Lynch	SD-C401-CDP25-303 – Emmet Grant	SD-C401-CDP25-304 – Tom O' FGlynn
SD-C401-CDP25-306 – aoife rafter	SD-C401-CDP25-307 – David Francis	SD-C401-CDP25-308 – Michael Dwyer
SD-C401-CDP25-309 – Mario Ilha	SD-C401-CDP25-310 – Neasa Henry	SD-C401-CDP25-311 – Ann Crowley
SD-C401-CDP25-312 – Gary Conroy	SD-C401-CDP25-319 – Ronan Dunne	SD-C401-CDP25-320 – Karl Meehan
SD-C401-CDP25-321 – Kate McMahon	SD-C401-CDP25-322 – Veronica O Callaghan	SD-C401-CDP25-325 – Cathal ODonnell
SD-C401-CDP25-330 – Sarah McDermott	SD-C401-CDP25-331 – Hugh McKiernan	SD-C401-CDP25-332 – Donal Begley
SD-C401-CDP25-335 – ian mclaughlin	SD-C401-CDP25-338 – Kieron Byrne	SD-C401-CDP25-339 – Alyson Brady
SD-C401-CDP25-340 – Dolores Donnelly	SD-C401-CDP25-341 – Catherine Lane	SD-C401-CDP25-345 – Eileen Sheahan-mclaughlin
SD-C401-CDP25-346 – Patricia Greene	SD-C401-CDP25-347 – Jacqueline Cable	SD-C401-CDP25-349 – Angela Kelly
SD-C401-CDP25-350 – Liam Byrne	SD-C401-CDP25-351 – Aoife Byrne	SD-C401-CDP25-352 – Derek Byrne
SD-C401-CDP25-353 – Carl Humphreys	SD-C401-CDP25-354 – Carmel Byrne	SD-C401-CDP25-355 – Jason Kavanagh
SD-C401-CDP25-356 – Susan Kavanagh	SD-C401-CDP25-357 – Rose Aherne	SD-C401-CDP25-358 – Katie Hynes
SD-C401-CDP25-359 – Shane Nestor	SD-C401-CDP25-361 – Alan Slaughter	SD-C401-CDP25-364 – Stephen Mason
SD-C401-CDP25-367 – Private citizen	SD-C401-CDP25-368 – Orla Flanagan	SD-C401-CDP25-369 – Darrell Carey

SD-C401-CDP25-370 – Walter Bermingham	SD-C401-CDP25-371 – Emilia Drzewiecka	SD-C401-CDP25-372 – Kayleigh Fox
SD-C401-CDP25-373 – Anne Hayes	SD-C401-CDP25-374 – Antoinette Fox	SD-C401-CDP25-376 – Jean Keogh
SD-C401-CDP25-378 – Joseph Fox	SD-C401-CDP25-381 – Valerie O'Neill	SD-C401-CDP25-382 – Brian O'Neill
SD-C401-CDP25-384 – Miriam Cuesta Moratinos	SD-C401-CDP25-385 – Mary Maloney	SD-C401-CDP25-387 – Philip Kavanagh
SD-C401-CDP25-388 – Robert Maloney	SD-C401-CDP25-389 – Krystal Sweedman	SD-C401-CDP25-390 – Emer Maloney
SD-C401-CDP25-391 – Pat Lennon	SD-C401-CDP25-393 – Aisling Lennon	SD-C401-CDP25-394 – Stephen Moffitt
SD-C401-CDP25-395 – Fiona Wolfe	SD-C401-CDP25-396 – cathy harrison	SD-C401-CDP25-397 – Brendan Lennon
SD-C401-CDP25-398 – Terry Abbott	SD-C401-CDP25-401 – Denis Cronin	SD-C401-CDP25-404 – Tiernan Connolly
SD-C401-CDP25-406 – Joe Whyte	SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-409 – TONY FEENEY
SD-C401-CDP25-412 – Colette McParland	SD-C401-CDP25-413 – Vivek Soni	SD-C401-CDP25-414 – niall oneill
SD-C401-CDP25-415 – Kevin Nolan	SD-C401-CDP25-416 – Barbara O'KEEFFE	SD-C401-CDP25-417 – Aaron Elliott
SD-C401-CDP25-418 – Michael Delany	SD-C401-CDP25-419 – Allison Davis	SD-C401-CDP25-420 – Barbara Sharkey

SD-C401-CDP25-421 – Soyel Alam	SD-C401-CDP25-424 – Barry Aherne	SD-C401-CDP25-425 – Claire Keogh
SD-C401-CDP25-426 – Aidan Brennan	SD-C401-CDP25-428 – Bernadette Boylan	SD-C401-CDP25-430 – Katie McCourt
SD-C401-CDP25-431 – Lorna Quinn	SD-C401-CDP25-433 – Joe O'Rourke	SD-C401-CDP25-435 – Javaid Butt
SD-C401-CDP25-436 – Glenn Tubbert	SD-C401-CDP25-437 – Carmel Dwan	SD-C401-CDP25-438 – Sean Geraty
SD-C401-CDP25-445 – Karen Muir	SD-C401-CDP25-446 – Fiachra Brennan	SD-C401-CDP25-447 – Rita Jenkins
SD-C401-CDP25-450 – Adrienne Doherty	SD-C401-CDP25-452 – Sarah Argue	SD-C401-CDP25-453 – Mary Argue
SD-C401-CDP25-454 – Carol Gallagher	SD-C401-CDP25-455 – Elizabeth O'Reilly	SD-C401-CDP25-456 – Thomas O'Reilly
SD-C401-CDP25-457 – Tracey Gallagher	SD-C401-CDP25-461 – Marian Carroll	SD-C401-CDP25-462 – Ciara Dardis
SD-C401-CDP25-463 – Alan Tolan	SD-C401-CDP25-464 – Sarah Barragry	SD-C401-CDP25-469 – Patricia Graham
SD-C401-CDP25-472 – Phyllis McNamara	SD-C401-CDP25-477 – Joe Mahon	SD-C401-CDP25-478 – Paul Donnelly
SD-C401-CDP25-480 – Joy Hearn	SD-C401-CDP25-481 – Trevor Morrow	SD-C401-CDP25-482 – Maciej Zajakala
SD-C401-CDP25-483 – Enda Haughey	SD-C401-CDP25-489 – Seonaidh Ryan	SD-C401-CDP25-492 – Barbara Kenna
SD-C401-CDP25-496 – Roger Cromer	SD-C401-CDP25-499 – Fiona Dwyer	SD-C401-CDP25-500 – Stewart Dwyer

SD-C401-CDP25-501 – Pat O Dwyer	SD-C401-CDP25-502 – Bláthnaid O'Dwyer	SD-C401-CDP25-504 – Fiona Rigney
SD-C401-CDP25-506 – Neal Murphy	SD-C401-CDP25-509 – Niamh Doyle	SD-C401-CDP25-514 – Fearghal Bracken
SD-C401-CDP25-515 – Justin Kilduff	SD-C401-CDP25-516 – Carmel O'Keeffe	SD-C401-CDP25-517 – kathy Maher
SD-C401-CDP25-518 – Michael Cody	SD-C401-CDP25-521 – Cait Cunningham	SD-C401-CDP25-522 – Paul Gleeson
SD-C401-CDP25-523 – Deirdre O'Shea Deirdre O'Shea	SD-C401-CDP25-526 – Roy Lynch	SD-C401-CDP25-527 – Gordon Dowling
SD-C401-CDP25-528 – Natasha Bartlett	SD-C401-CDP25-529 – Marie Flanagan	SD-C401-CDP25-530 – Micheál Boland
SD-C401-CDP25-531 – Stephen Lydon	SD-C401-CDP25-532 – P Sharkey	SD-C401-CDP25-534 – Julie Keane
SD-C401-CDP25-539 – emilian dackiewicz	SD-C401-CDP25-540 – Karen Roberts Roberts	SD-C401-CDP25-542 – Claire Heffernan
SD-C401-CDP25-543 – Ciaran Byrne	SD-C401-CDP25-552 – Ruth Meehan	SD-C401-CDP25-557 – Derek McGlynn
SD-C401-CDP25-558 – Kevin Fitzgerald	SD-C401-CDP25-561 – Frank Hynes	SD-C401-CDP25-563 – Neasa O'Rourke
SD-C401-CDP25-564 – JOAN FINLAN	SD-C401-CDP25-565 – Laura Woods	SD-C401-CDP25-568 – David Carroll
SD-C401-CDP25-572 – Eilish O'Gorman	SD-C401-CDP25-573 – Erica Gallagher	SD-C401-CDP25-576 – Magda Ghanim

SD-C401-CDP25-578 – John O'Connor	SD-C401-CDP25-579 – Stuart Colohan	SD-C401-CDP25-581 – Mark Peard
SD-C401-CDP25-583 – Kieran Fitzgerald	SD-C401-CDP25-585 – Finnian Ward	SD-C401-CDP25-590 – Raymond blairsdale
SD-C401-CDP25-594 – Rupert Fuller	SD-C401-CDP25-597 – Julie Edwards	SD-C401-CDP25-598 – Darren Kenny
SD-C401-CDP25-599 – Ann Somers	SD-C401-CDP25-600 – Valeria Luciane Okano Halila	SD-C401-CDP25-601 – Hayley McLoughlin
SD-C401-CDP25-602 – Seán Morrissey	SD-C401-CDP25-603 – Loe Antonio de Souza Lobo	SD-C401-CDP25-606 – Mark Gannon
SD-C401-CDP25-607 – Fix-Assist Limited	SD-C401-CDP25-608 – Niall Carroll	SD-C401-CDP25-609 – Niamh Power
SD-C401-CDP25-610 – Martin Boland	SD-C401-CDP25-616 – Denise Carroll	SD-C401-CDP25-617 – Trevor Phelan
SD-C401-CDP25-619 – Dermot Finch	SD-C401-CDP25-620 – Shane Mc Garry	SD-C401-CDP25-623 – Sarah Regan
SD-C401-CDP25-624 – Paul Dunphy	SD-C401-CDP25-625 – Kevin Murtagh	SD-C401-CDP25-626 – Brigetta Connolly
SD-C401-CDP25-627 – Siobhan Casey	SD-C401-CDP25-630 – Elizabeth Quinn	SD-C401-CDP25-631 – Ruairi Quinn
SD-C401-CDP25-632 – Joseph Gavin	SD-C401-CDP25-639 – Strawberry Beds Residents Association	SD-C401-CDP25-641 – Miriam Gavin
SD-C401-CDP25-642 – Sinéad Mcintyre	SD-C401-CDP25-644 – Grace Carey	SD-C401-CDP25-648 – Diane Grogan

SD-C401-CDP25-649 – Westbury Court Residents Association	SD-C401-CDP25-652 – Catherine ross	SD-C401-CDP25-653 – Sarah Ann Mulqueen
SD-C401-CDP25-654 – Sean Foley	SD-C401-CDP25-655 – Rosemary Fair	SD-C401-CDP25-656 – Nora Neville
SD-C401-CDP25-659 – Sean Dowling	SD-C401-CDP25-660 – Paddy Mulhern	SD-C401-CDP25-661 – Geraldine Walsh
SD-C401-CDP25-662 – Kieran Hallinan Hallinan	SD-C401-CDP25-663 – Deirdre Dowling	SD-C401-CDP25-665 – Joe Murphy
SD-C401-CDP25-666 – Linda Ffrench	SD-C401-CDP25-670 – Ross Boxshall	SD-C401-CDP25-671 – Conor Doyle
SD-C401-CDP25-672 – Peter Anderson	SD-C401-CDP25-674 – Sinead Donnelly	SD-C401-CDP25-675 – Emma Conway
SD-C401-CDP25-676 – jean lawlor	SD-C401-CDP25-677 – Catherine Sullivan	SD-C401-CDP25-678 – Brendan Sweeney
SD-C401-CDP25-679 – Joanne O'Flynn	SD-C401-CDP25-680 – Anthony Nolan	SD-C401-CDP25-681 – Suzanne Doyle
SD-C401-CDP25-682 – Catherine Dardis	SD-C401-CDP25-683 – Paul Douglas	SD-C401-CDP25-684 – Davina Monahan
SD-C401-CDP25-685 – Ronan Brannigan	SD-C401-CDP25-686 – Colm Doyle	SD-C401-CDP25-687 – Esther Monahan
SD-C401-CDP25-688 – Andrew Tully	SD-C401-CDP25-690 – eric neville	SD-C401-CDP25-693 – Naomi Anderson
SD-C401-CDP25-694 – Joe Croke	SD-C401-CDP25-695 – Sharon Holland	SD-C401-CDP25-699 – Veronica McCallum

SD-C401-CDP25-702 – Eileen Dennehy	SD-C401-CDP25-704 – Lucy Jordan	SD-C401-CDP25-705 – Aidan Mills
SD-C401-CDP25-710 – Fiona Griffin	SD-C401-CDP25-711 – Catherine O' Donnell	SD-C401-CDP25-712 – Neil Homan
SD-C401-CDP25-713 – John O'Donnell	SD-C401-CDP25-715 – Peter McCabe	SD-C401-CDP25-716 – Christopher Devaney
SD-C401-CDP25-718 – Mary McCabe	SD-C401-CDP25-719 – Viona Sheppard	SD-C401-CDP25-720 – Sophie Dennehy
SD-C401-CDP25-721 – Philip Dennehy	SD-C401-CDP25-723 – Norman Carroll	SD-C401-CDP25-724 – Louise Devlin
SD-C401-CDP25-725 – Norman Carroll	SD-C401-CDP25-728 – Murray Nolan	SD-C401-CDP25-730 – Riain Murphy
SD-C401-CDP25-735 – Bernie Murtagh	SD-C401-CDP25-736 – Antoinette Griffin	SD-C401-CDP25-738 – Sile Tavey
SD-C401-CDP25-739 – Sile Tavey	SD-C401-CDP25-740 – Ann Nealon	SD-C401-CDP25-741 – Fergus Carey
SD-C401-CDP25-743 – Paula McMahon	SD-C401-CDP25-745 – Ballydowd Residents' Association	SD-C401-CDP25-746 – John Paul Tuohy
SD-C401-CDP25-747 – Catherine Carey	SD-C401-CDP25-749 – Jack Henry	SD-C401-CDP25-750 – Pauline Bligh
SD-C401-CDP25-751 – Mary Anderson	SD-C401-CDP25-752 – Yvonne Melinn	SD-C401-CDP25-753 – Joseph Bligh
SD-C401-CDP25-754 – Marie McKeon	SD-C401-CDP25-755 – Fiona Lee	SD-C401-CDP25-756 – Pádraic Slavin
SD-C401-CDP25-757 – Liam Russell	SD-C401-CDP25-758 – Alice Whyte	SD-C401-CDP25-761 – Yvonne Brannigan
SD-C401-CDP25-762 – Andrea Waide	SD-C401-CDP25-763 – Gavin Kelly	SD-C401-CDP25-767 – Helen Carbery

SD-C401-CDP25-768 – Joanne Carolan	SD-C401-CDP25-776 – Mary Whittle	SD-C401-CDP25-777 – Little Folk Preschool
SD-C401-CDP25-779 – Stephanie Monaghan	SD-C401-CDP25-780 – Ann Grimes	SD-C401-CDP25-783 – Sarah Owen
SD-C401-CDP25-785 – Susan Brophy	SD-C401-CDP25-791 – Evelyn O'Brien	SD-C401-CDP25-792 – Sarah Moore
SD-C401-CDP25-798 – Tommy Cartwright	SD-C401-CDP25-800 – Ann Cartwright	SD-C401-CDP25-802 – John Fitzgerald
SD-C401-CDP25-803 – Darragh Henry	SD-C401-CDP25-804 – Vivienne Flynn	SD-C401-CDP25-805 – Ruth Argue
SD-C401-CDP25-806 – PAUL MELINN	SD-C401-CDP25-808 – Imelda Higgins	SD-C401-CDP25-809 – Cllr Trevor Gilligan PC
SD-C401-CDP25-810 – Deirdre Galvin	SD-C401-CDP25-814 – Margaret Doyle	SD-C401-CDP25-818 – Niall Hickey
SD-C401-CDP25-823 – Laura Brophy	SD-C401-CDP25-824 – Stephen Price	SD-C401-CDP25-825 – Jennifer Merriman
SD-C401-CDP25-826 – Niamh Bell	SD-C401-CDP25-827 – Rosemary Corkery	SD-C401-CDP25-828 – Marie Keogh
SD-C401-CDP25-829 – Alan Scullion	SD-C401-CDP25-831 – Teresa Cooney	SD-C401-CDP25-833 – alan byrne
SD-C401-CDP25-834 – A FARRELL	SD-C401-CDP25-836 – Marie O'Reilly	SD-C401-CDP25-837 – Ken Goodwin
SD-C401-CDP25-838 – Ray Barnes	SD-C401-CDP25-839 – Basil Hudson	SD-C401-CDP25-841 – David Kilgannon

SD-C401-CDP25-843 – andrew duff	SD-C401-CDP25-844 – Gillian Doyle	SD-C401-CDP25-846 – Lynn Redmond Redmond
SD-C401-CDP25-847 – Grace Lavery O'Reilly	SD-C401-CDP25-848 – Eithne Richardson	SD-C401-CDP25-849 – Adrienne Sullivan
SD-C401-CDP25-850 – Carleen Stringer	SD-C401-CDP25-861 – Virginia Dooley	SD-C401-CDP25-862 – Adrienne McGee
SD-C401-CDP25-863 – Liffey Salmon Project	SD-C401-CDP25-864 – Alan Breen	SD-C401-CDP25-865 – Adrian Thompson
SD-C401-CDP25-866 – Tom Sweeney Sweeney	SD-C401-CDP25-867 – Patrick O'BRIEN	SD-C401-CDP25-868 – RITA CROKE
SD-C401-CDP25-869 – Jennifer Martin	SD-C401-CDP25-870 – Maria McKiernan	SD-C401-CDP25-876 – Eve Doyle
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-879 – Gemma Collins	SD-C401-CDP25-880 – Brian Dooley
SD-C401-CDP25-882 – Cormac O'Brien	SD-C401-CDP25-883 – Eoin McDonagh	SD-C401-CDP25-884 – Dermot Keogh
SD-C401-CDP25-887 – Nina Healy	SD-C401-CDP25-891 – Ann Hynes	SD-C401-CDP25-895 – Heather Hallinan
SD-C401-CDP25-897 – Mark Lester	SD-C401-CDP25-899 – Fiona Balfe	SD-C401-CDP25-900 – Mary J Nolan
SD-C401-CDP25-901 – Carol Lester	SD-C401-CDP25-903 – Anne Marie Brady	SD-C401-CDP25-906 – Brendan Hanley
SD-C401-CDP25-907 – Marie O'Malley	SD-C401-CDP25-909 – Ciara Mchugh	SD-C401-CDP25-912 – glenn roche

SD-C401-CDP25-915 – Cronan Dooley	SD-C401-CDP25-916 – Lisa Heery	SD-C401-CDP25-919 – Galina Gamija Gamija
SD-C401-CDP25-922 – Melissa Quinn	SD-C401-CDP25-924 – Helen O'Shea	SD-C401-CDP25-925 – Anna Devereux
SD-C401-CDP25-928 – Ruth Beasley	SD-C401-CDP25-930 – G Casey	SD-C401-CDP25-931 – Pat OKeeffe
SD-C401-CDP25-932 – Sarah Downes	SD-C401-CDP25-934 – Aileen Coughlan	SD-C401-CDP25-935 – Julie Kelly
SD-C401-CDP25-936 – Leon Donovan	SD-C401-CDP25-937 – Brian Carroll	SD-C401-CDP25-942 – Fiachra McGrath
SD-C401-CDP25-949 – Marian Henry	SD-C401-CDP25-951 – Liz McMahon	SD-C401-CDP25-955 – Mariana Calderon
SD-C401-CDP25-956 – Jennifer Begley	SD-C401-CDP25-958 – Beata Tuohy Tuohy	SD-C401-CDP25-959 – Colette Twomey
SD-C401-CDP25-960 – Gerard Kelly Anderson	SD-C401-CDP25-962 – Siobhan Brannigan	SD-C401-CDP25-966 – Jill Meredith
SD-C401-CDP25-968 – Matt Lavery-O'Reilly	SD-C401-CDP25-969 – Dermot McGreal	SD-C401-CDP25-978 – Grainne Henry
SD-C401-CDP25-979 – Brian Foley	SD-C401-CDP25-984 – Garvan Ware	SD-C401-CDP25-985 – Ciaran Byrne
SD-C401-CDP25-990 – Ciaran Byrne	SD-C401-CDP25-993 – Ciaran Byrne	SD-C401-CDP25-994 – Ciaran Byrne
SD-C401-CDP25-997 – Philip & Claire Bowler	SD-C401-CDP25-999 – John `Corkery	SD-C401-CDP25-1002 – Martin McHugh

SD-C401-CDP25-1004 – Rita O'connor O'connor	SD-C401-CDP25-1008 – P Tavares	SD-C401-CDP25-1010 – Hilda Staunton
SD-C401-CDP25-1011 – Colin Nicolson	SD-C401-CDP25-1012 – Aine Maher	SD-C401-CDP25-1015 – Fiona Ferguson
SD-C401-CDP25-1016 – S Oconnell	SD-C401-CDP25-1019 – Nicola Meneses	SD-C401-CDP25-1020 – Anne Connaughton
SD-C401-CDP25-1021 – Barry Kennedy	SD-C401-CDP25-1022 – Carmel Griffin	SD-C401-CDP25-1024 – John J Mc Nally
SD-C401-CDP25-1025 – Sarah Mulryan	SD-C401-CDP25-1026 – James Twomey	SD-C401-CDP25-1029 – Carol Dunne
SD-C401-CDP25-1030 – Catriona Montgomery	SD-C401-CDP25-1031 – Timothy Fitzgibbon	SD-C401-CDP25-1032 – Paul Fahey
SD-C401-CDP25-1033 – Andrea Fitzgibbon	SD-C401-CDP25-1035 – Yvonne Costello	SD-C401-CDP25-1036 – Lynn Barron
SD-C401-CDP25-1038 – Colin Mulligan	SD-C401-CDP25-1039 – Úna Mulligan	SD-C401-CDP25-1040 – Mairead Morgan
SD-C401-CDP25-1044 – Patricia McCabe	SD-C401-CDP25-1045 – Mark Lombard	SD-C401-CDP25-1047 – Claire Dorgan
SD-C401-CDP25-1050 – Aileen Ennis	SD-C401-CDP25-1051 – Padraig Ryan	SD-C401-CDP25-1053 – Mary Davis
SD-C401-CDP25-1055 – Fiona Wallace	SD-C401-CDP25-1057 – Elaine O'	SD-C401-CDP25-1058 – Ram Vellore

SD-C401-CDP25-1059 – Adithya Malolan Pathanki	SD-C401-CDP25-1060 – Louise Byrne	SD-C401-CDP25-1061 – Noreen Carolan
SD-C401-CDP25-1062 – Shankar Getty	SD-C401-CDP25-1064 – Mary Jenkins	SD-C401-CDP25-1065 – Patrick Gunning
SD-C401-CDP25-1066 – Stephanie O'Connor	SD-C401-CDP25-1075 – Catriona Graham	SD-C401-CDP25-1077 – AIMEE AHERN
SD-C401-CDP25-1078 – Clive Dempsey	SD-C401-CDP25-1079 – Orla Duke	SD-C401-CDP25-1081 – Vincent O'Connor
SD-C401-CDP25-1082 – Michelle Callanan	SD-C401-CDP25-1088 – Una Duke	SD-C401-CDP25-1090 – Donna Leonard
SD-C401-CDP25-1092 – Michael Lynch	SD-C401-CDP25-1094 – Deborah Mahon	SD-C401-CDP25-1096 – Richard Varney
SD-C401-CDP25-1097 – Tara O'Connell	SD-C401-CDP25-1098 – Kellie de Lacy	SD-C401-CDP25-1099 – Colette Henry
SD-C401-CDP25-1100 – Mary Louise Conroy	SD-C401-CDP25-1101 – Rodney Cromer	SD-C401-CDP25-1102 – Robyn Brady
SD-C401-CDP25-1103 – Andrew Keogh	SD-C401-CDP25-1107 – John Sheehan	SD-C401-CDP25-1108 – Katherina McGarty
SD-C401-CDP25-1109 – Bernadette Curtis	SD-C401-CDP25-1110 – Lucan Tidy Towns	SD-C401-CDP25-1111 – Ronan Duke
SD-C401-CDP25-1114 – Chris ORourke	SD-C401-CDP25-1115 – Maria O'Reilly	SD-C401-CDP25-1116 – Nicola Kearns

SD-C401-CDP25-1117 – Megan Fox	SD-C401-CDP25-1118 – Anita Cahill	SD-C401-CDP25-1119 – Marie Eccles
SD-C401-CDP25-1121 – Ruth Tormey	SD-C401-CDP25-1122 – Mary Kilbane	SD-C401-CDP25-1124 – Christine Tuohy Hopkins
SD-C401-CDP25-1126 – Shane Henry	SD-C401-CDP25-1129 – Tony Tormey	SD-C401-CDP25-1133 – Thomas Campos
SD-C401-CDP25-1134 – Patricia Butler	SD-C401-CDP25-1135 – Frank McGowan	SD-C401-CDP25-1136 – Peter McCallum
SD-C401-CDP25-1141 – Mary J Nolan	SD-C401-CDP25-1144 – Michael Haynes	SD-C401-CDP25-1146 – Louise Brogan
SD-C401-CDP25-1153 – Aileen Blackwell Kelly	SD-C401-CDP25-1158 – Rebecca Ryan	SD-C401-CDP25-1159 – David Whittle
SD-C401-CDP25-1163 – valerie ennis	SD-C401-CDP25-1164 – Cathy Coburn	SD-C401-CDP25-1167 – Inland Fisheries Ireland
SD-C401-CDP25-1169 – Tina Brady	SD-C401-CDP25-1170 – Patricia Murphy	SD-C401-CDP25-1171 – Ricardo Manaia
SD-C401-CDP25-1172 – Anthony McMahon	SD-C401-CDP25-1173 – Tina Dwyer	SD-C401-CDP25-1174 – Aine Maguire
SD-C401-CDP25-1175 – Keith Tracy	SD-C401-CDP25-1177 – Karen Kent	SD-C401-CDP25-1178 – Alecia McSweeney
SD-C401-CDP25-1180 – Aoife Bradley	SD-C401-CDP25-1181 – Alfonso Mauriño Lobatón	SD-C401-CDP25-1185 – Ann Colohan

SD-C401-CDP25-1187 – Local Resident	SD-C401-CDP25-1190 – Chandrasekar Chinnathambi	SD-C401-CDP25-1192 – William Lavelle
SD-C401-CDP25-1194 – Ciara Tully	SD-C401-CDP25-1196 – Brendan Keenan	SD-C401-CDP25-1198 – PATRICIA HARAN
SD-C401-CDP25-1199 – Nicole Broderick	SD-C401-CDP25-1201 – Christine Begg	SD-C401-CDP25-1202 – Celine Kiernan
SD-C401-CDP25-1203 – Damien Enright	SD-C401-CDP25-1205 – Declan Dunne	SD-C401-CDP25-1208 – Ann Dunne
SD-C401-CDP25-1210 – Louise Carthy	SD-C401-CDP25-1211 – Niall Kelly	SD-C401-CDP25-1212 – David Thomas
SD-C401-CDP25-1214 – Andrew Dunne	SD-C401-CDP25-1215 – Tony Marnell	SD-C401-CDP25-1217 – Barry Aird
SD-C401-CDP25-1219 – Denis Twohig	SD-C401-CDP25-1222 – Devin Thomas	SD-C401-CDP25-1225 – Mary Teresa Brien
SD-C401-CDP25-1226 – Mary Nevin	SD-C401-CDP25-1228 – Colm Kelly	SD-C401-CDP25-1229 – Edward Phelan
SD-C401-CDP25-1233 – Sarah Casey	SD-C401-CDP25-1235 – Jim Moore	SD-C401-CDP25-1236 – Colin Mc Kiernan
SD-C401-CDP25-1239 – Cllr. Helen Farrell	SD-C401-CDP25-1240 – Katherine Thomas	SD-C401-CDP25-1242 – Karen Devenney Devenney
SD-C401-CDP25-1243 – Eimear Flynn	SD-C401-CDP25-1245 – Kathleen Thomas	SD-C401-CDP25-1246 – Deborah kiernan

SD-C401-CDP25-1248 – Mark McInerney	SD-C401-CDP25-1250 – Grainne Lamon	SD-C401-CDP25-1254 – Lynsey Dunne
SD-C401-CDP25-1255 – Patrick Galvin	SD-C401-CDP25-1257 – Anne-Marie Flynn	SD-C401-CDP25-1258 – Alan O'Neill
SD-C401-CDP25-1259 – Jerry Lane	SD-C401-CDP25-1260 – David Kinsella	SD-C401-CDP25-1261 – Blathnaid Phelan
SD-C401-CDP25-1262 – Pauline McCormack McCormack	SD-C401-CDP25-1263 – Marie Doolan	SD-C401-CDP25-1264 – Kevin Carroll
SD-C401-CDP25-1266 – Lara Phelan	SD-C401-CDP25-1268 – Peter Carroll	SD-C401-CDP25-1269 – Deirdre McIntyre
SD-C401-CDP25-1270 – Marcel Notenboom	SD-C401-CDP25-1271 – Karen Kinsella	SD-C401-CDP25-1273 – Edward Thomas
SD-C401-CDP25-1274 – Sinéad Ivory	SD-C401-CDP25-1276 – Irene Murphy	SD-C401-CDP25-1277 – Neil Harte
SD-C401-CDP25-1278 – Lauren Alexander	SD-C401-CDP25-1279 – Colette O'Sullivan	SD-C401-CDP25-1281 – Annmarie Quinn
SD-C401-CDP25-1282 – Martha Young	SD-C401-CDP25-1286 – Gavin Lynch	SD-C401-CDP25-1287 – Sharon Ruane
SD-C401-CDP25-1288 – Mairead Lawlor	SD-C401-CDP25-1291 – Ronan N	SD-C401-CDP25-1295 – Conal Cassidy
SD-C401-CDP25-1296 – Claire Joyce	SD-C401-CDP25-1297 – Audrey Smith	SD-C401-CDP25-1301 – Caoimhe Ní Chonchúir

SD-C401-CDP25-1305 – Geraldine Lavin	SD-C401-CDP25-1309 – Owen Ward	SD-C401-CDP25-1313 – Yvonne O Sullivan
SD-C401-CDP25-1314 – Miriam Whittle	SD-C401-CDP25-1315 – E.M Hurley	SD-C401-CDP25-1316 – Jean Mc Carthy
SD-C401-CDP25-1317 – Grace Lombard	SD-C401-CDP25-1318 – Bridin O' Connor	SD-C401-CDP25-1319 – Gabriel Bruton
SD-C401-CDP25-1320 – Ali Dunne	SD-C401-CDP25-1322 – Peter Thimas	SD-C401-CDP25-1323 – Anom ymous
SD-C401-CDP25-1324 – Lesley Jenkins	SD-C401-CDP25-1325 – Siobhan Nolan	SD-C401-CDP25-1329 – Michelle Whelan
SD-C401-CDP25-1333 – Dermot Kelly	SD-C401-CDP25-1335 – Darren Roddy	SD-C401-CDP25-1345 – Aileen Walsh
SD-C401-CDP25-1346 – Alan Dunning	SD-C401-CDP25-1347 – Siobhan Dowling	SD-C401-CDP25-1352 – Caroline O'Brien
SD-C401-CDP25-1353 – Anne Hunston	SD-C401-CDP25-1354 – Katie Moore	SD-C401-CDP25-1355 – Michelle McDermott
SD-C401-CDP25-1356 – Alan Lindsay	SD-C401-CDP25-1357 – Elizabeth O’Neill	SD-C401-CDP25-1359 – Elizabeth Cuddy
SD-C401-CDP25-1364 – Donna Manning	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1366 – Lilian Harris
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1378 – Kenny's of Lucan	SD-C401-CDP25-1379 – Jude O'Loughlin
SD-C401-CDP25-1380 – Aoife Slattery	SD-C401-CDP25-1382 – Mark Walsh	SD-C401-CDP25-1383 – Anna Murphy

SD-C401-CDP25-1384 – Grainne Slattery	SD-C401-CDP25-1387 – Sinead Fitton	SD-C401-CDP25-1391 – Audrey Murray Murray Murray
SD-C401-CDP25-1394 – Lynn Redmond Redmond	SD-C401-CDP25-1396 – Liz Pratt	SD-C401-CDP25-1402 – Máire Ní Fhearraigh
SD-C401-CDP25-1404 – Cyclist	SD-C401-CDP25-1405 – Derek Porter	SD-C401-CDP25-1407 – Henry Cannon
SD-C401-CDP25-1410 – Evan Lombard	SD-C401-CDP25-1411 – Patricia Dwyer	SD-C401-CDP25-1412 – Elaine Collins Collins
SD-C401-CDP25-1415 – Neil Kelly	SD-C401-CDP25-1416 – Thomas Henry	SD-C401-CDP25-1419 – Stephanie O'Connor
SD-C401-CDP25-1422 – Suzanne Murphy	SD-C401-CDP25-1424 – Janet Nelson	SD-C401-CDP25-1426 – Jack O'Sullivan
SD-C401-CDP25-1428 – Kevin Sheehan	SD-C401-CDP25-1429 – John Bird	SD-C401-CDP25-1431 – Thomas Doolan
SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1436 – Frank McGowan	SD-C401-CDP25-1437 – Lee Pêgas
SD-C401-CDP25-1438 – Ganga Kodishala	SD-C401-CDP25-1439 – Susan Staunton	SD-C401-CDP25-1441 – Susan Staunton
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1444 – Veronica Lynam
SD-C401-CDP25-1445 – Mary Grant	SD-C401-CDP25-1448 – Dolores Aird	SD-C401-CDP25-1449 – Marie Murphy

SD-C401-CDP25-1450 – Edina Almasi	SD-C401-CDP25-1453 – Frank Vaughan	SD-C401-CDP25-1454 – Martin Kelly
SD-C401-CDP25-1456 – Donal Curran	SD-C401-CDP25-1458 – Ferdinand van Aesch	SD-C401-CDP25-1462 – Tessa Curran
SD-C401-CDP25-1465 – Tom Farrell	SD-C401-CDP25-1466 – Ariane Hannon	SD-C401-CDP25-1475 – Patrick Brodie
SD-C401-CDP25-1477 – Liam Aird	SD-C401-CDP25-1481 – Senan Farrell	SD-C401-CDP25-1484 – Elizabeth Nolan
SD-C401-CDP25-1490 – Matthew P O Donovan Snr	SD-C401-CDP25-1495 – Darren Nolan	SD-C401-CDP25-1497 – Sarah Galvin
SD-C401-CDP25-1499 – Dorothy Timmons	SD-C401-CDP25-1502 – daa	SD-C401-CDP25-1503 – Margaret Keane
SD-C401-CDP25-1504 – Dee Regan	SD-C401-CDP25-1506 – Caoimhe Farrell	SD-C401-CDP25-1507 – Karina ODonnell
SD-C401-CDP25-1509 – Elaine McGillicuddy	SD-C401-CDP25-1510 – Sally Darlington	SD-C401-CDP25-1512 – Julie McMullan
SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1516 – David Henry	SD-C401-CDP25-1521 – Paula Galvin
SD-C401-CDP25-1523 – Kevin Farrell	SD-C401-CDP25-1526 – Michael Coghlan	SD-C401-CDP25-1527 – Donal Walsh
SD-C401-CDP25-1528 – Johanne Monahan	SD-C401-CDP25-1530 – Caoimhe Foy	SD-C401-CDP25-1532 – John Gobbett

SD-C401-CDP25-1535 – Elaine Chapman	SD-C401-CDP25-1537 – Sandra Coleman	SD-C401-CDP25-1540 – Brid Fahey
SD-C401-CDP25-1543 – Rosaleen Murphy	SD-C401-CDP25-1547 – Claire Gallagher	SD-C401-CDP25-1548 – Sinéad Farrell
SD-C401-CDP25-1551 – DAVID CULLEN	SD-C401-CDP25-1554 – Brian Sheehan	SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail
SD-C401-CDP25-1558 – Genevieve Hennessy	SD-C401-CDP25-1560 – Catherine Brangan	SD-C401-CDP25-1567 – Jennifer Tierney
SD-C401-CDP25-1568 – Gary Conlon	SD-C401-CDP25-1571 – Eimear kennedy	SD-C401-CDP25-1575 – Christina van Aesch
SD-C401-CDP25-1580 – Edel Mooney	SD-C401-CDP25-1584 – Luke Heffernan	SD-C401-CDP25-1587 – Breda Connolly
SD-C401-CDP25-1589 – An Claíomh Glas & Lucan Planning Council	SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1593 – Derek Glynn
SD-C401-CDP25-1594 – Sara Feeney	SD-C401-CDP25-1595 – Bridie and Eamonn Nestor	SD-C401-CDP25-1597 – Cllr Vicki Casserly
SD-C401-CDP25-1599 – Gabriel McKeon	SD-C401-CDP25-1600 – Agnieszka Trzos	SD-C401-CDP25-1603 – John Devaney
SD-C401-CDP25-1606 – Eamon Tuffy	SD-C401-CDP25-1609 – Arvind Devalla	SD-C401-CDP25-1610 – John O'Connor

SD-C401-CDP25-1611 – Maria Pender	SD-C401-CDP25-1612 – Raymond Conlon	SD-C401-CDP25-1618 – Paddy Keating
SD-C401-CDP25-1619 – Darragh Begley	SD-C401-CDP25-1620 – Bhawna Rana	SD-C401-CDP25-1622 – Susan Phelan
SD-C401-CDP25-1624 – I Mc Cabe	SD-C401-CDP25-1627 – Orla Cunningham	SD-C401-CDP25-1631 – Caroline Belton
SD-C401-CDP25-1632 – Alyssa Gilmore	SD-C401-CDP25-1633 – Grace OShea	SD-C401-CDP25-1636 – Maria Guerriero
SD-C401-CDP25-1638 – Cormac Phelan	SD-C401-CDP25-1639 – Carmel Callaghan	SD-C401-CDP25-1641 – Thomas Callaghan
SD-C401-CDP25-1643 – Tara Ryan	SD-C401-CDP25-1644 – Rebecca Galvin	SD-C401-CDP25-1649 – Frank O'Leary
SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1656 – Laura Breslin	SD-C401-CDP25-1657 – Sean Breslin
SD-C401-CDP25-1666 – Shane Moynihan TD	SD-C401-CDP25-1668 – Gerard Jenkins	SD-C401-CDP25-1669 – Damien Moloney
SD-C401-CDP25-1675 – Bernie Stapleton	SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1680 – Natalia Kublova
SD-C401-CDP25-1682 – Michael Boyle	SD-C401-CDP25-1688 – Caroline Carney	SD-C401-CDP25-1689 – Leonard Skelly

SD-C401-CDP25-1692 – Nessa Boyle	SD-C401-CDP25-1694 – Imogen Murphy	SD-C401-CDP25-1696 – Lisa Donnelly
SD-C401-CDP25-1697 – Orla O Shea	SD-C401-CDP25-1700 – STANLEY PAUL BLESSING WILLIAM	SD-C401-CDP25-1703 – Eamon O'Maolchaoin
SD-C401-CDP25-1706 – Maura O'Keeffe	SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1710 – Ruth Curran
SD-C401-CDP25-1711 – Robert Nelson	SD-C401-CDP25-1712 – Niall Roche	SD-C401-CDP25-1715 – Maria Murphy
SD-C401-CDP25-1722 – Patricia Mac Manus	SD-C401-CDP25-1724 – MICHAEL MC GRATH	SD-C401-CDP25-1725 – Department of Education and Youth
SD-C401-CDP25-1731 – CLAIRE MURPHY	SD-C401-CDP25-1735 – Hannah Murphy	SD-C401-CDP25-1737 – John Bird
SD-C401-CDP25-1738 – Aislinn Shaw	SD-C401-CDP25-1745 – Sarah Murphy	SD-C401-CDP25-1752 – John McGivney
SD-C401-CDP25-1753 – Ben Healy	SD-C401-CDP25-1756 – Robert OConnell	SD-C401-CDP25-1757 – Clarissa Dalton
SD-C401-CDP25-1758 – Janice O'Brien	SD-C401-CDP25-1759 – Kenneth Lavin	SD-C401-CDP25-1760 – Laura Doyle
SD-C401-CDP25-1763 – McDonald Property	SD-C401-CDP25-1764 – Aoife Borland	SD-C401-CDP25-1767 – Ann-Marie Nolan
SD-C401-CDP25-1769 – Niamh Spillane	SD-C401-CDP25-1770 – Darren Stephenson	SD-C401-CDP25-1771 – Margaret Byrne

SD-C401-CDP25-1772 – Philip Curran	SD-C401-CDP25-1774 – PAUL HOULIHAN	SD-C401-CDP25-1775 – Shauna Murphy-Farrell
SD-C401-CDP25-1780 – Ellen Downes	SD-C401-CDP25-1781 – Penelope Duff	SD-C401-CDP25-1782 – Christy Byrne
SD-C401-CDP25-1783 – tONYQ O'Sullivan	SD-C401-CDP25-1784 – Marie O'Sullivan	SD-C401-CDP25-1785 – Josephine Carey
SD-C401-CDP25-1786 – Mary Rudden	SD-C401-CDP25-1787 – Anne Beales	SD-C401-CDP25-1788 – P Harding
SD-C401-CDP25-1789 – M Harding	SD-C401-CDP25-1790 – Daniel Kennedy	SD-C401-CDP25-1791 – Mark Carolan
SD-C401-CDP25-1792 – Teresa Duggan	SD-C401-CDP25-1793 – John Carolan	SD-C401-CDP25-1794 – Ann Jordan
SD-C401-CDP25-1795 – Ellie Jordan	SD-C401-CDP25-1796 – Niall Jordan	SD-C401-CDP25-1797 – Maria Stephens
SD-C401-CDP25-1798 – James O' Toole	SD-C401-CDP25-1799 – Gillian Doyle	SD-C401-CDP25-1800 – Anne Graham
SD-C401-CDP25-1801 – Eddie Longworth	SD-C401-CDP25-1804 – aNN Byrne	SD-C401-CDP25-1805 – Aoibhinn Doyle
SD-C401-CDP25-1806 – Irene Byrne	SD-C401-CDP25-1807 – Matthew Allen	SD-C401-CDP25-1808 – Aisling Morris
SD-C401-CDP25-1809 – Geraldine Doyle	SD-C401-CDP25-1810 – Deirdre Byrne	SD-C401-CDP25-1811 – Teresa Halloran
SD-C401-CDP25-1812 – Sebastian Fruend	SD-C401-CDP25-1813 – Ann Condon	SD-C401-CDP25-1814 – Mia Fulton

SD-C401-CDP25-1815 – Gleidy Santos	SD-C401-CDP25-1816 – Hannah Condon	SD-C401-CDP25-1817 – Laura Condon
SD-C401-CDP25-1818 – Catalin Briscaru	SD-C401-CDP25-1819 – Clare Downes	SD-C401-CDP25-1820 – Rhona Downes
SD-C401-CDP25-1821 – Simon Condon	SD-C401-CDP25-1822 – Amy `Callaghan	SD-C401-CDP25-1823 – Margaret O' Reilly
SD-C401-CDP25-1824 – Gabriel Davey	SD-C401-CDP25-1825 – Jennifer Delaney	SD-C401-CDP25-1826 – Ryan O' Flynn
SD-C401-CDP25-1827 – Caroline Carey	SD-C401-CDP25-1828 – Artem N/A	SD-C401-CDP25-1829 – Caroline Nevin
SD-C401-CDP25-1830 – Christophe Pataiorra	SD-C401-CDP25-1831 – Lydia Jupatova	SD-C401-CDP25-1832 – Darren O'Connor
SD-C401-CDP25-1833 – Erica Fitzpatrick	SD-C401-CDP25-1834 – Bolanle Helen	SD-C401-CDP25-1835 – Roslyn O' Ginis
SD-C401-CDP25-1836 – Amanda Carroll	SD-C401-CDP25-1837 – Anne Marie Smith	SD-C401-CDP25-1838 – Gillian O'Reilly
SD-C401-CDP25-1839 – Orla Hogan	SD-C401-CDP25-1840 – fIONA Slaughter	SD-C401-CDP25-1841 – Jack Kelly
SD-C401-CDP25-1842 – Ellen Eakins	SD-C401-CDP25-1843 – Anthony J fLYNN	SD-C401-CDP25-1844 – Isabel Solan
SD-C401-CDP25-1845 – Anne Keogh	SD-C401-CDP25-1846 – Anne O Connell	SD-C401-CDP25-1847 – Karl Keogh

SD-C401-CDP25-1848 – Jean Taylor	SD-C401-CDP25-1849 – Stephen P	SD-C401-CDP25-1850 – Caoimhin Conneely
SD-C401-CDP25-1851 – patricia Mc Donal	SD-C401-CDP25-1852 – Kathleen Mc Donald	SD-C401-CDP25-1853 – Dexter V L Hunt
SD-C401-CDP25-1854 – Rynagh Beegan	SD-C401-CDP25-1855 – Anne & Aidan Murphy	SD-C401-CDP25-1856 – Sheila Murphy
SD-C401-CDP25-1857 – Ciarán Chew	SD-C401-CDP25-1858 – Edward Chew	SD-C401-CDP25-1859 – Mel Kelvy
SD-C401-CDP25-1860 – Breda Grummey	SD-C401-CDP25-1862 – David Henry	SD-C401-CDP25-1863 – Mary Strickland
SD-C401-CDP25-1864 – Aidan Flemming	SD-C401-CDP25-1865 – Siwead Nandlumar	SD-C401-CDP25-1866 – Nandicumar Nair
SD-C401-CDP25-1867 – Gasbrille Reidy	SD-C401-CDP25-1868 – Emma Mills	SD-C401-CDP25-1869 – Dennis McCarthy
SD-C401-CDP25-1870 – Amanda Carroll	SD-C401-CDP25-1871 – Rachel Cunningham	SD-C401-CDP25-1872 – Louise Heffernan
SD-C401-CDP25-1873 – Sean Cullen	SD-C401-CDP25-1875 – Andrew Murphy	SD-C401-CDP25-1876 – Dympna Mc Hugh
SD-C401-CDP25-1877 – Róisín O Brien	SD-C401-CDP25-1878 – Caoimhe Currie	SD-C401-CDP25-1879 – Billy Mulligan
SD-C401-CDP25-1880 – Vera Sullivan	SD-C401-CDP25-1881 – Paul Williams	SD-C401-CDP25-1882 – John Slacke

SD-C401-CDP25-1883 – Patrick Culloty	SD-C401-CDP25-1884 – Oliver Ganry	SD-C401-CDP25-1885 – Katherine Donegan
SD-C401-CDP25-1886 – Marian O'Donnell Byrne	SD-C401-CDP25-1887 – Alison Kennedy	SD-C401-CDP25-1888 – Carollyn Cullen
SD-C401-CDP25-1889 – Kyna Kennedy	SD-C401-CDP25-1890 – Luke Spollen	SD-C401-CDP25-1891 – Rosalie Quinsey
SD-C401-CDP25-1892 – Avril Mc Entagert	SD-C401-CDP25-1893 – Orla Mc Cormack	SD-C401-CDP25-1894 – Ruairi Mc Entagert
SD-C401-CDP25-1896 – Sean Manley	SD-C401-CDP25-1897 – Anthony Sturgess	SD-C401-CDP25-1898 – Gillian Grant
SD-C401-CDP25-1900 – Danielle Hughes	SD-C401-CDP25-1901 – Zoe Mc Entagert	SD-C401-CDP25-1902 – Vincent Smith
SD-C401-CDP25-1903 – Dermot Duggan	SD-C401-CDP25-1904 – Niall Mulhern	SD-C401-CDP25-1905 – Michael Donnelly
SD-C401-CDP25-1906 – James Mc Greevy	SD-C401-CDP25-1907 – Seán O Conghaile	SD-C401-CDP25-1908 – Nester Formentera
SD-C401-CDP25-1909 – Jason Monahan	SD-C401-CDP25-1910 – Alan Nason	SD-C401-CDP25-1911 – Cian Dwane
SD-C401-CDP25-1912 – Julie Mc Fadden	SD-C401-CDP25-1913 – Orla Mockler	SD-C401-CDP25-1914 – Lilig Chen
SD-C401-CDP25-1915 – Patricia Daly	SD-C401-CDP25-1916 – Neil Lowney	SD-C401-CDP25-1917 – Gerard Seahill

SD-C401-CDP25-1918 – Sylvia Dorigo	SD-C401-CDP25-1919 – Fintan Buckley	SD-C401-CDP25-1920 – Aileen Mills
SD-C401-CDP25-1921 – Alina Gantede	SD-C401-CDP25-1922 – Paula Smith	SD-C401-CDP25-1923 – Julie Monaghan
SD-C401-CDP25-1924 – Marie Mockler	SD-C401-CDP25-1925 – Clodagh Flynn	SD-C401-CDP25-1926 – Norbert Sellek
SD-C401-CDP25-1927 – Shane Casey	SD-C401-CDP25-1928 – Fergal Kyne	SD-C401-CDP25-1929 – Kellie De Lacy
SD-C401-CDP25-1930 – Richard Slater	SD-C401-CDP25-1931 – Darragh Kyne	SD-C401-CDP25-1932 – Matthew Murphy
SD-C401-CDP25-1933 – Antonio Jose	SD-C401-CDP25-1934 – Cara Murphy	SD-C401-CDP25-1935 – Sarah Dillon
SD-C401-CDP25-1936 – Conor Dillon	SD-C401-CDP25-1937 – Suzanne Dillon	SD-C401-CDP25-1938 – Brian Gorman
SD-C401-CDP25-1939 – Catherine Gorman	SD-C401-CDP25-1940 – Erika O' Callaghan	SD-C401-CDP25-1941 – Anthony Murphy
SD-C401-CDP25-1942 – Margaret Doyle	SD-C401-CDP25-1943 – Andrew Duffy	SD-C401-CDP25-1944 – Nuala Geraghty
SD-C401-CDP25-1945 – Carmel King	SD-C401-CDP25-1946 – Philip King	SD-C401-CDP25-1947 – Martin Doran
SD-C401-CDP25-1948 – Nuala Duffy	SD-C401-CDP25-1949 – Desmond Duffy	SD-C401-CDP25-1950 – Mary Porter
SD-C401-CDP25-1951 – Deirdre O Toole	SD-C401-CDP25-1952 – John Parkinson	SD-C401-CDP25-1953 – Jonathan Somens

SD-C401-CDP25-1954 – Kevin Zehner	SD-C401-CDP25-1955 – Yvonne Kelly	SD-C401-CDP25-1956 – Joan Slavin
SD-C401-CDP25-1957 – Raymond Cullen	SD-C401-CDP25-1958 – Billy Hayes	SD-C401-CDP25-1959 – Jonathan Kennedy
SD-C401-CDP25-1960 – Terry Abbott	SD-C401-CDP25-1961 – Andzua N/A	SD-C401-CDP25-1962 – Kevin Doherty
SD-C401-CDP25-1963 – Cathy Abbott	SD-C401-CDP25-1964 – David Porter	SD-C401-CDP25-1965 – Eric Byrne
SD-C401-CDP25-1966 – Martin Doherty	SD-C401-CDP25-1967 – Derek O Brien	SD-C401-CDP25-1968 – Ronan Shiel
SD-C401-CDP25-1969 – Tena Doherty	SD-C401-CDP25-1970 – Jeanine Byrne	SD-C401-CDP25-1971 – Mihaela Duma
SD-C401-CDP25-1972 – Aideen Mc Carthy	SD-C401-CDP25-1973 – Jeff Roche	SD-C401-CDP25-1974 – Allen Mahony
SD-C401-CDP25-1975 – Nigel Buttner	SD-C401-CDP25-1976 – Amy Curtain	SD-C401-CDP25-1977 – Elsa Cavanagh
SD-C401-CDP25-1978 – Suzanne Leyon	SD-C401-CDP25-1979 – Ann Byrne	SD-C401-CDP25-1980 – Fiona Hayden
SD-C401-CDP25-1981 – Anna Campion	SD-C401-CDP25-1982 – Matthew Killalea	SD-C401-CDP25-1983 – Anne O Toole
SD-C401-CDP25-1984 – Ceilin Bramley	SD-C401-CDP25-1985 – Anne Smith	SD-C401-CDP25-1986 – Rebecca Killalea
SD-C401-CDP25-1987 – Anthony Norton	SD-C401-CDP25-1988 – Tessa Sherlock	SD-C401-CDP25-1989 – Aoife Duffy
SD-C401-CDP25-1990 – Aoife Gorman	SD-C401-CDP25-1991 – Philip Smyth	SD-C401-CDP25-1992 – Ryan McCoy

SD-C401-CDP25-1993 – Austin Mc Cartney	SD-C401-CDP25-1994 – Ben Foxall	SD-C401-CDP25-1995 – Clodagh Hickey
SD-C401-CDP25-1996 – Ruairi Paxton	SD-C401-CDP25-1997 – Palia K	SD-C401-CDP25-1998 – Nessa Malone
SD-C401-CDP25-1999 – Rose Isip	SD-C401-CDP25-2000 – Daniusz Yozefowin	SD-C401-CDP25-2001 – Ben O Byrne
SD-C401-CDP25-2002 – Breeda Ward	SD-C401-CDP25-2003 – Janice Walsh	SD-C401-CDP25-2004 – Brian Hardagan
SD-C401-CDP25-2005 – Brian Ward	SD-C401-CDP25-2006 – Aaron Walsh	SD-C401-CDP25-2007 – Carla Ralph
SD-C401-CDP25-2008 – Caroline Peppard	SD-C401-CDP25-2009 – Cathal Gorman	SD-C401-CDP25-2010 – Louise Greene
SD-C401-CDP25-2011 – Catherine Handibode	SD-C401-CDP25-2012 – Alexandra Jozefowicz	SD-C401-CDP25-2013 – Charlotte O Neill
SD-C401-CDP25-2014 – Christina O Grady	SD-C401-CDP25-2015 – Gina Campion	SD-C401-CDP25-2016 – Cian Butler
SD-C401-CDP25-2017 – Damien Leonard	SD-C401-CDP25-2018 – Cian Duffy	SD-C401-CDP25-2019 – Grainne Henry
SD-C401-CDP25-2020 – Karen Kelly	SD-C401-CDP25-2021 – Hetman Velija	SD-C401-CDP25-2022 – Ronan Kyne
SD-C401-CDP25-2023 – James Walker	SD-C401-CDP25-2024 – Bernie Hickey	SD-C401-CDP25-2025 – Darren Kelly
SD-C401-CDP25-2026 – Eugene Isip	SD-C401-CDP25-2027 – Lu Vicktoriia	SD-C401-CDP25-2028 – Anna Dunne

SD-C401-CDP25-2029 – TA Hickey	SD-C401-CDP25-2030 – Conor Meehan	SD-C401-CDP25-2031 – Fergus Gordon
SD-C401-CDP25-2032 – Declan Moore	SD-C401-CDP25-2033 – Anne Maria Coen	SD-C401-CDP25-2034 – Diarmuid Barron
SD-C401-CDP25-2035 – Patrick Mc Garrigle	SD-C401-CDP25-2036 – John Harrington	SD-C401-CDP25-2037 – Catherine Doherty
SD-C401-CDP25-2038 – Lorraine Walsh	SD-C401-CDP25-2039 – Eoghan Bocaer	SD-C401-CDP25-2040 – Giorgia Dorigo
SD-C401-CDP25-2041 – Tracy Denner	SD-C401-CDP25-2042 – Joan Dillon	SD-C401-CDP25-2043 – Simon Cunningham
SD-C401-CDP25-2044 – Pamela Stagg	SD-C401-CDP25-2045 – Emer Cunningham	SD-C401-CDP25-2046 – Sede Halseie
SD-C401-CDP25-2047 – Giuliano Dorigo	SD-C401-CDP25-2048 – Shane Connell	SD-C401-CDP25-2049 – James Monaghan
SD-C401-CDP25-2050 – Margaret Harrington	SD-C401-CDP25-2051 – Declan O Neill	SD-C401-CDP25-2052 – Else O Neill
SD-C401-CDP25-2053 – Frank Darcy	SD-C401-CDP25-2054 – Maura Noone	SD-C401-CDP25-2055 – Marcella Field
SD-C401-CDP25-2056 – Denis Field	SD-C401-CDP25-2057 – Alan Carroll	SD-C401-CDP25-2058 – Evan Carroll
SD-C401-CDP25-2059 – Bevnal Coy	SD-C401-CDP25-2060 – Adrian Mahon	SD-C401-CDP25-2061 – J O' Sullivan
SD-C401-CDP25-2062 – Eoin Connolly	SD-C401-CDP25-2063 – Aideen Fleming	SD-C401-CDP25-2064 – Mary Rose Martin

SD-C401-CDP25-2065 – Mairead Conery	SD-C401-CDP25-2066 – Joan Collins	SD-C401-CDP25-2067 – Helen Kyne
SD-C401-CDP25-2068 – Tommy N	SD-C401-CDP25-2069 – Aidan Leonard	SD-C401-CDP25-2070 – Frank Moore
SD-C401-CDP25-2071 – Aileen Dempsey	SD-C401-CDP25-2072 – Peter Geraty	SD-C401-CDP25-2073 – Aileen O' Donnell
SD-C401-CDP25-2074 – Maire Whelan	SD-C401-CDP25-2075 – Alan Bebbington	SD-C401-CDP25-2076 – Olive Joyce
SD-C401-CDP25-2077 – Aleena Smallwood	SD-C401-CDP25-2078 – Olive McDonagh	SD-C401-CDP25-2079 – Alex Tracey
SD-C401-CDP25-2080 – Alexander Tracey	SD-C401-CDP25-2081 – Colm McDonagh	SD-C401-CDP25-2082 – Anthony Byrne
SD-C401-CDP25-2083 – Calum Conway	SD-C401-CDP25-2084 – Ann Gordan	SD-C401-CDP25-2085 – Aidan Collen
SD-C401-CDP25-2086 – Caitriona Conway	SD-C401-CDP25-2087 – Diarmuid Conway	SD-C401-CDP25-2088 – Angela McFadden
SD-C401-CDP25-2089 – Ailish O Grady	SD-C401-CDP25-2090 – Eimear Lowry Hayes	SD-C401-CDP25-2091 – Aisling Maxwell
SD-C401-CDP25-2092 – Anne Rowley	SD-C401-CDP25-2093 – Margaret Lowry Hayes	SD-C401-CDP25-2094 – Brendan Hayes

SD-C401-CDP25-2095 – Alan Lynch	SD-C401-CDP25-2096 – Caroline Walsh	SD-C401-CDP25-2097 – Yvonne Creaven
SD-C401-CDP25-2098 – Alan Moore Mary O Reilly	SD-C401-CDP25-2099 – Catherine Henry	SD-C401-CDP25-2100 – Ciara Gallagher
SD-C401-CDP25-2101 – Ciara O Neill	SD-C401-CDP25-2102 – Adriana Varzevicius	SD-C401-CDP25-2103 – Clare Cowley
SD-C401-CDP25-2104 – Cliff Butler	SD-C401-CDP25-2105 – AlisonMark Markey	SD-C401-CDP25-2106 – Amanda Garrett
SD-C401-CDP25-2107 – Andrew McGready	SD-C401-CDP25-2108 – Cliodhna Walsh	SD-C401-CDP25-2109 – Courtney Smith
SD-C401-CDP25-2110 – Craig Duffy	SD-C401-CDP25-2111 – Daniel Heine	SD-C401-CDP25-2112 – Danny Feeney
SD-C401-CDP25-2113 – Dara Donoghue	SD-C401-CDP25-2114 – Amanda Barrett	SD-C401-CDP25-2115 – Andrew Mockler
SD-C401-CDP25-2116 – Bindu Krishnanivas	SD-C401-CDP25-2117 – Angela Jacobson	SD-C401-CDP25-2118 – Bernard Coyne Vivienne Coyne
SD-C401-CDP25-2119 – Breda Tuite	SD-C401-CDP25-2120 – Brian Crummey	SD-C401-CDP25-2121 – Marie Maher
SD-C401-CDP25-2122 – Brian Ryan	SD-C401-CDP25-2123 – Donal Horan	SD-C401-CDP25-2124 – Brigid Mc Evoy
SD-C401-CDP25-2125 – Alex D'Alba	SD-C401-CDP25-2126 – Catherine Doyle	SD-C401-CDP25-2127 – Anika Nagel

SD-C401-CDP25-2128 – B Conneely	SD-C401-CDP25-2129 – Ann Murray	SD-C401-CDP25-2130 – B Bollard
SD-C401-CDP25-2131 – A Another	SD-C401-CDP25-2132 – Geraldine Coogan	SD-C401-CDP25-2133 – Barbara Haslam
SD-C401-CDP25-2134 – Áine Kirwan	SD-C401-CDP25-2135 – Bridget Hurson	SD-C401-CDP25-2136 – Anthony Larkin
SD-C401-CDP25-2137 – Amy De Rouble	SD-C401-CDP25-2138 – Breda Kavanagh	SD-C401-CDP25-2139 – Bláthín Kelly
SD-C401-CDP25-2140 – Bernie Lancaster	SD-C401-CDP25-2141 – Afit Ahalnowalia	SD-C401-CDP25-2142 – Brendan Lally
SD-C401-CDP25-2143 – Catherine Doyle	SD-C401-CDP25-2144 – Brenda Kelly	SD-C401-CDP25-2145 – Catherine Quinn
SD-C401-CDP25-2146 – Ann Condon	SD-C401-CDP25-2147 – Cathleen Daly	SD-C401-CDP25-2148 – Christopher O Toole
SD-C401-CDP25-2149 – Ciara Caldwell	SD-C401-CDP25-2150 – Brendan Nestor	SD-C401-CDP25-2151 – Ciara Gaffney
SD-C401-CDP25-2152 – Ciara Whelan	SD-C401-CDP25-2153 – Bríd McGrath	SD-C401-CDP25-2154 – Claire Daly
SD-C401-CDP25-2155 – Clare Murphy	SD-C401-CDP25-2156 – Barry O'Hara	SD-C401-CDP25-2157 – Clive Foley
SD-C401-CDP25-2158 – Ben Pirie	SD-C401-CDP25-2159 – Breffin Worrall	SD-C401-CDP25-2160 – Bernadette Hartzenberg
SD-C401-CDP25-2161 – Bill O Kane	SD-C401-CDP25-2162 – Brendan Walsh	SD-C401-CDP25-2163 – Brian Brady

SD-C401-CDP25-2164 – Brian Doyle	SD-C401-CDP25-2165 – Catherine Blanchfield	SD-C401-CDP25-2166 – Colette Brocklebonk
SD-C401-CDP25-2167 – Carlos Carreira	SD-C401-CDP25-2168 – Chloe Cheng	SD-C401-CDP25-2169 – Charlotte Cautley
SD-C401-CDP25-2170 – Anna Cooney	SD-C401-CDP25-2171 – Ann Dillon	SD-C401-CDP25-2172 – Aoife Kennedy
SD-C401-CDP25-2173 – Antonio Sejean	SD-C401-CDP25-2174 – Audrey Gillmartin	SD-C401-CDP25-2175 – A Joyce
SD-C401-CDP25-2176 – Catherine Dunne	SD-C401-CDP25-2177 – Aaron Lamphiere	SD-C401-CDP25-2178 – Anthony Locke
SD-C401-CDP25-2179 – Cantessne Cunningham	SD-C401-CDP25-2180 – Caroline Greco	SD-C401-CDP25-2181 – Aisling Mahoney
SD-C401-CDP25-2182 – Cedru Cheng	SD-C401-CDP25-2183 – Michelle Maguire	SD-C401-CDP25-2184 – Alex Slowey
SD-C401-CDP25-2185 – Bernard Bonroy	SD-C401-CDP25-2186 – Bernadette O'Brien	SD-C401-CDP25-2187 – Carmel Bellew
SD-C401-CDP25-2188 – Emmet Bellew	SD-C401-CDP25-2189 – Emma Byrne	SD-C401-CDP25-2190 – Cathal Greene
SD-C401-CDP25-2191 – Elaine Caraway	SD-C401-CDP25-2192 – Caitríona Jones	SD-C401-CDP25-2193 – Emer Cartwright
SD-C401-CDP25-2194 – Eileen Collins	SD-C401-CDP25-2195 – Alex Tierney	SD-C401-CDP25-2196 – Claire Kineavy

SD-C401-CDP25-2197 – Ellen Fahy	SD-C401-CDP25-2198 – ÉAIBHÍN Grimes	SD-C401-CDP25-2199 – Caroline Loughnane
SD-C401-CDP25-2200 – Elizabeth Mc Cormack	SD-C401-CDP25-2201 – Ann Woods	SD-C401-CDP25-2202 – Eoin O Toole
SD-C401-CDP25-2203 – Ann Cooke	SD-C401-CDP25-2204 – Eamonn Regan	SD-C401-CDP25-2205 – Christine Tierney
SD-C401-CDP25-2206 – Eimear Reilly	SD-C401-CDP25-2207 – Ciara Massey	SD-C401-CDP25-2208 – Emma Slowey
SD-C401-CDP25-2209 – Ann Gilmore	SD-C401-CDP25-2210 – Cian McCormack	SD-C401-CDP25-2211 – Emma Thompson
SD-C401-CDP25-2212 – Diane Bailey	SD-C401-CDP25-2213 – Cillian Oakes	SD-C401-CDP25-2214 – Ann Kilduff
SD-C401-CDP25-2215 – Dara Byrne	SD-C401-CDP25-2216 – Ann Mulhern	SD-C401-CDP25-2217 – Ciara Sperin
SD-C401-CDP25-2218 – Daniel Christian	SD-C401-CDP25-2219 – Ann Tubbert	SD-C401-CDP25-2220 – Damien Doolan
SD-C401-CDP25-2221 – Deirdre Malone	SD-C401-CDP25-2222 – Darren O Brien	SD-C401-CDP25-2223 – Ann and Brian Joyce
SD-C401-CDP25-2224 – Carmel Flynn	SD-C401-CDP25-2225 – Deirdre Regan	SD-C401-CDP25-2226 – Doney Sebastian
SD-C401-CDP25-2227 – Catherine Diggins	SD-C401-CDP25-2228 – Anne Beattie	SD-C401-CDP25-2229 – Colm Elliott
SD-C401-CDP25-2230 – Anne Bolger	SD-C401-CDP25-2231 – Colm Gaffney	SD-C401-CDP25-2232 – Anne Galvin

SD-C401-CDP25-2233 – Daphne Larragy	SD-C401-CDP25-2234 – Colm O'Driscoll	SD-C401-CDP25-2235 – Darragh Gorman
SD-C401-CDP25-2236 – Conor Walsh	SD-C401-CDP25-2237 – Darren Kelly	SD-C401-CDP25-2238 – David Hargodan Stephanie Hargodan
SD-C401-CDP25-2239 – Cora Hennelly	SD-C401-CDP25-2240 – David Byrne	SD-C401-CDP25-2241 – David Mc Connell
SD-C401-CDP25-2242 – Eoghan Toolan	SD-C401-CDP25-2243 – Anne Hayes	SD-C401-CDP25-2244 – David Mc Gonagle
SD-C401-CDP25-2245 – David Norry	SD-C401-CDP25-2246 – Anne Kryger	SD-C401-CDP25-2247 – Dean Reilly
SD-C401-CDP25-2248 – Declan Curtin	SD-C401-CDP25-2249 – Declan Sherlock	SD-C401-CDP25-2250 – Dee O Byrne
SD-C401-CDP25-2251 – Anne Ryan	SD-C401-CDP25-2252 – Des O Brien	SD-C401-CDP25-2253 – Diarmuid Dawson
SD-C401-CDP25-2254 – Annemarie Gleeson	SD-C401-CDP25-2255 – Dominic Maxwell	SD-C401-CDP25-2256 – Don Dillon
SD-C401-CDP25-2257 – Donal Walshe	SD-C401-CDP25-2258 – Eileen Worrall	SD-C401-CDP25-2259 – Aoibhe Bramley
SD-C401-CDP25-2260 – Dorothea Keane	SD-C401-CDP25-2261 – Eamon Tuffy	SD-C401-CDP25-2262 – Dympna Hudson
SD-C401-CDP25-2263 – Aoibh1nn Fritton	SD-C401-CDP25-2264 – Eamon O'Brien	SD-C401-CDP25-2265 – G O Connor

SD-C401-CDP25-2266 – Gerard Bailey	SD-C401-CDP25-2267 – Gerard Bellew	SD-C401-CDP25-2268 – Edward Duffy
SD-C401-CDP25-2269 – Audrey Pierce	SD-C401-CDP25-2270 – Geraldine Fitzgerald	SD-C401-CDP25-2271 – Faye Redmond
SD-C401-CDP25-2272 – G Gorman	SD-C401-CDP25-2273 – Francis Dillan	SD-C401-CDP25-2274 – Geraldine Heaney
SD-C401-CDP25-2275 – Gillian Lacey	SD-C401-CDP25-2276 – Gillian Mc Cormack	SD-C401-CDP25-2277 – Geraldine Murphy
SD-C401-CDP25-2278 – Flavio Greco	SD-C401-CDP25-2279 – Ger Sejean	SD-C401-CDP25-2280 – Gregory Tierney
SD-C401-CDP25-2281 – Geraldine Cleary	SD-C401-CDP25-2282 – Fainche Grimes	SD-C401-CDP25-2283 – Edward Farrell
SD-C401-CDP25-2284 – Geraldine O Toole	SD-C401-CDP25-2285 – Foinnuala Kirby	SD-C401-CDP25-2286 – Edward McDonagh
SD-C401-CDP25-2287 – Geraldine Tyrrell	SD-C401-CDP25-2288 – Fiona Lee	SD-C401-CDP25-2289 – Gerard Keane
SD-C401-CDP25-2290 – Gerard Mc Loughlin	SD-C401-CDP25-2291 – Eleanor Minihan	SD-C401-CDP25-2292 – Gerard Whelan
SD-C401-CDP25-2293 – Gerard Whelan	SD-C401-CDP25-2294 – Gerry Beirne	SD-C401-CDP25-2295 – Gerry Murray
SD-C401-CDP25-2296 – Gillian Keating	SD-C401-CDP25-2297 – Gillian O Brien	SD-C401-CDP25-2298 – Gráinne Hannon

SD-C401-CDP25-2299 – Eileen Gorman	SD-C401-CDP25-2300 – Gráinne O Sullivan	SD-C401-CDP25-2301 – Eileen Lynch
SD-C401-CDP25-2302 – Eimear Carolan Jack Griffin	SD-C401-CDP25-2303 – Hannah Jordan	SD-C401-CDP25-2304 – Holly Mc Cormack
SD-C401-CDP25-2305 – Hannah Mc Stay	SD-C401-CDP25-2306 – Mary Mills	SD-C401-CDP25-2307 – Elena D'Alba
SD-C401-CDP25-2308 – Helen Stairs	SD-C401-CDP25-2309 – Elizabeth Griffin	SD-C401-CDP25-2310 – Helga Myler
SD-C401-CDP25-2311 – Henry Keogh	SD-C401-CDP25-2312 – Feidhlim Glynn	SD-C401-CDP25-2313 – Ella Dawson
SD-C401-CDP25-2314 – Ella Mulhern	SD-C401-CDP25-2315 – Fergal Hiughes	SD-C401-CDP25-2316 – Ellie Jordan
SD-C401-CDP25-2317 – Emer Crooke	SD-C401-CDP25-2318 – Emma Dillon	SD-C401-CDP25-2319 – Fionn Donoghue
SD-C401-CDP25-2320 – Emma Solan	SD-C401-CDP25-2321 – Eoin Carolan	SD-C401-CDP25-2322 – Erris Smith
SD-C401-CDP25-2323 – J Flynn	SD-C401-CDP25-2324 – Florrie Dowling	SD-C401-CDP25-2325 – Esther Beirne
SD-C401-CDP25-2326 – ethel larkin	SD-C401-CDP25-2327 – Frances Norton	SD-C401-CDP25-2328 – Inez Cooper
SD-C401-CDP25-2329 – Frank O' Reilly	SD-C401-CDP25-2330 – Eugene Heary	SD-C401-CDP25-2331 – Inga Moga

SD-C401-CDP25-2332 – Eugene O'Keeffe	SD-C401-CDP25-2333 – Evan Somers	SD-C401-CDP25-2334 – A N Other
SD-C401-CDP25-2335 – A Another	SD-C401-CDP25-2336 – John Bellew	SD-C401-CDP25-2337 – John Egan
SD-C401-CDP25-2338 – John O'Neill	SD-C401-CDP25-2339 – J Gorman	SD-C401-CDP25-2340 – Jean Kelly
SD-C401-CDP25-2341 – John Lamphion	SD-C401-CDP25-2342 – Tom Mc Cormack	SD-C401-CDP25-2343 – Jessica Ryan
SD-C401-CDP25-2344 – Julie Mc Fadden	SD-C401-CDP25-2345 – Jeananne Moriarty	SD-C401-CDP25-2346 – Julia Mulhern
SD-C401-CDP25-2347 – Joan O Donoghue	SD-C401-CDP25-2348 – John O Dwyer	SD-C401-CDP25-2349 – Jackie Kearney
SD-C401-CDP25-2350 – Jennifer Stevenson	SD-C401-CDP25-2351 – James Doyle	SD-C401-CDP25-2352 – James Ffrench
SD-C401-CDP25-2353 – John Vaughan	SD-C401-CDP25-2354 – James Garrett	SD-C401-CDP25-2355 – James Murphy
SD-C401-CDP25-2356 – James O Brien	SD-C401-CDP25-2357 – Jane Ryan	SD-C401-CDP25-2358 – xx Varghese
SD-C401-CDP25-2359 – Jennifer Fox	SD-C401-CDP25-2360 – Jennifer Tierney	SD-C401-CDP25-2361 – Jack Bulter
SD-C401-CDP25-2362 – Jerry Fleming	SD-C401-CDP25-2363 – Karen Brodie	SD-C401-CDP25-2364 – Jimmy Doyle
SD-C401-CDP25-2365 – Jack Murphy	SD-C401-CDP25-2366 – JJ Redmond	SD-C401-CDP25-2367 – Joe Lancaster

SD-C401-CDP25-2368 – Joe Murphy	SD-C401-CDP25-2369 – Kevin Coughlan	SD-C401-CDP25-2370 – John Redmond
SD-C401-CDP25-2371 – John Bresnan	SD-C401-CDP25-2372 – Joan McCartney	SD-C401-CDP25-2373 – Kayleigh Cheny
SD-C401-CDP25-2374 – John Doyle	SD-C401-CDP25-2375 – John Garrett	SD-C401-CDP25-2376 – Joanne O'Shea
SD-C401-CDP25-2377 – John Handibode	SD-C401-CDP25-2378 – John Harte	SD-C401-CDP25-2379 – Joe Bevan
SD-C401-CDP25-2380 – Joe Egan	SD-C401-CDP25-2381 – Kiefa Connor	SD-C401-CDP25-2382 – John Kearney
SD-C401-CDP25-2383 – John O Connor	SD-C401-CDP25-2384 – John O Sullivan	SD-C401-CDP25-2385 – Kay Brodrick
SD-C401-CDP25-2386 – John O Toole	SD-C401-CDP25-2387 – Kate Doyle	SD-C401-CDP25-2388 – Lil Kinsella
SD-C401-CDP25-2389 – Liam Britton	SD-C401-CDP25-2390 – Karen Murphy	SD-C401-CDP25-2391 – Lara Delaney
SD-C401-CDP25-2392 – John Waine	SD-C401-CDP25-2393 – Lisa Geary	SD-C401-CDP25-2394 – Lisa McGuire
SD-C401-CDP25-2395 – Kathriona Pirie	SD-C401-CDP25-2396 – Lucy O'Doherty	SD-C401-CDP25-2397 – Lynn O'Dwyer
SD-C401-CDP25-2398 – Karen Wslsh	SD-C401-CDP25-2399 – Jonathan Byrne	SD-C401-CDP25-2400 – Lorraine Travers
SD-C401-CDP25-2401 – John Bresnan	SD-C401-CDP25-2402 – Jonathan Somers	SD-C401-CDP25-2403 – Karen Handibone

SD-C401-CDP25-2404 – Joseph Vera	SD-C401-CDP25-2405 – Julie Heinz	SD-C401-CDP25-2406 – Laura Crooke
SD-C401-CDP25-2407 – Julie Keogh	SD-C401-CDP25-2408 – Karen Murray	SD-C401-CDP25-2409 – Laura Curtin
SD-C401-CDP25-2410 – Lena Murphy	SD-C401-CDP25-2411 – Laura Tracey	SD-C401-CDP25-2412 – Leonora Acton
SD-C401-CDP25-2413 – Kate O'Brien	SD-C401-CDP25-2414 – Liam Collins	SD-C401-CDP25-2415 – Liam Goggin
SD-C401-CDP25-2416 – Liam Hayes	SD-C401-CDP25-2417 – Kate O' Grady	SD-C401-CDP25-2418 – Linda Ffrench
SD-C401-CDP25-2419 – Lauren Dawson	SD-C401-CDP25-2420 – Lisa Heery	SD-C401-CDP25-2421 – Lena Waine
SD-C401-CDP25-2422 – Kathrine Heary	SD-C401-CDP25-2423 – Lisa Kavanagh	SD-C401-CDP25-2424 – Niamh Burns
SD-C401-CDP25-2425 – Kathleen Keane	SD-C401-CDP25-2426 – Lorna Carroll	SD-C401-CDP25-2427 – Lorraine Daly
SD-C401-CDP25-2428 – N. Maloney	SD-C401-CDP25-2429 – Louise Whelan	SD-C401-CDP25-2430 – Luke Gannon
SD-C401-CDP25-2431 – Nilda Maongco	SD-C401-CDP25-2432 – Katie Murnaghan	SD-C401-CDP25-2433 – M Mullarkey
SD-C401-CDP25-2434 – Kb Mun	SD-C401-CDP25-2435 – Nessa McCall	SD-C401-CDP25-2436 – Maurice Britton
SD-C401-CDP25-2437 – Keith Nolan	SD-C401-CDP25-2438 – Mary Browne	SD-C401-CDP25-2439 – Maeve Byrne
SD-C401-CDP25-2440 – Nicoletia Niorella	SD-C401-CDP25-2441 – Mary Cunningham	SD-C401-CDP25-2442 – Kellie O'Brien

SD-C401-CDP25-2443 – Neha Ryan	SD-C401-CDP25-2444 – Niamh Fahey	SD-C401-CDP25-2445 – Maeve Dowling
SD-C401-CDP25-2446 – Mary Downes	SD-C401-CDP25-2447 – Martin Dunne	SD-C401-CDP25-2448 – Maura Hennelly
SD-C401-CDP25-2449 – Michael Kennedy	SD-C401-CDP25-2450 – Niamh Heery	SD-C401-CDP25-2451 – Niamh O'Brien
SD-C401-CDP25-2452 – Nicola D'Alba	SD-C401-CDP25-2453 – Nicola Smith	SD-C401-CDP25-2454 – Nigel Wright
SD-C401-CDP25-2455 – Nikki Sheerin	SD-C401-CDP25-2456 – Nina Butler	SD-C401-CDP25-2457 – Noel Crotty
SD-C401-CDP25-2458 – Noel Gilmore	SD-C401-CDP25-2459 – Noel Keane	SD-C401-CDP25-2460 – Noel Mollloy
SD-C401-CDP25-2461 – Noeleen Crotty	SD-C401-CDP25-2462 – Nora Butlter	SD-C401-CDP25-2463 – Noreen Keegan
SD-C401-CDP25-2464 – Maebh Loughnane	SD-C401-CDP25-2465 – Margaret Nolan	SD-C401-CDP25-2466 – Maria Martin Ochz
SD-C401-CDP25-2467 – Mairead Mc Breen	SD-C401-CDP25-2468 – Maureen Mc Glynn	SD-C401-CDP25-2469 – Majella Mc Keon
SD-C401-CDP25-2470 – Mick Morris	SD-C401-CDP25-2471 – Ken Saunders	SD-C401-CDP25-2472 – Marion Nestor
SD-C401-CDP25-2473 – Mirat Oari	SD-C401-CDP25-2474 – Kevin Dawson	SD-C401-CDP25-2475 – Mona O Brien
SD-C401-CDP25-2476 – Maria Stewart	SD-C401-CDP25-2477 – Kim Sharkey	SD-C401-CDP25-2478 – Michelle Walsh

SD-C401-CDP25-2479 – Mairead Madigan	SD-C401-CDP25-2480 – Kitty Flood	SD-C401-CDP25-2481 – Kyle Duff
SD-C401-CDP25-2482 – Margaret Gilmartin	SD-C401-CDP25-2483 – Margaret Tuffy	SD-C401-CDP25-2484 – Margurita McGeady
SD-C401-CDP25-2485 – Marian Reilly	SD-C401-CDP25-2486 – Marianne O'Connell	SD-C401-CDP25-2487 – Marie Anderson
SD-C401-CDP25-2488 – Marie Dardis	SD-C401-CDP25-2489 – Marie K	SD-C401-CDP25-2490 – Marie Kennedy
SD-C401-CDP25-2491 – O. Cahill	SD-C401-CDP25-2492 – Olivia Goldrick	SD-C401-CDP25-2493 – Olga & John Long
SD-C401-CDP25-2494 – Oliver Malone	SD-C401-CDP25-2495 – Olivia Thomas	SD-C401-CDP25-2496 – Ursula Eaton
SD-C401-CDP25-2497 – Una McDonald	SD-C401-CDP25-2498 – Ultan McDonagh	SD-C401-CDP25-2499 – Una Ní Mhuirí
SD-C401-CDP25-2500 – Venera Aranasova	SD-C401-CDP25-2501 – Veronica Hauyousc	SD-C401-CDP25-2502 – Val Poleon
SD-C401-CDP25-2503 – Valerie Maher	SD-C401-CDP25-2504 – Wah Wan Wan	SD-C401-CDP25-2505 – Wilfred Stevenson
SD-C401-CDP25-2506 – William Gleeson	SD-C401-CDP25-2507 – William Ryan	SD-C401-CDP25-2508 – William Poole
SD-C401-CDP25-2509 – Yvonne Finglas	SD-C401-CDP25-2510 – Yvonne O'Shea Michael Gatley	SD-C401-CDP25-2511 – Marie McCormack

SD-C401-CDP25-2512 – Mark Doyle	SD-C401-CDP25-2513 – Martin and Tonya O'Connell	SD-C401-CDP25-2514 – Martin Baxter
SD-C401-CDP25-2515 – Martin Mockler	SD-C401-CDP25-2516 – Martin O' Donoghue	SD-C401-CDP25-2517 – Martin Walsh
SD-C401-CDP25-2518 – Martina Butler	SD-C401-CDP25-2519 – Mary Dawson	SD-C401-CDP25-2520 – Mary Feeney
SD-C401-CDP25-2521 – Mary Heeny	SD-C401-CDP25-2522 – Mary Lacey	SD-C401-CDP25-2523 – Mary McGrath
SD-C401-CDP25-2524 – Mary Rafter	SD-C401-CDP25-2525 – Mary Reid	SD-C401-CDP25-2526 – Mary Scally
SD-C401-CDP25-2527 – Mary Smith	SD-C401-CDP25-2528 – Matthew Gannon	SD-C401-CDP25-2529 – Matthew Ward
SD-C401-CDP25-2530 – Maura O' Reilly	SD-C401-CDP25-2531 – Maureen Goggin	SD-C401-CDP25-2532 – Maureen and Seamus Kelly
SD-C401-CDP25-2533 – Maireád Madigan	SD-C401-CDP25-2534 – Marcus Carey	SD-C401-CDP25-2535 – Margaret Barnes
SD-C401-CDP25-2536 – Robert Collins	SD-C401-CDP25-2537 – Rory Downes	SD-C401-CDP25-2538 – Ronald Doyle
SD-C401-CDP25-2539 – Ruth Malone	SD-C401-CDP25-2540 – Rita Mc Cabe	SD-C401-CDP25-2541 – Raymond Campion
SD-C401-CDP25-2542 – Raymond Doyle	SD-C401-CDP25-2543 – Rebecca Coughlan	SD-C401-CDP25-2544 – Rena O Donnell
SD-C401-CDP25-2545 – Richard Heffernan	SD-C401-CDP25-2546 – Richie Feeney	SD-C401-CDP25-2547 – Rita O Brien

SD-C401-CDP25-2548 – Robert O Connell	SD-C401-CDP25-2549 – Robin Adamson	SD-C401-CDP25-2550 – Ronan Flynn
SD-C401-CDP25-2551 – Rosaleen Kelly	SD-C401-CDP25-2552 – Rosaleen Doyle	SD-C401-CDP25-2553 – Rosemary Farrelly Louis Mantoufeh
SD-C401-CDP25-2554 – Roy Cooper	SD-C401-CDP25-2555 – Ryan Mc Coy	SD-C401-CDP25-2556 – Patrick Brodie
SD-C401-CDP25-2557 – Patrick Byrne	SD-C401-CDP25-2558 – S. Brady	SD-C401-CDP25-2559 – Maureen O' Flynn
SD-C401-CDP25-2560 – Saija Collins	SD-C401-CDP25-2561 – Sarah Cullen	SD-C401-CDP25-2562 – Maurice Walsh
SD-C401-CDP25-2563 – May Bresnan	SD-C401-CDP25-2564 – Stuart Doyle	SD-C401-CDP25-2565 – May Mahon
SD-C401-CDP25-2566 – Siobhan Dunne	SD-C401-CDP25-2567 – Sarah Fahy	SD-C401-CDP25-2568 – Megan Ryan
SD-C401-CDP25-2569 – Siobhan Gray	SD-C401-CDP25-2570 – Melita Gorman	SD-C401-CDP25-2571 – Shay Hurson
SD-C401-CDP25-2572 – Michael Feeney	SD-C401-CDP25-2573 – Stephen McCabe	SD-C401-CDP25-2574 – Michael Heffernan
SD-C401-CDP25-2576 – Sean McClean	SD-C401-CDP25-2577 – Michael Marshall	SD-C401-CDP25-2578 – Sarah Mulconry
SD-C401-CDP25-2579 – Michael McShane	SD-C401-CDP25-2580 – Pamela Duggan	SD-C401-CDP25-2581 – Patrick Bradley

SD-C401-CDP25-2582 – Reece Lamphiere	SD-C401-CDP25-2583 – Roman Picoub	SD-C401-CDP25-2584 – Michael O'Brien
SD-C401-CDP25-2585 – Michaela Casey	SD-C401-CDP25-2586 – Michael Peasrse O'Connell	SD-C401-CDP25-2587 – Patrick Dunne
SD-C401-CDP25-2588 – Patrick Geraghty	SD-C401-CDP25-2589 – Peter Geraghty	SD-C401-CDP25-2590 – Michelle Coffey
SD-C401-CDP25-2591 – Paul Godsen	SD-C401-CDP25-2592 – Michelle Duffy	SD-C401-CDP25-2593 – Peter Gray
SD-C401-CDP25-2594 – Piotr Janowicz	SD-C401-CDP25-2595 – Sandra Muldowney	SD-C401-CDP25-2596 – Paul Cope
SD-C401-CDP25-2597 – Michelle MC Dermott	SD-C401-CDP25-2598 – Peggy Miller	SD-C401-CDP25-2599 – Phil Rountree
SD-C401-CDP25-2600 – P Sareene	SD-C401-CDP25-2601 – PT Moloney	SD-C401-CDP25-2602 – Selina O'Doherty
SD-C401-CDP25-2603 – Michelle McMahon	SD-C401-CDP25-2604 – Patrick Tarpey	SD-C401-CDP25-2605 – Patricia Treacy
SD-C401-CDP25-2606 – Siobhán O'Sullivan	SD-C401-CDP25-2607 – Paul Walsh	SD-C401-CDP25-2608 – Miguel Luca
SD-C401-CDP25-2609 – Pam Stacey	SD-C401-CDP25-2610 – Siobhán Rea	SD-C401-CDP25-2611 – Patilia Lidia
SD-C401-CDP25-2612 – Patricia Garrett	SD-C401-CDP25-2613 – Patricia O Brien	SD-C401-CDP25-2614 – Mike Heffernan

SD-C401-CDP25-2615 – Mr/Ms Santhosh	SD-C401-CDP25-2616 – Patricia O Ríordaín	SD-C401-CDP25-2617 – Seán Breen
SD-C401-CDP25-2618 – Patrick Phillips Bridget Phillips	SD-C401-CDP25-2619 – Molly Curtin	SD-C401-CDP25-2620 – Patrick Gorman
SD-C401-CDP25-2621 – Sandra Walsh	SD-C401-CDP25-2622 – Patrick Griffin	SD-C401-CDP25-2623 – Monica Carney
SD-C401-CDP25-2624 – Patrick Keegan	SD-C401-CDP25-2625 – Patrick Moran	SD-C401-CDP25-2626 – Paul Henderson
SD-C401-CDP25-2627 – Paul Murphy	SD-C401-CDP25-2628 – Sadhbh O'Connell	SD-C401-CDP25-2629 – Paul Smith
SD-C401-CDP25-2630 – Paul Waine	SD-C401-CDP25-2631 – Paula Mellon	SD-C401-CDP25-2632 – Peter Kelly Patricia Kelly
SD-C401-CDP25-2633 – Myra Moran	SD-C401-CDP25-2634 – Sharon Holland	SD-C401-CDP25-2635 – Peter O Toole
SD-C401-CDP25-2636 – Peter Larragy	SD-C401-CDP25-2637 – Shauna Smith	SD-C401-CDP25-2638 – Philomena Mc Shane
SD-C401-CDP25-2639 – Sheena Duffy	SD-C401-CDP25-2640 – Eamonn Smith	SD-C401-CDP25-2641 – Samuel Keogh
SD-C401-CDP25-2642 – Sarah Cooper	SD-C401-CDP25-2643 – Sarah Matthews	SD-C401-CDP25-2644 – Sheila Collins

SD-C401-CDP25-2645 – Sean Feeney	SD-C401-CDP25-2646 – Jai Ting Yang	SD-C401-CDP25-2647 – Sheila O' Toole
SD-C401-CDP25-2648 – Sinead Baxter	SD-C401-CDP25-2649 – Sally Martin	SD-C401-CDP25-2650 – Sarah Doyle
SD-C401-CDP25-2651 – Tatiana Izbas	SD-C401-CDP25-2652 – Sarah Doyle	SD-C401-CDP25-2653 – Tony McDonald
SD-C401-CDP25-2654 – Sarah Lynch	SD-C401-CDP25-2655 – Sarah Murphy	SD-C401-CDP25-2656 – Sarah Smith
SD-C401-CDP25-2657 – Sarah Smith	SD-C401-CDP25-2658 – Sinead Clarke	SD-C401-CDP25-2659 – Therese M. Pirie
SD-C401-CDP25-2660 – Sarah Tracey	SD-C401-CDP25-2661 – Shane Walker	SD-C401-CDP25-2662 – Siobhan O' Donnell
SD-C401-CDP25-2663 – Shane Whelan	SD-C401-CDP25-2664 – Teresa Seravo	SD-C401-CDP25-2665 – Trevor Treacy
SD-C401-CDP25-2666 – Siobhan Smith	SD-C401-CDP25-2667 – Tim Corbett	SD-C401-CDP25-2668 – Tim Griffin
SD-C401-CDP25-2669 – Tom Mullarkey	SD-C401-CDP25-2670 – Thomas & Patricia Keogh	SD-C401-CDP25-2671 – Sive Keogh
SD-C401-CDP25-2672 – Tony Ivers	SD-C401-CDP25-2673 – Triona Walsh	SD-C401-CDP25-2674 – Thomas Kavanagh
SD-C401-CDP25-2675 – Stephnie Jenkins Blairsdale	SD-C401-CDP25-2676 – K Durkin	SD-C401-CDP25-2677 – Stephen Costello
SD-C401-CDP25-2678 – Stuart Donnelly	SD-C401-CDP25-2679 – Stuart Doyle	SD-C401-CDP25-2680 – Byrne Ann

Summary	CE Response
The issues raised in submissions in relation to the proposed RES-N zoning at St. Edmundsbury have been carefully considered, particularly in the context of the site's location within the Liffey Valley, its relationship with Lucan Village, and the cumulative development pressures arising from Adamstown SDZ, Clonburris SDZ and surrounding lands. A submission was received from the landowners of St. Edmundsbury, O'Flynn Group, via McCutheoin Halley Planning Consultants. The submission supported the rezoning of the lands for RES-N, stating that 'the proposed variation represents a balanced and plan-led approach which supports the delivery of much-needed housing in a sustainable urban location while simultaneously contributing to the protection, enhancement and long-term accessibility of the Liffey Valley as a major environmental and recreational asset. The proposed rezoning of the St Edmundsbury lands can therefore be considered consistent with the principles of proper planning and sustainable development, supporting compact growth within the existing settlement of Lucan while safeguarding and enhancing the landscape, ecological and recreational value of the Liffey Valley', and in summary it states: • The proposed rezoning at St. Edmundsbury is considered to align with the statutory objective of proper planning and sustainable development.	This amendment is in relation to the designation of lands at the St. Edmundsbury, that are currently zoned Objective HA to a RES-N and OS under Variation No. 2 of the South Dublin County Development Plan 2022-2028. The rezoning includes an associated SLO, CS7 SLO2, it states the following: *Development on RES-N zoned lands at St. Edmundsbury, Lucan Road shall comply with the following:* *1. The development of a park within the Liffey Valley (zoning objective HA-LV) with enhanced recreational amenity and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network* *shall be provided for in tandem with, or prior to, residential development of the adjoining Res-N zoned lands. The park shall include lands within the HA-LV zoning objective to the north and west of the Res-N zoned lands extending to the River Liffey, including to the north and west of St. Patrick's Hospital grounds, and including connections westwards to Lucan Village and Chapel Hill. A detailed proposal to achieve this shall be agreed with the planning authority in advance of submission of a planning application for residential development on the Res-N zoned lands.* *2. A masterplan for the lands shall be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by* *and addressing, inter alia:* *a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species,*

• The site is identified as a strategic location at the interface between the urban area of Lucan and the Liffey Valley, with potential to support compact residential growth while enhancing the Liffey Valley as a regional parkland resource. • The inclusion of CS7 SLO 2 is welcomed, as it provides a robust, plan-led framework linking residential development to the delivery of parkland, enhanced recreational access and strengthened green infrastructure. • The requirement for a comprehensive masterplan, informed by ecological, landscape, heritage and transport assessments, ensures development will be coordinated and environmentally sensitive. • Public concerns regarding landscape protection, ecological sensitivity and infrastructure are acknowledged, but it is argued that the variation strengthens rather than weakens protections for the Liffey Valley. • The proposal to deliver a Liffey Valley Park on adjoining HA-LV lands, in tandem with development, is highlighted as a key benefit, improving public access, biodiversity and recreational amenity. • The development of approximately 540 homes is considered a modest and sustainable level of growth, supported by proximity to services, facilities and public transport,	*b. Retention and enhancement of the east-west hedgerow and tree line in the north of the site as recorded on 1st Edition OS maps,* *c. A Local landscape and historical character assessment,* *d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and* *e. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structures and their curtilage* The subject lands are located directly north/north east of Lucan village, adjoining its northern boundary is the Liffey Valley SAA. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines. required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units.

consistent with compact and transport-oriented development principles. Overall, the submission concludes that the variation represents a balanced, policy-compliant approach, supporting housing delivery while enhancing the environmental, recreational and landscape value of the Liffey Valley. **Overdevelopment – Lucan Wide Cumulative Impact** Overdevelopment and disproportionate levels of development have been flagged as issues throughout the consultation submission received by SDCC. Key issues raised include: Disproportionate levels of zonings in certain areas (e.g. Lucan) Certain sites may be omitted from the proposed variation (e.g. Finnstown, Foxhunter, St. Edmunsbury etc.) Further to this, incorrect baseline figures and analysis have been suggested in submissions and used to undertake capacity audit. Additionally, it is also stated that adequate zoned land already exists within the county to meet current demand, contrary to capacity audit. The proposed variation is also suggested to undermine the SDCC own development plan. The topic of 'Overdevelopment' is dealt with in each of the various variation sites throughout this report, however, in a broader sense, the wider context is dealt with in some detail below to allow for wider	Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity.

consideration, notably in the comparative context of Lucan and Waterford, as well as how sites were selected. Submissions also raise consistent and strongly expressed concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by rapid population growth, disproportionate housing delivery, and inadequate supporting infrastructure. Residents emphasise that Lucan has undergone significant expansion over several decades, with population growth increasing from a small village of a few thousand in the 1980s, to approximately 15,000 by 1990, 57,000 by 2016, and circa 65,000 by 2026, largely driven by continuous residential development. This growth is frequently compared to that of a city, with Lucan now described as having a population broadly comparable to Waterford City, but without appropriate infrastructure, services or facilities. Concerns are further raised regarding density, noting that Lucan accommodates a similar population within a significantly smaller land area, resulting in a markedly more intense urban form. A key theme is the perception that Lucan and Adamstown have absorbed a disproportionate share of housing development within South Dublin, including the delivery of two Strategic Development Zones (Adamstown and Clonburris), with	South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. **Overdevelopment – Lucan Wide Cumulative Impact** Submissions raise consistent and strongly held concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by cumulative population growth, a concentration of housing delivery, and infrastructure provision not keeping pace with development. The Planning Authority acknowledges that the Lucan–Adamstown area has experienced significant and sustained population growth over several decades, evolving from a small settlement into a major suburban population centre within the Dublin Metropolitan Area. The area forms part of a key growth corridor within the Dublin Metropolitan Area, where the availability of suitable and serviceable lands, including those proximate to existing and planned transport infrastructure, has been identified at regional and national level as critical to meeting housing demand. A central concern relates to the cumulative impact of development, with submissions asserting that population growth has outpaced the provision of critical infrastructure. Concerns relating to congestion on key transport routes, public transport capacity, and pressure on schools, childcare, healthcare and community facilities are recognised as part of the cumulative impact of growth in the area. Specific issues include traffic congestion on key routes such as the N4, Adamstown Road, Newcastle Road and within Lucan Village, alongside

submissions highlighting that this is unique nationally. It is also noted that 64% of lands identified for additional development under Proposed Variation No. 2 are located within the Lucan–Adamstown area, reinforcing concerns regarding imbalanced spatial distribution of growth. The cumulative pipeline of development is considered substantial, with thousands of units already delivered and significant additional capacity (including SDZ build-out lands and proposed rezonings) yet to be realised, potentially resulting in a further major increase in population. Submissions consistently assert that this level of growth has outpaced the delivery of critical infrastructure and services, resulting in existing deficits across multiple sectors. Transport infrastructure is identified as a primary constraint, with references to chronic congestion on the N4, Newcastle Road, Adamstown Road, R120 and within Lucan Village, where traffic is described as persistent throughout the day rather than limited to peak periods. Public transport is considered insufficient and unreliable, with overcrowded bus services, lack of rail or Luas connectivity, and the absence of a direct link to Dublin Airport highlighted as key failings. The projected growth associated with further rezonings is considered likely to exacerbate car dependency, congestion and associated environmental impacts.	constraints in public transport capacity, including overcrowded bus services and reliance on future rail interventions. Submissions also highlight pressure on social infrastructure, including school places, childcare provision, healthcare services and community facilities, with references to oversubscription and capacity constraints. In addition, concerns are raised regarding the loss of greenfield lands and high-amenity areas, which are viewed as important for environmental quality, recreation and biodiversity. Submissions also raise concerns that a disproportionate quantum of lands identified under the proposed variation are located within the Lucan–Adamstown area. The Planning Authority acknowledges the perception that a disproportionate share of future development is directed to the Lucan area; however, the identification of lands is not based on geographic distribution, but on a rigorous, evidence-based assessment of suitability, infrastructure capacity, accessibility and alignment with national planning policy. In this regard, the availability of suitably located lands within the Dublin Metropolitan Area, including in Lucan–Adamstown, is a key factor in accommodating projected population growth. Submissions frequently draw comparisons with Waterford City to illustrate the scale of population growth; however, the Planning Authority considers that such comparisons require careful contextualisation. Waterford is designated under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) as a Regional City of Scale, with a defined Metropolitan Area Strategic Plan (MASP) and a clear national policy objective to achieve significant population growth supported by targeted investment in infrastructure, regeneration and metropolitan-scale services.

Similarly, significant pressure is identified on social infrastructure, including school capacity, childcare provision and healthcare services. Submissions refer to school place shortages, oversubscribed facilities, and limited GP availability, with many practices reportedly not accepting new patients. Community, recreational and sports facilities are also considered deficient relative to the size of the population, with recent examples cited of facilities reaching capacity shortly after opening. This is compounded by concerns regarding utilities and drainage infrastructure, with suggestions that some systems are already approaching or exceeding operational capacity. A further critical issue is the loss of remaining greenfield and high-amenity lands, particularly at locations such as St. Edmundsbury, Finnstown and other proposed sites. These lands are described as important for biodiversity, landscape character, recreation, and climate resilience, as well as forming part of the wider Liffey Valley green infrastructure network. Their rezoning is viewed as contributing to the progressive erosion of natural and environmental assets in an area already experiencing extensive urbanisation. Overall, the issue of overdevelopment is framed in terms of cumulative impact, with submissions arguing that continued rezoning, in advance of infrastructure delivery, represents a	By comparison, the Lucan–Adamstown–Palmerstown area forms part of the wider Dublin Metropolitan Area, where growth is planned and distributed across the region in accordance with national housing targets and strategic planning policy, and where the availability of land and proximity to transport corridors are key determinants in shaping development patterns. The revised NPF provides for substantial population growth within the Eastern and Midland Region, reflecting Dublin's role as the primary engine of national population growth, while also supporting higher relative growth in regional cities to achieve balanced regional development. In this context, the Planning Authority considers that the proposed variation responds to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land be identified to meet increased and accelerated housing demand. Submissions question the necessity of proposed rezonings, with reference to the housing capacity identified in the South Dublin County Development Plan 2022–2028. While it is acknowledged that the Development Plan identified a substantial quantum of zoned land, subsequent to its adoption there have been significant changes in national planning policy, including the revised NPF and associated Section 28 Ministerial Guidelines. These guidelines require planning authorities to review their Core Strategy and zoning provisions to ensure alignment with updated housing targets and delivery requirements. In response, the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. This process included engagement with key internal departments and relevant infrastructure providers to

“housing-led” rather than “infrastructure-led” approach. The prevailing concern is that further development will intensify existing deficits, leading to declines in quality of life, increased congestion and environmental pressure, and an erosion of local character and community cohesion, unless balanced by timely and proportionate investment in infrastructure and services. **Overdevelopment** Overdevelopment is a prominent and consistently raised issue across submissions, framed primarily in terms of the cumulative impact of sustained growth in the Lucan–Adamstown area over an extended period. Submissions argue that Lucan, and more broadly South Dublin County, has accommodated a disproportionate share of residential development, particularly through major planned areas such as Adamstown SDZ and Clonburris SDZ, together with other rezoning initiatives. In this context, it is contended that infrastructure, services and environmental capacity have not kept pace with the scale and speed of development, leading to measurable impacts on quality of life. Submissions cite pressures on transport networks, schools, healthcare services and utilities, alongside increased congestion and reliance on private car use. Particular emphasis is placed on the impact of traffic	ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development. The sites identified under the proposed variation were selected on the basis of this evidence-based assessment, having regard to their proximity to existing and planned infrastructure, their capacity to support appropriate densities, and their alignment with compact growth and transport-oriented development principles. Importantly, future development is not unstructured but will be coordinated through the application of site-specific Specific Local Objectives (SLOs) and the Development Plan framework. Zoning represents a strategic first step and does not, in itself, facilitate immediate development. The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. In this way, SLOs provide a structured mechanism to ensure that development is aligned with available or planned infrastructure and proceeds in a coordinated manner. Furthermore, the SLOs ensure that development proposals are subject to detailed assessment and coordination, thereby avoiding piecemeal or uncoordinated development and ensuring that infrastructure requirements, including transport demand, are clearly identified and addressed at the appropriate stage. The Council has also delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan

on Lucan Village, with concerns that ongoing development is eroding its function, character and accessibility as a historic settlement. Submissions further highlight the perceived progressive loss of green space and amenity land, with rezoning proposals at St. Edmundsbury, Finnstown, Aderrig and Foxhunter viewed collectively as contributing to an unsustainable concentration of development. This is described as placing additional strain on an already constrained environment, while diminishing the distinct identity and landscape setting of the area. Overall, overdevelopment is presented as a cumulative and strategic concern, centred on the belief that Lucan has already absorbed a significant level of growth and that further rezonings risk exceeding the capacity of existing infrastructure, undermining the character of the historic village, and contributing to increased congestion and environmental degradation. **Policy and Phasing** Issues relating to policy alignment and phasing are raised consistently across submissions and are closely interlinked. Submissions express strong concern that the proposed rezoning of St. Edmundsbury is premature, particularly in the context of the ongoing and incomplete delivery of Adamstown SDZ and Clonburris SDZ, both of which	House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. These investments demonstrate the Council's ongoing commitment to aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone (SDZ) framework represents best practice in the coordinated delivery of large-scale residential communities. These areas have been planned and phased to provide for the delivery of community facilities, transport infrastructure and open space in tandem with population growth. This approach reflects a coordinated, urban design-led model of development, promoting the efficient use of land and supporting transport-oriented development. The experience of the SDZs has informed the Council's approach to future growth, and the Planning Authority will continue to apply and reflect on the lessons learned to ensure that development is delivered in a coordinated and sustainable manner. The delivery of infrastructure such as DART+ South West, BusConnects and active travel networks provides the basis for improved sustainable mobility within the wider area. It is recognised that public transport service provision and service levels are a matter for the National Transport Authority (NTA) and relevant operators. The Planning Authority will continue to engage with the NTA and other stakeholders to ensure that future transport demand arising from

continue to experience infrastructure, transport and service deficits. It is argued that residential development has progressed historically ahead of supporting infrastructure, and that further rezonings would perpetuate this pattern. Submissions therefore advocate an “infrastructure-first” approach, whereby additional lands should not be brought forward until existing zoned lands are substantially developed and supported by fully operational transport, community and utility infrastructure. From a policy perspective, multiple submissions contend that the proposed rezoning is inconsistent with key national and regional frameworks, including the National Planning Framework (Revised 2025), the Regional Spatial and Economic Strategy (RSES), Project Ireland 2040, and the Core Strategy of the Development Plan. In particular, concerns are raised regarding perceived conflict with the principles of compact growth, sequential development and infrastructure-led planning, as well as with environmental protection objectives. Submissions argue that insufficient justification has been provided to demonstrate why existing zoned lands cannot meet housing requirements within the current plan period, and suggest that progressing additional greenfield zoning may undermine the plan-led approach. Overall, submissions frame policy and phasing as a combined issue centred on the need for clear sequencing of development, demonstrable	population growth, including that facilitated by these rezonings, is planned for and responded to in a coordinated manner, aligned with national and regional transport strategies. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated district and neighbourhood transport assessments. This will inform detailed engagement with both elected members and national transport agencies on future transport options and potential projects. This study will develop a transport strategy. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. While the cumulative nature of development in the Lucan–Adamstown area is acknowledged, it is managed through ongoing coordination of land use, infrastructure planning and delivery. In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools, health care, and transport services by relevant agencies.

infrastructure capacity and alignment with national policy objectives, with a consistent call for consolidation of existing growth areas prior to the advancement of new lands. **Density and Housing** Issues relating to density and housing are raised consistently across submissions and are framed predominantly in cumulative terms, rather than in relation to the specific characteristics of St. Edmundsbury in isolation. Submissions emphasise that Lucan has already accommodated a significant proportion of recent housing delivery within the County, largely through the ongoing development of Adamstown SDZ and Clonburris SDZ, both of which remain incomplete and continue to be supported by infrastructure that is still being delivered. Density concerns are therefore strongly linked to the overall scale and intensity of development in the Lucan–Adamstown area, with submitters arguing that the cumulative density already permitted or constructed is excessive relative to the capacity of transport networks, services and environmental infrastructure. In this regard, submissions describe Lucan as having absorbed a disproportionate share of growth, with one submission noting that the Lucan/Clondalkin LEA accounted for a significant proportion of national housing output in recent years, and characterising further zoning as an unjustified	As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. The Planning Authority will continue to engage with relevant agencies to align future development with the timely delivery of supporting infrastructure. Overall, the concerns raised regarding overdevelopment, infrastructure capacity and quality of life are acknowledged. However, the Planning Authority is satisfied that the proposed variation is grounded in national policy, statutory requirements and a coordinated development framework. The approach seeks to balance the need to accommodate ongoing population growth within the Dublin Metropolitan Area—supported by the availability of suitable lands—with the delivery of infrastructure, sustainable transport integration and the principles of compact, transit-oriented development, while contributing to broader national objectives of balanced regional growth. **Overdevelopment** The concerns raised in submissions regarding overdevelopment are acknowledged, particularly the perception that the Lucan–Adamstown area has absorbed a disproportionate share of residential growth and

intensification of an already high-density and infrastructure-constrained corridor. In terms of housing, submissions consistently state that there is no objection to housing delivery in principle, but rather to the location and timing of additional housing at St. Edmundsbury. Concerns are expressed that substantial areas of land remain zoned and under construction within Adamstown and Clonburris, and that these lands should be prioritised and consolidated before additional greenfield sites are brought forward. It is argued that advancing new residential zoning in advance of completing existing SDZs risks perpetuating a pattern whereby housing development proceeds ahead of supporting infrastructure and services. Submissions also reference perceived inconsistencies with compact growth objectives, suggesting that the availability of existing zoned lands within established growth areas reduces the need to rezone additional lands at this stage. Housing delivery is therefore framed as a strategic and cumulative planning issue, with emphasis placed on sequencing, consolidation and infrastructure capacity, rather than on the suitability of St. Edmundsbury as a standalone development location. Overall, the issue of density and housing is presented in submissions as part of a broader concern regarding the scale, pace and concentration	that infrastructure, services and environmental capacity have not always kept pace. Submissions also highlight potential impacts on Lucan Village, including increased traffic congestion, pressure on community infrastructure, and the perceived erosion of the character and setting of this historic settlement. However, it is considered that the proposed zoning at St. Edmundsbury must be assessed within the context of a plan-led, policy-driven framework, grounded in national, regional and local planning policy rather than as unstructured or ad hoc growth. The identification of the site arises from a comprehensive capacity audit, which assessed lands across the County based on accessibility, availability of physical and social infrastructure, environmental constraints and alignment with strategic planning objectives. This approach ensures that the lands brought forward under the Variation are capable of supporting sustainable and coordinated development, consistent with national requirements. The approach is directly aligned with the National Planning Framework (NPF), which places strong emphasis on compact growth and Transport Orientated Development (TOD). In particular, National Policy Objectives 10, 97 and 99 support the delivery of residential development at appropriate locations within or adjacent to the existing urban footprint, focused on areas served by existing or planned high-capacity public transport. These policies recognise that both brownfield and greenfield lands within metropolitan areas may be required to meet housing demand, provided they are developed in a manner that is planned, integrated and supported by infrastructure investment. Furthermore, National Policy Objective 105 emphasises the importance of ensuring that priority zoned lands are supported by

of growth in the wider Lucan–Adamstown area, with calls for a more measured approach that prioritises the completion of existing development areas and alignment with infrastructure delivery before further lands are advanced. **Transport** <u>Active Travel</u> Submissions consistently raise concerns regarding the quality and safety of walking and cycling infrastructure in the St. Edmundsbury and wider Lucan area. Existing conditions are described as constrained, with narrow carriageways, discontinuous footpaths and a lack of segregated cycling routes, particularly along Lucan Road, Chapel Hill and connections to Lucan Village and the N4. St. Edmundsbury is specifically identified as an important informal active-travel and recreation area, providing off-road walking routes and access to the wider Liffey Valley SAAO and green network. Submissions highlight its daily use by residents, including families and older persons, and express concern that rezoning would remove this amenity while adding traffic to already constrained environments. The cumulative impact of development at Adamstown SDZ and Clonburris SDZ is cited as already limiting the feasibility of active travel, with further development viewed as likely to discourage walking and cycling rather than support modal shift, with associated impacts on physical and mental health.	the timely delivery of enabling infrastructure and that growth is carefully monitored to achieve compact development objectives. Importantly, the Specific Local Objective (SLO) provides a robust mechanism to address the concerns raised in relation to overdevelopment. The SLO requires that development is: • masterplan-led, ensuring a coordinated approach to the integration of the lands within the wider Lucan area; • supported by a detailed Transport and Traffic Assessment, which must assess cumulative impacts and identify appropriate mitigation measures; and • delivered alongside the provision of a substantial Liffey Valley park, which protects and enhances the landscape setting, maintains a strong green infrastructure framework, and provides significant amenity value. The requirement for a comprehensive masterplan, to be agreed with the Planning Authority prior to any development, ensures that the site is not developed in isolation but is instead integrated with surrounding lands, infrastructure capacity and environmental considerations. This masterplanning approach will address layout, environmental constraints and the relationship with Lucan Village, ensuring that development proceeds in a structured, integrated and sustainable manner. The provision of a park as a core component of the SLO is particularly significant in addressing concerns regarding the cumulative loss of green space. It ensures that a substantial portion of the lands is retained and enhanced as open space, thereby safeguarding landscape character, ecological connectivity, public access and amenity while reinforcing the identity of the Liffey Valley. This approach ensures that development is not solely residential in nature, but is balanced by

Parking Parking issues are raised in the context of existing pressures within Lucan Village and surrounding residential areas, particularly near schools and local centres. Submissions indicate that on-street parking is already a source of congestion and safety concern, with limited capacity to accommodate additional demand. It is argued that further residential development would intensify parking conflicts, reduce visibility and road safety, and further undermine pedestrian amenity. Traffic and Roads Traffic congestion is identified as the dominant transport issue across submissions. Existing conditions are described as severely constrained, with specific reference to high traffic volumes and congestion along: • Lucan Road, • the N4 corridor, • Newcastle Road, • Griffeen Road, • the Outer Ring Road, and • Lucan Village bridge crossings. Submissions refer to daily gridlock conditions, particularly at peak hours and school times, with estimated traffic volumes on Lucan Road in the range of 18,000–18,500 vehicles per day. The cumulative impact of development across Adamstown and	high-quality green infrastructure and environmental protection measures. Furthermore, all development proposals will be subject to the full provisions of the South Dublin County Development Plan 2022–2028 and relevant Section 28 Guidelines. This ensures that: • appropriate densities, building heights and urban design standards are applied in accordance with national and local policy; • proposals must demonstrate that they do not result in detrimental impacts on infrastructure capacity, environmental quality or residential amenity; and • cumulative impacts are fully assessed at planning application stage, with development only permitted where it can be accommodated sustainably. It is also emphasised that zoning does not predetermine the scale, density or form of development, and that all proposals will be subject to rigorous assessment, including detailed evaluation of infrastructure capacity, environmental constraints and the character of the receiving environment. Development which fails to meet these requirements or would give rise to unacceptable impacts will not be supported. In summary, while the concerns regarding overdevelopment are recognised, it is considered that: • the inclusion of St. Edmundsbury arises from a strategic, evidence-based process aligned with national housing and planning policy; • the NPF supports compact growth and TOD at accessible locations, including appropriate greenfield lands within metropolitan areas;

Clonburris is cited as a primary contributor to current congestion levels. Additional development at St. Edmundsbury is therefore viewed as likely to significantly worsen traffic conditions and road safety, particularly in an already constrained urban environment. <u>Public Transport</u> Public transport provision is consistently described as inadequate, overcrowded and unreliable. Submissions highlight: • bus services operating at or beyond capacity, with reports of buses passing stops during peak periods; • the absence of rail or Luas infrastructure directly serving Lucan; and • delays and uncertainty associated with planned projects such as DART+ South West and Luas Lucan proposals. Further to the above, the NTA notes the proposals to rezone a large number of sites throughout the County. It is the view of the NTA that those sites to the north at Lucan and Liffey Valley, additional to Finnstown Castle, Adamstown West and Tubber Lane, are well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. The sites at St. Edmondsbury (sic), Liffey Valley and Coldcut are served by a variety of radial and orbital services while the site at the Foxhunter could potentially be served	• the Specific Local Objective ensures that development is masterplan-led, phased and integrated with infrastructure and environmental considerations; and • the application of the Development Plan and national guidelines ensures that development will be controlled, appropriate in scale and responsive to its context. Furthermore, and with respect to the information outlined later in this section regarding the SEA and submissions received, the Chief Executive is recommending revising the residential zoning extent to align with the lands to west of the Avenue (access road) to further acknowledge the sensitives of the surrounding lands. **Policy and Phasing** The issues raised in submissions regarding policy alignment and phasing are acknowledged, particularly the concerns that the proposed rezoning may be premature in advance of the completion of Adamstown SDZ and Clonburris SDZ, and the delivery of associated infrastructure. However, it is important to note that the current review of the Development Plan and Proposed Variation is being undertaken in response to the Section 28 Ministerial Guidelines on Housing Growth Requirements (2025), which give statutory effect to the National Planning Framework (NPF), requiring Planning Authorities to review their zoning provisions to ensure that sufficient and appropriately located lands to meet revised housing targets. Lucan forms part of the Dublin Metropolitan Area, where national policy directs significant population growth to be accommodated in a compact and coordinated manner. The availability of suitably located

effectively by the same services, subject to details of any emerging development proposal. In this context, submissions argue that further residential development, without the prior delivery of high-capacity public transport infrastructure, would reinforce car dependency and place additional pressure on already constrained road networks. The cumulative effect of growth without corresponding transport investment is therefore viewed as undermining sustainable mobility objectives in the Lucan area. **Biodiversity, Green Infrastructure and Parks and Open Space** Biodiversity, green infrastructure and open space considerations represent the most consistently and strongly expressed issue across submissions relating to St. Edmundsbury. The lands are widely described as forming an integral component of the Liffey Valley green infrastructure network, acting as a strategic ecological corridor linking St. Catherine's Park, Lucan Demesne and downstream habitats along the River Liffey. Submissions emphasise the presence of extensive ecological features, including mature oak and beech woodlands, historic demesne planting, hedgerows, and riparian habitats, which collectively support a wide range of species. These include bats, otters, badgers, foxes, kingfishers, herons, buzzards, kites,	lands, in proximity to existing urban areas and transport corridors, is a key factor in identifying locations for growth within this framework. The identification of St. Edmundsbury reflects its location within the metropolitan area of Dublin, its proximity to an established settlement (Lucan), and its capacity to be considered within the broader framework of compact growth envisaged by the NPF. The process therefore aligns with national policy which requires that planning authorities plan proactively for future growth, including the identification of lands that may contribute to housing delivery within the lifetime of the Development Plan and beyond. In relation to phasing, it is recognised that submissions emphasise an "infrastructure-first" approach. In this regard, it is considered that the South Dublin County Development Plan 2022–2028, in combination with the Specific Local Objective (SLO) for St. Edmundsbury, provides a clear and enforceable framework to ensure that development is appropriately sequenced and delivered in a coordinated manner. The SLO establishes a number of pre-conditions which must be met prior to the progression of development, including: • the requirement for the delivery of a Liffey Valley park in tandem with, or in advance of, residential development; • the preparation of a comprehensive masterplan for the lands, to be agreed with the Planning Authority in advance of any application; and • the completion of detailed ecological, landscape, heritage and transport assessments, ensuring that development capacity and layout are informed by the receiving environment and infrastructure constraints.

trout and salmon, as well as species associated with woodland and riverine ecosystems such as pine marten and pygmy shrew. The lands are identified as providing critical habitat, foraging routes and ecological connectivity within an increasingly urbanised environment. In this context, submissions express concern that the proposed rezoning would result in the *"permanent and irreversible loss"* of habitat, fragmentation of wildlife corridors, and a reduction in overall biodiversity resilience. The cumulative impact of development across the wider Lucan–Adamstown area, including Adamstown SDZ and Clonburris SDZ, is highlighted as already having diminished the extent and functionality of interconnected ecological networks, placing increased importance on the remaining undeveloped lands at St. Edmundsbury. The lands are also consistently described as a valued informal park and "green lung" for the Lucan area. Submissions highlight their daily use for walking, recreation, nature-based education (including forest school activities), and general wellbeing, noting the role of the lands in supporting both physical and mental health. This amenity function is considered particularly important given the limited availability of accessible open space in the area and the cumulative erosion of green space over recent decades due to successive development.	These provisions ensure that development will not proceed in a piecemeal or premature manner, but will instead be plan-led, evidence-based and phased in line with infrastructure provision and environmental capacity. The SLO therefore directly addresses concerns raised in submissions regarding the sequencing of development and ensures that the delivery of key infrastructure and amenity is integral to, and not subsequent to, residential development. Furthermore, the broader Development Plan framework requires that all development proposals are assessed against policies relating to transport capacity, infrastructure provision, environmental protection and community facilities, ensuring that cumulative impacts are considered as part of the decision-making process. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone framework represents best practice in the coordinated delivery of largescale residential communities. These areas have been planned and phased to deliver community facilities, transport infrastructure and open space in tandem with population growth. This coordinated, urban design-led approach supports efficient use of land and transit-oriented development and has informed the Council's approach to managing future growth. In summary, while concerns regarding policy consistency and phasing are acknowledged, it is considered that: • the proposed rezoning arises from a statutory requirement to implement Section 28 Guidelines and the NPF, including increased housing targets;

St. Edmundsbury is therefore characterised not only as an ecological asset, but also as a key element of the local open space network, functioning as one of the last substantial accessible green areas outside formal parks. Its potential loss is framed as irreversible in both environmental and social terms, with submissions emphasising that replacement of such mature, multifunctional landscapes cannot be readily achieved within new development contexts. Overall, submissions consistently present St. Edmundsbury as a critical intersection of biodiversity, green infrastructure and community amenity, whose protection is considered essential in maintaining ecological connectivity, environmental quality and liveability within the wider Lucan–Liffey Valley landscape, particularly in light of cumulative development pressures across the area. **Environment** Environmental concerns extend beyond biodiversity to include air quality, soil sealing and water quality. Increased traffic and tree loss are cited as negatively affecting air quality in Lucan Village and along the Lucan Road. Submissions argue that cumulative environmental degradation has already occurred due to decades of development, with St. Edmundsbury representing a remaining environmental buffer whose loss would have county-scale implications for landscape quality.	• the inclusion of St. Edmundsbury forms part of a strategic, county-wide review of zoned land, rather than representing premature isolated expansion; and • the combination of the Development Plan and the Specific Local Objective provides a robust mechanism to ensure that development is appropriately phased, infrastructure-led and environmentally informed. Accordingly, it is considered that the proposed approach is consistent with national policy and provides a structured and managed approach for development, addressing the issues raised in submissions regarding prematurity and policy alignment. **Transport** The transport-related concerns raised in submissions are acknowledged, particularly those relating to active travel conditions, parking pressures, traffic congestion and public transport provision within the Lucan–Adamstown area. These concerns are largely framed in cumulative terms, reflecting the scale of development in Adamstown SDZ and Clonburris SDZ and the associated pressure on existing infrastructure. Furthermore, The Planning Authority acknowledges that issues relating to bus overcrowding, perceived service unreliability and capacity constraints on rail services—particularly during peak periods—are matters of genuine concern to residents across the wider Lucan–Adamstown area. The submissions referencing service changes arising from the implementation of BusConnects, including changes to routes and extensions of services to Adamstown, are also noted. However, it is considered that the Specific Local Objective (SLO), together with the South Dublin County Development Plan 2022–2028 (CDP) and national and regional transport policy, provides a structured,

The Department of Housing, Local Government and Heritage (DHLGH), through the NPWS, highlights that the lands at St. Edmundsbury, proposed for rezoning from High Amenity (HA-LV) to residential, are of high ecological sensitivity, given their proximity to the Liffey Valley proposed Natural Heritage Area (pNHA) and Special Amenity Area. The DAU welcomes the inclusion of an SLO due to concern regarding the likely reduction in biodiversity across multiple sites, with potential impacts on species such as badgers, bats, otters, amphibians, birds, and protected plant species. Key risks identified include habitat loss, disturbance from inappropriate lighting (particularly affecting bats), and encroachment into sensitive ecological corridors. To address these issues, it is recommended that biodiversity protection be fully integrated into all development proposals, that lighting in sensitive areas be designed to be bat-friendly, motion-activated, and avoid spill into natural habitats, and that strong ecological buffers—especially near protected areas—be maintained or enhanced. Furthermore, all development should be guided by comprehensive ecological assessments to ensure informed and sustainable outcomes. The St. Edmundsbury variation site proposes the rezoning of lands from High Amenity (HA-LV) to New Residential (RES-N) adjacent to the Liffey Valley pNHA and Special Amenity Area, an area of high ecological value. The site supports important	phased and integrated framework to ensure that development of St. Edmundsbury is appropriately aligned with transport capacity and infrastructure delivery. The land use and transport approach is consistent with the national "Avoid–Shift–Improve" framework, supporting compact settlement patterns that reduce the need to travel, enable a shift to public transport and active travel, and improve network efficiency through coordinated infrastructure and operational measures. At a strategic level, SDCC continues to liaise closely with the National Transport Authority (NTA), Iarnród Éireann and other key stakeholders in relation to the delivery of major public transport and active travel projects within the county, including DART+ South West, BusConnects, and a programme of active travel interventions. These projects are central to improving public transport capacity, reliability and connectivity for the Lucan area, and to supporting climate action through the necessary long-term modal shift away from private car dependency. <u>Active Travel</u> The concerns raised regarding the safety and quality of walking and cycling infrastructure, particularly along Lucan Road, Chapel Hill and connections to Lucan Village, are acknowledged. This approach is supported by an ongoing programme of active travel investment being delivered across the county in partnership with the National Transport Authority. This includes the delivery of new and improved pedestrian and cycling infrastructure, enhancement of strategic greenway connections, and the integration of active travel routes within existing and emerging communities, including

biodiversity features including a badger sett within escarpment woodland, significant bat activity, and the presence of the protected plant species Hairy St. John's-wort along the River Liffey. The proposed rezoning raises concerns regarding potential loss or degradation of these habitats. There is strong support for the inclusion of a Specific Local Objective requiring the delivery of a park between the residential lands and the river, to be provided in tandem with or in advance of development. It is recommended that the park be designed to protect and retain biodiversity, and that any works in proximity to the protected plant species be subject to licensing by the National Parks and Wildlife Service. Lastly, Inland Fisheries Ireland (IFI) raises key concerns regarding the protection of water resources and aquatic ecosystems, noting that the Strategic Environmental Assessment (SEA) does not fully address obligations under the EU Nature Restoration Regulation, including preventing loss of green infrastructure and biodiversity. IFI also highlights the need to comply with the Water Framework Directive, particularly the requirement to prevent deterioration in water quality. Concerns are expressed that the SEA does not adequately consider the long-term maintenance of SuDS, with insufficient maintenance potentially increasing flood risk and adverse impacts on water quality and aquatic habitats.	connections to the Grand Canal Greenway and wider Lucan–Clonburris–Adamstown network. These interventions extend beyond site-specific design and form part of a broader programme to improve connectivity, safety and accessibility for all users. In response, the Planning Authority notes that the SLO requires a masterplan-led approach, ensuring that: • the site is integrated into existing and planned active travel networks, including connections to the Liffey Valley corridor and wider green infrastructure network; • opportunities for safe, off-road walking and cycling routes are maximised through the delivery of the Liffey Valley park and associated green links; and • internal layouts are designed in accordance with the Design Manual for Urban Roads and Streets (DMURS), prioritising pedestrians and cyclists, reducing vehicle dominance and enhancing safety. The Council also notes the continued rollout of countywide active travel investment and linkages to strategic routes such as the Grand Canal Greenway, which will enhance connectivity to services, schools and amenities. This approach aligns with National Strategic Outcome 5 (Sustainable Mobility) and National Policy Objective 93, supporting a shift towards more sustainable travel modes and improved quality of life. <u>Parking</u> Concerns regarding parking pressures in Lucan Village and surrounding residential areas are acknowledged.

Heritage and Archaeology Heritage and archaeology considerations are raised consistently across submissions, with particular emphasis on the cultural, architectural and landscape significance of St. Edmundsbury and its relationship with the wider Liffey Valley and Lucan Village. St. Edmundsbury is identified as containing a number of Registered Protected Structures (RPS) of architectural and historic importance, for clarity these are included below: • **RPS 003** – St. Edmondsbury House, a three-storey house with porch colonnades and associated out-offices; • **RPS 008** – Barn and Coach House; • **RPS 010** – Detached two-storey house and stable block; • **RPS 012** – Walled Garden; and • **RPS 013** – Limestone boundary wall with attached bell tower. Submissions emphasise that these structures form part of a cohesive historic demesne landscape, whose significance extends beyond the buildings themselves to include their setting, curtilage, views, and spatial relationships within the Liffey Valley. The lands are also situated adjacent to the Liffey Valley Special Amenity Area Order (SAAO), which is recognised as an area of high scenic, ecological and cultural value.	The approach to car parking in the County is directly informed by national planning policy and reflects a clear shift towards supporting sustainable transport and reducing reliance on the private car. The South Dublin County Development Plan 2022–2028 adopts maximum (not minimum) car parking standards, which are applied on a location-based, accessibility-led approach. These standards vary across the County depending on access to public transport and services. National policy, particularly the Sustainable Residential Development and Compact Settlements Guidelines (2024), reinforces this approach and introduces Specific Planning Policy Requirements (SPPRs) which planning authorities are required to apply. Future development proposals must demonstrate compliance with these standards, having regard to site accessibility, density and availability of alternative transport modes. <u>Traffic and Roads</u> The concerns raised regarding congestion on the N4, Lucan Road, Newcastle Road, Griffeen Road, the Outer Ring Road and Lucan Village bridge are acknowledged. The Planning Authority recognises: • existing peak-hour congestion on the strategic and local road network; • capacity constraints at key junctions and corridors; and • the cumulative impacts of development in the wider area. The Planning Authority is advancing a comprehensive transport study for the west of the County, supported by district and neighbourhood level assessments. This work is examining cumulative development impacts across the Lucan–Adamstown–Clonburris area, including all existing and proposed zoned lands, to inform a coordinated transport

In this context, submissions argue that the proposed rezoning would erode the historic character and legibility of the estate, and weaken the established relationship between Lucan Village, the River Liffey, demesne landscapes, and associated historic features, including bridges, mills and river-based infrastructure. Reference is made to the broader historic context of the area, including connections to Shackleton's Mill and the historic Liffey crossings, which collectively contribute to the identity and heritage value of Lucan. The cumulative impact of development in the area is highlighted as gradually diminishing these relationships and eroding the distinct character of the Liffey Valley landscape. Archaeological concerns are raised in tandem with built heritage issues. While specific Recorded Monuments are not consistently identified, submissions emphasise that the site lies within a historically sensitive riparian landscape, in proximity to Lucan's historic core and established settlement patterns. It is contended that insufficient archaeological and cultural landscape assessment has been undertaken to justify rezoning, and that development may pre-empt further investigation of potential archaeological remains. Submissions also highlight that the incremental loss of undeveloped lands along the river corridor reduces the opportunity for meaningful archaeological assessment and limits the ability to	strategy. The study will provide an evidence-based framework for engagement with the NTA and other agencies on future transport infrastructure, network capacity and investment priorities, ensuring that future growth is supported by a clear understanding of movement patterns and infrastructure requirements at an area-wide level. While strategic infrastructure projects such as DART+ South West and BusConnects represent medium to longer-term interventions, the Council is also progressing ongoing local and corridor-based improvements aimed at supporting network function in the shorter term. These include junction upgrades, public realm improvements, and active travel linkages which collectively improve accessibility and reduce reliance on the private car, while longer-term capacity enhancements are delivered. The Planning Authority emphasises that zoning does not predetermine traffic outcomes, and that detailed assessment at planning application stage, informed by CDP policies, DMURS and transport guidance, will ensure that development is appropriately managed. The zoning approach for these lands is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, village centres, public transport routes and parks (including Lucan House). This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Council-led public realm improvements within Lucan Village and the delivery of parks and amenity infrastructure at Lucan House

interpret the historic evolution of the Liffey Valley as a connected cultural landscape. Overall, heritage and archaeology concerns are framed not only in terms of potential impacts on individual structures, but also in relation to the wider cultural landscape, historic setting and cumulative erosion of heritage value within Lucan and the Liffey Valley. **Community and Social Facilities, and Schools** Issues relating to community and social infrastructure, including schools, are consistently raised across submissions and are strongly interlinked, with particular emphasis on the existing capacity constraints in the wider Lucan–Adamstown area. Submissions highlight that primary and post-primary school provision is already under significant pressure, with specific reference made to Lucan Community College, where capacity constraints and admission notices are cited as evidence of limited availability. It is noted that school-place shortages are not confined to a single level, but affect both primary and secondary education, with growing populations from Adamstown SDZ and Clonburris SDZ contributing to sustained demand. In this context, it is argued that the addition of further residential development at St. Edmundsbury would exacerbate an already critical situation, particularly as existing	support improved walkability and local accessibility, complementing the transport strategy by enabling shorter trips and supporting the shift to sustainable travel modes where feasible. <u>Public Transport</u> Submissions highlighting perceived deficiencies in public transport provision, including bus capacity and reliability, are acknowledged. However, the Planning Authority notes that St. Edmundsbury is located within an area that is served and will be significantly enhanced by strategic public transport investment, including: BusConnects Core Bus Corridors (Lucan and Liffey Valley); • DART+ South West, for which a Railway Order was approved in November 2024 and which remains a key national infrastructure project; • the future Luas Lucan scheme; and • wider investment under the Greater Dublin Area Transport Strategy 2022–2042. The Core Bus Corridor programme for Lucan and Liffey Valley will provide dedicated bus priority measures, improving journey time reliability and enabling increased service capacity over time. This is a key component of the broader public transport strategy for the area and will support modal shift by providing a more consistent and attractive alternative to car-based travel. The Council strongly supports the delivery of these projects and recognises their transformative role in supporting sustainable mobility, reducing car dependency and enabling compact growth. While timelines for certain projects, including DART+ South West, have extended beyond earlier projections, their strategic importance remains

SDZ areas are not yet fully built out and continue to generate new demand for school places. Community and social facilities are also highlighted as an area of concern, with submissions referring to deficits in childcare provision, primary healthcare (GP services), youth facilities, sports infrastructure and recreation amenities. These services are described as operating at or beyond capacity, with limited evidence of commensurate expansion to match population growth. The long-delayed delivery of the Lucan Swimming Pool is repeatedly cited as a key example of historic under-delivery of planned infrastructure, contributing to reduced confidence in the timely provision of future community facilities. Submissions frame these issues in cumulative terms, noting that the combined impact of Adamstown SDZ, Clonburris SDZ and other zoned lands has already placed significant pressure on available services. In this context, the proposed rezoning at St. Edmundsbury is viewed as intensifying demand without clear or identified mechanisms for the delivery of additional community and social infrastructure. The Department of Education and Youth (DOEY) noted in their submission that the proposed rezonings in the wider Lucan area, including St. Edmundsbury, contribute to a significant increase in residential capacity (c. 4,400 additional units), with the potential to generate population growth of	unchanged, and the Council will continue to engage with relevant agencies to support their delivery. It is recognised that public transport service provision, including service frequency, routing and capacity, is the responsibility of the National Transport Authority (NTA) and associated operators. The role of the Planning Authority is to ensure that land use planning supports and integrates with existing and planned transport infrastructure, and to work proactively with the NTA and other stakeholders to ensure that future demand arising from population growth is identified, planned for and addressed through the delivery of appropriate transport interventions in line with national and regional transport strategies. <u>Conclusion</u> In summary, while the transport concerns raised in submissions are acknowledged, it is considered that: • the Specific Local Objective provides a robust framework to ensure development is masterplan-led, phased and transport-integrated; • active travel, public transport and sustainable mobility principles are embedded in both the SLO and the Development Plan; • significant strategic transport investment (BusConnects, DART+ South West, Luas Lucan and active travel networks) will enhance accessibility and capacity over time; and • all development proposals will be subject to rigorous, site-specific assessment, including transport, parking and traffic considerations, in line with the CDP and national policy. Furthermore, the NTA response is noted by the Council, and therefore it is considered that the above, subject to the SLO and development plan

approximately 10,000–13,000 people. This level of growth has clear implications for educational infrastructure provision, likely necessitating additional primary and post-primary school capacity, depending on demographic demand. In this context, the Department emphasises the need for ongoing coordination with South Dublin County Council to ensure that school provision is planned in a timely, strategic and area-wide manner, with implications that all sites, including St. Edmundsbury, must be supported by forward planning for adequate school capacity alongside development. Overall, the issue is presented as one of infrastructure lag relative to population growth, with submissions emphasising that further residential development, in the absence of clearly defined and deliverable provisions for schools and community facilities, would lead to increased service deficits and a decline in quality of life for existing and future residents in the Lucan area. **Flooding and Riparian Corridor (inclusive of SFRA commentary)** Issues relating to the riparian corridor, flood risk and surface water management are consistently raised across submissions in relation to St. Edmundsbury, with strong emphasis on the site's location within the River Liffey corridor and its role in flood attenuation, ecological connectivity and green infrastructure provision.	policies and objectives, and acknowledgment that St. Edmundsbury is well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor scheme. Accordingly, it is considered that the proposed approach ensures that development at St. Edmundsbury will be delivered in a coordinated, sustainable and policy-aligned manner, supporting improved mobility outcomes while addressing existing and future transport demands within the wider Lucan–Adamstown area **Biodiversity, Green Infrastructure and Parks and Open Space** The concerns raised in submissions regarding biodiversity, green infrastructure and the role of St. Edmundsbury as a valued open space and environmental resource are acknowledged. Submissions consistently identify the lands as forming part of the wider Liffey Valley green infrastructure network, providing ecological connectivity between St. Catherine's Park, Lucan Demesne and downstream habitats, and functioning as an informal recreational space and "green lung" within an increasingly urbanised part of the County. Concerns are expressed that rezoning would result in the irreversible loss of mature habitats, fragmentation of wildlife corridors and the erosion of both environmental and amenity value, particularly when considered cumulatively with development across the Lucan–Adamstown area. It is acknowledged that a significant number of submissions object to the proposed zoning, emphasising the historical function of St. Edmundsbury as a High Amenity landscape, forming part of the wider Liffey Valley Special Amenity Area Order (SAAO) and acting as a green buffer between urban areas and the river corridor. Submissions

Submissions describe the Liffey corridor as a critical multifunctional asset, serving not only as an ecological linkage within the wider green infrastructure network, but also as a natural floodplain and flood storage area during high-water events. In this context, St. Edmundsbury is characterised as forming part of a riparian zone, contributing to the management of fluvial and pluvial flood risk and supporting downstream catchments. Development within this corridor is therefore viewed by submitters as fundamentally incompatible with the long-term protection and enhancement of the Liffey Valley, particularly given its designation as part of a sensitive and high-amenity landscape. Flooding concerns are framed both in terms of existing conditions and future climate risk. Submissions reference recent flood events affecting the Liffey catchment and express concern that rezoning does not adequately account for increased rainfall intensity and climate change impacts. It is argued that the lands currently function as a natural buffer, absorbing and slowing floodwaters, and that development would displace this capacity, leading to increased flood risk both locally and downstream, particularly in Lucan Village, Palmerstown and the wider Liffey corridor. These concerns are closely linked to the Strategic Flood Risk Assessment (SFRA) framework, with submissions questioning whether the rezoning fully reflects the precautionary	also highlight the ecological, recreational and heritage value of the lands and express concern that residential development would erode these functions and contribute to cumulative environmental and infrastructure pressures in the Lucan area. The Planning Authority considers that the proposed zoning must be viewed in conjunction with the Specific Local Objective (SLO), which establishes a comprehensive and enforceable framework to ensure that biodiversity, green infrastructure and open space are not only protected but significantly enhanced as part of any future development. Central to this approach is the requirement under the SLO for the delivery of a substantial park within the Liffey Valley on lands zoned HA-LV, extending to the River Liffey and incorporating lands to the north and west of St. Patrick's Hospital grounds, together with connections to Lucan Village and Chapel Hill. This park is required to be provided in tandem with, or prior to, any residential development, ensuring that the sensitive and strategically important lands within the valley are secured, protected and enhanced at the earliest stage. This provision directly addresses concerns regarding the loss of open space by delivering a permanent, publicly accessible amenity and green infrastructure asset of significant scale, thereby strengthening ecological connectivity and recreational provision rather than diminishing it. It is noted that the current use of the future park is predominantly used for tillage. The SLO further requires that any development is brought forward on the basis of a comprehensive masterplan, prepared in consultation with and approved by the Planning Authority, and informed by detailed technical assessments. These include a full Ecological Impact Assessment, addressing the presence and movement of species such as

principle and the cumulative flood impacts of development along the river. Surface water management is also identified as a key issue. Submissions highlight that the existing lands at St. Edmundsbury are largely permeable and vegetated, facilitating infiltration and runoff attenuation. The potential loss of these characteristics through development is linked to increased surface water runoff, localised flooding and downstream impacts, particularly during extreme weather events. It is argued that cumulative loss of such lands across the Lucan–Adamstown area could significantly reduce the capacity of the landscape to manage surface water naturally. Overall, submissions present these issues in a strongly cumulative context, emphasising the interaction between riparian function, flood risk, and surface water management, and highlighting the importance of maintaining the integrity of the Liffey Valley corridor. The lands at St. Edmundsbury are therefore viewed as a critical component of the wider flood management and green infrastructure system, whose alteration or loss could have significant environmental and flood risk implications both locally and at catchment scale. **Tourism, Retail and Employment** Submissions raise a combined concern in relation to tourism, retail vitality and employment patterns,	bats, otters and badgers, the retention and enhancement of historic hedgerows and tree lines, and a landscape and historical character assessment. This ensures that the site is developed on a landscape-led and ecologically informed basis, with biodiversity and green infrastructure forming the primary structure of the development. Issues raised in submissions regarding habitat loss, lighting impacts and ecological disturbance will be addressed through these assessments, supported by ongoing engagement with relevant expertise including the Council's Parks and Public Realm Section and Biodiversity Officer, and, where necessary, statutory bodies such as the National Parks and Wildlife Service. This approach is consistent with the policies of the South Dublin County Development Plan, including those relating to the protection of the Liffey Valley SAAO, the enhancement of green infrastructure networks, and the requirement that development within high amenity and sensitive landscapes be informed by landscape impact assessment and capacity-based design. It also aligns with National Strategic Outcome 7 of the National Planning Framework, which promotes the provision of high-quality public realm, parks and recreational infrastructure integrated with the natural and cultural environment, and recognises the role of green and blue infrastructure in improving environmental resilience, biodiversity and quality of life. In addition to the strategic park provision, any future development will be required to deliver public and private open space in accordance with national guidelines and Development Plan standards, ensuring that both existing and future residents benefit from accessible and high-quality amenity provision. These requirements will be refined and secured through the masterplan process and application assessment.

primarily framed within the context of cumulative development pressures in the Lucan–Adamstown area rather than as standalone issues. Retail considerations are referenced in terms of the functioning of Lucan Village as a local centre, with submissions noting that existing congestion, traffic delays and the cumulative impact of recent residential growth have already diminished accessibility, footfall and overall attractiveness. It is contended that further population increase, without corresponding investment in transport infrastructure and public realm improvements, would continue to undermine the role of the village as a viable retail and service hub, thereby impacting its long-term vitality. Employment issues are raised almost exclusively in the context of commuting patterns rather than local job provision. Submissions state that the proposed rezoning at St. Edmundsbury would contribute to increased outbound commuter flows towards Dublin City and other employment centres, thereby placing additional pressure on key strategic routes including the N4, M50 and associated radial corridors. The absence of a corresponding increase in local employment opportunities is identified as reinforcing car dependency and contributing to unsustainable travel behaviours, particularly when considered alongside existing development at Adamstown and Clonburris.	In summary, while the concerns raised in relation to biodiversity loss, green infrastructure fragmentation and the loss of informal open space are noted, it is considered that the Specific Local Objective provides a robust, enforceable and environmentally-led framework that fundamentally reshapes how the lands will be developed. The requirement for the early delivery of a Liffey Valley park, combined with comprehensive ecological and landscape assessment and design-led mitigation and enhancement, ensures that the development of St. Edmundsbury will be structured around the protection and strengthening of biodiversity, green infrastructure and amenity value, thereby responding to the issues raised in submissions in a comprehensive and plan-led manner. In addition, the extent of zoning for residential use is a direct response to the topography and sensitivity of the area. **Environment** The environmental concerns raised in submissions have been carefully considered, particularly in relation to air quality, landscape character, biodiversity, water quality and the cumulative environmental pressures affecting the Lucan–Liffey Valley area. It is acknowledged that submissions identify St. Edmundsbury as an important environmental buffer within the Liffey Valley, contributing to local air quality, visual amenity and landscape character, and that concerns are expressed regarding the cumulative loss of such lands over time through successive development. Issues relating to traffic-related emissions along Lucan Road and within Lucan Village, as well as the potential for soil sealing, increased runoff and urbanisation pressures, are noted. Concerns are also raised regarding potential impacts on ecological features and species, including badgers, bats, otters and protected flora, together with the sensitivity of the site's

Tourism and recreation also feature within submissions, with particular emphasis on the Liffey Valley as a strategic amenity and tourism asset. The valley is described as supporting walking routes, heritage landscapes and broader leisure use, contributing to both local quality of life and regional tourism potential. Submissions express concern that the rezoning and subsequent development of St. Edmundsbury could diminish the environmental and visual integrity of the Liffey Valley, thereby undermining its role as a destination for recreation and heritage-based tourism. Taken together, these issues are consistently framed in cumulative terms, with submissions highlighting that continued growth without integrated transport, employment and public realm improvements risks undermining the functional role of Lucan Village, increasing unsustainable commuting patterns, and eroding the long-term tourism and amenity value of the Liffey Valley**.** **Utilities, Water and Wastewater** Submissions consistently raise concerns regarding the capacity of utilities infrastructure, particularly drainage, water services and electricity supply, in the context of the cumulative scale of development across the Lucan–Adamstown–Clonburris area. A recurring theme is that existing infrastructure is already under significant pressure, with submitters	location adjacent to the Liffey Valley pNHA and Special Amenity Area Order (SAAO). However, it is considered that the proposed zoning must be viewed in conjunction with the Specific Local Objective (SLO) which establishes a comprehensive and precautionary framework for addressing these environmental issues. In particular, the SLO requires the delivery of a substantial Liffey Valley park on HA-LV lands to the north and west of the RES-N site, extending to the River Liffey and incorporating connections towards Lucan Village and Chapel Hill. The requirement that this park be delivered in advance of, or in tandem with, residential development represents a fundamental environmental safeguard, ensuring that the lands closest to the river and most sensitive in ecological and landscape terms are protected, enhanced and placed in long-term public ownership and management. The SLO further requires that any development is informed by a robust suite of environmental and design-based assessments, including: • A detailed Ecological Impact Assessment, addressing usage by mobile species and identifying mitigation and enhancement measures; • The retention and enhancement of historic hedgerows and tree lines, forming part of the site's ecological and landscape framework; • A local landscape and historical character assessment; and • A Design Statement and masterplan framework responding to the site's environmental sensitivities and setting. These requirements ensure that biodiversity protection is embedded within the design and layout of development, rather than addressed as a post-design mitigation measure. Matters raised in submissions

questioning whether current and planned networks are adequate to support further growth. In particular, water and wastewater capacity is identified as a key strategic constraint. Submissions argue that the scale of development already permitted and under construction within Adamstown SDZ and Clonburris SDZ has placed considerable demands on existing systems, and that infrastructure upgrades have not always kept pace with population growth. In this context, St. Edmundsbury is viewed as contributing to an already stressed system, with concerns that additional development would exacerbate existing issues unless capacity is demonstrably increased in advance. Concerns are also raised regarding the timing and certainty of infrastructure delivery, with submissions calling for clear evidence that sufficient wastewater treatment capacity, water supply and drainage infrastructure will be available to support any additional residential development. The absence of confirmed upgrade programmes or timelines is cited as a key concern, leading to the view that further rezoning should not proceed without firm assurances that utilities infrastructure can accommodate projected demand. More broadly, submissions question whether infrastructure provision is keeping pace with cumulative growth, noting that the combined impact	regarding lighting impacts on bat populations, habitat disturbance, and ecological corridor protection will be addressed through these assessments and will be further informed by engagement with relevant statutory bodies, including the National Parks and Wildlife Service (NPWS) and internal Council expertise such as the Biodiversity Officer. Any works in proximity to protected species or habitats, including protected plant species, will be subject to appropriate licensing requirements and regulatory oversight. In addition, the Council is guided by the objectives of the South Dublin County Development Plan 2022–2028, particularly those relating to: • The protection of the Liffey Valley SAAO, which is recognised as an area of outstanding natural, ecological and landscape value; • Policy NCBH7, which requires that development within the Liffey Valley avoids impacts on landscape character and ecological networks, maximises enhancement opportunities, and supports the creation of interconnected parklands; and • The requirement for Landscape Impact Assessment in high amenity and sensitive landscapes, ensuring that the capacity of the landscape to accommodate change is fully assessed and that development is appropriately scaled, sited and designed. The SLO is aligned with these policies and ensures that development is subject to a landscape-led and capacity-based approach, taking account of the sensitivity of the Liffey Valley landscape and the ability of the receiving environment to accommodate change without loss of its intrinsic character. The approach also aligns with National Strategic Outcome 7 (NPF), which emphasises the importance of enhanced amenity and environmental quality, including the delivery of well-designed public

of multiple large-scale developments across the area has already placed pressure on networks and services. Utilities are therefore framed not as a site-specific issue, but as part of a wider, cumulative challenge affecting the sustainability of development in the Lucan–Adamstown area. UE confirmed via submission responses to the consultation on the variation, that the assessment of infrastructure at St. Edmundsbury identifies potential requirements for local upgrades to both water supply and wastewater networks, which may be developer-led depending on the scale and density of development and the point of connection. Key concerns raised in submissions within the Council's remit relate to surface water runoff, groundwater protection and construction impacts, while broader network capacity issues fall under the remit of Uisce Éireann. The primary issue identified is pressure on infrastructure, with the response confirming that upgrades may be required but can be addressed through standard development-led mechanisms where no existing Uisce Éireann projects are in place. In relation to wastewater capacity, it is noted that the recent upgrade of the Ringsend Wastewater Treatment Plant is sufficient to accommodate needs over the lifetime of the current Development Plan, although local network considerations will still need to be addressed at project stage.	realm, parks, green infrastructure and recreational assets that support quality of life. The requirement to deliver a new Liffey Valley park, integrated with existing green infrastructure, directly supports this objective and ensures that development contributes positively to environmental quality and amenity provision in the Lucan area. It is considered that the above factors, SLO and policy approach for the site, ensure that the concerns flagged by NPWS of DHLGH and the Inland Fisheries Ireland are dealt with in an appropriate manner. Furthermore, in regard to the IFI submission, it is considered that the SLO safeguards the lands against the concerns raised, mainly through the implementation of the UE required infrastructure masterplan for the site. In summary, while the environmental concerns raised in submissions are acknowledged, it is considered that the proposed zoning, when read in conjunction with the Specific Local Objective and Development Plan policy framework, provides a robust, enforceable and environmentally-led structure for the development of St. Edmundsbury. The requirement for: • early delivery of a substantial park and green infrastructure network, • comprehensive ecological and landscape assessment, and • ongoing engagement with relevant statutory and internal environmental expertise, • ensures that environmental considerations are addressed proactively and at the earliest stages of planning, and that the integrity of the Liffey Valley as a key natural, cultural and recreational asset is protected and enhanced, rather than diminished, as part of any future development.

Overall, the issue is presented as one of capacity, sequencing and infrastructure-led growth, with a clear emphasis on the need to ensure that utilities—particularly water and wastewater systems—are fully capable of supporting development before additional lands are brought forward, and that infrastructure provision occurs in parallel with, rather than subsequent to, residential growth. **Climate Action** Climate action considerations are raised consistently across submissions, with concerns primarily focused on the cumulative environmental impacts of rezoning at St. Edmundsbury within the wider Lucan–Adamstown area. Submissions link the proposal to increased car dependency, noting that the location is perceived as insufficiently served by high-capacity public transport, thereby potentially reinforcing reliance on private vehicles and contributing to higher emissions. A central concern relates to the potential loss of existing greenfield lands, including mature trees, vegetation and permeable soils, which are identified as providing important natural carbon sequestration and climate-adaptation functions. Submissions emphasise that these lands currently contribute to surface water attenuation, local cooling, air quality improvement and biodiversity support, and argue that their removal would reduce climate resilience	**Heritage and Archaeology** The concerns raised in submissions regarding the heritage and archaeological significance of St. Edmundsbury are acknowledged, particularly its role as a historic demesne landscape, its relationship with Lucan Village and the River Liffey, and the presence of multiple Protected Structures (RPS) within the site. Submissions emphasise that the lands form part of the wider Liffey Valley cultural landscape, including associations with historic crossings, mills such as Shackleton's Mill, estate landscapes and river-based settlement patterns, and express concern that rezoning could erode the setting, views and spatial relationships which define this character, particularly when considered cumulatively alongside development in the wider Lucan–Adamstown area. However, it is considered that the proposed zoning must be read in conjunction with the Specific Local Objective (SLO), which establishes a comprehensive, plan-led and heritage-focused framework to guide any future development of the lands. The SLO requires that development is informed by a masterplan, to be prepared in consultation with, and approved by, the Planning Authority in advance of any planning application. This masterplan must include a local landscape and historical character assessment and a Design Statement specifically addressing the setting, curtilage and special interest of the Protected Structures on the site. These provisions ensure that development is context-led, with the architectural and cultural significance of St. Edmundsbury and its associated structures guiding the layout, scale and design of any proposal. The SLO further requires the delivery of a Liffey Valley park on HA-LV zoned lands, extending to the River Liffey and incorporating enhanced connections to Lucan Village and Chapel Hill, to be provided in advance

and increase vulnerability to urban heat effects and extreme weather events. Flood risk and water management are also highlighted in the context of climate change. Submissions reference recent flooding events within the Liffey catchment, including Council flood warnings issued in January 2026, and contend that the rezoning of lands in proximity to the river may undermine climate adaptation and flood management objectives, particularly through increased surface water runoff and the potential loss of natural flood attenuation capacity. Overall, submissions frame climate action as a cumulative and strategic issue, linking the rezoning of St. Edmundsbury to broader concerns regarding loss of green infrastructure, increased emissions, and reduced resilience to climate change, particularly in an area already experiencing significant development pressure. **Miscellaneous** <u>Personal Attachment / Memory</u> A significant number of submissions outlined a sentimental connection to the lands at St. Edmunsbury, relating to childhood memories and continued use as an area of continuous use over the last number of decades, notably during Covid. Additionally, a number of submissions note the historic use of the area for agriculture and the loss of	of or in tandem with residential development. This requirement is of particular importance in heritage terms, as it ensures that the setting of the Protected Structures and the wider demesne landscape is preserved within an open, legible and publicly accessible landscape framework, maintaining the historic relationship between the built form, the river corridor and the surrounding lands. The provision of this park will also enable the enhancement and interpretation of the cultural landscape, supporting public appreciation of the heritage assets and reinforcing the identity of the Liffey Valley. In relation to archaeology, while specific Recorded Monuments are not consistently identified within submissions, the location of St. Edmundsbury within a historically sensitive riparian context is acknowledged. The Development Plan and SLO framework ensure that any future proposals will be subject to appropriate archaeological assessment, in line with national legislation and the principles of the Valletta Convention, thereby ensuring that any archaeological potential is identified, protected and appropriately managed as part of the planning process. In addition to the SLO, all development proposals will be subject to the requirements of the South Dublin County Development Plan 2022–2028, particularly Section 12.3.7 – Protected Structures, which provides a robust statutory framework for the protection of architectural heritage. This includes requirements for Conservation Reports, Architectural Heritage Impact Assessments (where necessary) and adherence to best practice conservation principles. Development in proximity to Protected Structures is not precluded, but must be demonstrably sensitive, subordinate and responsive to the character, setting and curtilage of the structures. All proposals will be assessed with direct input from the South Dublin County Council Conservation

this and further erosion of shame is considered to contributing to cumulative urbanisation pressure and erosion of landscape diversity. A poll was also recieved with regard to the site, with 0 in favour of rezoning and 10 against. <u>Landowner Submission</u> As outlined above, a submission from the landowner was received supporting the inclusion of the lands for rezoning for residential uses. **Aviation Safeguarding** Two submissions were received with regard to aviation safeguarding, a submission from the Dublin Airport Authority and a submission from TPA consultants on behalf of Weston Airport. The latter submission outlined the following: Weston Airport, represented by Tom Phillips + Associates, supports the overall intent of Proposed Variation No. 2, particularly South Dublin County Council's approach to aligning the Development Plan with the National Planning Framework (NPF) Housing Growth Requirements (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). The primary purpose of the submission is to safeguard the current and future operational, safety and technical requirements of Weston Airport, in	Architect and relevant specialist officers, ensuring that no adverse impacts arise. The proposed approach is also aligned with the National Planning Framework, including National Policy Objectives 89 and 90, which require the protection and enhancement of cultural and built heritage, and National Policy Objective 82, which promotes the integration of green and blue infrastructure with heritage and landscape. The delivery of the Liffey Valley park, the protection of the demesne landscape, and the integration of heritage features within a wider green infrastructure network support these objectives and reflect the principle that heritage assets are central to place-making, quality of life and long-term sustainability. In summary, while the concerns raised regarding potential impacts on heritage and archaeology are recognised, it is considered that the combination of the Specific Local Objective, the Development Plan policy framework and statutory assessment requirements provides a robust and enforceable mechanism to ensure that the cultural landscape, Protected Structures and archaeological potential of St. Edmundsbury are safeguarded and enhanced. The requirement for a masterplan-led, landscape-driven approach, combined with the early delivery of a Liffey Valley park, ensures that the historic setting and identity of the area will be maintained and strengthened, rather than diminished, as part of any future development. **Community and Social Facilities, and Schools** The concerns raised in submissions regarding school capacity and the provision of community and social infrastructure are acknowledged, particularly in the context of the cumulative population growth within

accordance with Section 11.8.3 of the South Dublin County Development Plan 2022–2028. The submission notes that a number of land parcels proposed for rezoning or identification as Strategic Reserve under the variation are located in close proximity to Weston Airport. The submission requests that any future planning applications on these lands be carefully assessed to ensure there are no adverse impacts on: the operational integrity of Weston Airport, aviation safety requirements, and associated specialist aviation activities, including the Irish Coast Guard Search and Rescue helicopter operations based at the airport. It is highlighted that Weston Airp ort, in consultation with the Irish Aviation Authority (IAA), is currently implementing RNAV (Area Navigation) approach procedures for Runway 07/25. These procedures will be used by the Coast Guard Search and Rescue service and are identified as particularly sensitive to inappropriate development that could interfere with flight paths, safety surfaces, or navigational requirements. Overall, while supporting the strategic aim of increased housing delivery, the submission emphasises the importance of ensuring that future development near Weston Airport is managed in a manner that avoids conflict with aviation operations,	the Lucan–Adamstown–Clonburris area and the associated demand placed on existing services. Submissions highlight capacity pressures at both primary and post-primary level, with particular reference to Lucan Community College and the wider school network, and emphasise that infrastructure delivery has not historically kept pace with population growth. Concerns are also raised regarding deficits in childcare, healthcare, youth facilities, recreation infrastructure and community services, with the long-term delay in delivery of facilities such as the Lucan swimming pool cited as evidence of this pattern. In addressing these issues, it is important to note that school provision is planned and delivered by the Department of Education and Youth (DOEY) in response to demographic demand. The submission from the DOEY acknowledges that projected population growth across Adamstown, Clonburris and surrounding lands, including St. Edmundsbury, may result in the need for additional primary and post-primary school provision over time, subject to population delivery, age profile and other influencing factors. The Department has indicated that it will continue to work with South Dublin County Council to assess and respond to these needs as they arise in accordance with Development Plan policy (notably Policy COS8). This coordinated approach allows for the timely planning and delivery of school infrastructure as demand materialises, consistent with national policy and practice. Further to this, and following further engagement with DOEY, the department have clarified that the existing school provision in the area will meet the demand arising from the proposed variation at St. Edmundsbury. It is also noted that significant educational provision has

through careful planning assessment and adherence to existing airport-related policy provisions in the Development Plan. The DAA also submitted a response to the consultation, this is summarised as follows: The submission specifically addresses two sites proposed for residential zoning under the variation, namely St. Edmundsbury (Amendment Ref. No. 6) and Foxhunter (Amendment Ref. No. 14). DAA highlight that both sites are located within Noise Zone D for Dublin Airport, as well as within the Noise Abatement Objective (NAO) contours identified by the Aircraft Noise Competent Authority (ANCA). DAA draw attention to the importance of land-use planning controls as a core element of the Balanced Approach under EU Regulation 598/2014, noting that policy objective DAO-11 of the Fingal Development Plan 2023 seeks to strictly control new residential development within airport noise zones and to require appropriate noise insulation where development is permitted. While daa have no objection in principle to residential development at these locations, subject to the achievement of acceptable residential amenity, they highlight the potential for future conflict with the Dublin Airport NAO. In particular, DAA note that the NAO is assessed on the basis of population exposure within the 45 dB	already been delivered and planned within the wider area. This includes: • the delivery and permitting of schools within Adamstown SDZ, many of which have exceeded standard capacity requirements; • the planned provision of additional schools within Clonburris SDZ; • ongoing monitoring of demand across the Lucan–Adamstown–Palmerstown catchment; and • The resulting capacity requirement from St. Edmundsbury can be captured within existing capacity in wider area. In parallel, substantial investment has been made in community and social infrastructure, including: • the Lucan Leisure Campus and swimming pool, • recent public realm improvements in Lucan Village, including the river-side plaza, • the continued development of Griffeen Park, extending towards Clonburris and the Grand Canal Greenway, and • the planning and delivery of community, recreational and childcare facilities through SDZ Planning Schemes. These projects reflect a sustained programme of Council-led investment aligned with population growth and demonstrate the Council's commitment to enhancing community, recreational and amenity infrastructure across the area. Future zoning, including the lands proposed at St. Edmundsbury, will further inform the Council's capital programme by identifying areas of projected population growth and emerging demand. This enables the prioritisation and sequencing of infrastructure investment, ensuring that future projects for parks, community facilities, transport and

Lden and 40 dB Lnight contours, and that these calculations are not adjusted to reflect the presence of noise insulation. As a result, any additional residents within these contours would increase the numbers of population classified as Highly Annoyed (HA) and Highly Sleep Disturbed (HSD), potentially impacting the achievement of the NAO and the operational resilience of Dublin Airport. The DAA request that this issue be explicitly addressed in the assessment of proposed Variation No. 2, given the central role of land-use planning in managing aircraft noise impacts. They also request that any rezoning within designated Airport Noise Zones include robust policy safeguards, specifically: mandatory noise insulation measures appropriate to the level of aviation noise exposure; and clear notification requirements to prospective purchasers and/or occupiers regarding the location of dwellings within an Airport Noise Zone and associated elevated levels of aircraft noise. **Environmental Evaluation** Submissions raise concerns in relation to both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), primarily focusing on the extent of identified environmental risks and the reliance on future mitigation measures to address them. It is also important to note that submissions such as the Inland Fisheries have been noted above and have been taken into account.	public realm improvements are aligned with planned development and delivered in a coordinated and timely manner. The South Dublin County Development Plan 2022–2028 provides a clear and structured framework for ensuring that infrastructure provision aligns with population growth. Chapter 8 (Community Infrastructure and Open Space) sets out defined standards for schools, childcare, healthcare, community centres and open space, informed by a Social / Community Infrastructure Audit (SIA). These standards are applied to all new development areas to ensure that future demand is identified and addressed in a systematic manner, including the application of population-based thresholds for educational and community facilities. SDCC will continue to promote, engage and facilitate the work of the HSE in the delivery of health services. In the case of St. Edmundsbury, the Specific Local Objective (SLO) ensures that development will be masterplan-led, phased and infrastructure-integrated. The SLO requires: • the preparation of a comprehensive masterplan, which must address the provision and integration of community and social infrastructure; and • the delivery of a Liffey Valley park in advance of, or in tandem with residential development, which will provide a significant amenity and recreational resource for both existing and future populations. Any future development proposals must also comply with Development Plan objectives relating to childcare provision, community uses, and social infrastructure, and will be subject to detailed assessment of cumulative impacts at planning application stage.

In respect of SEA, submissions reference the findings of the environmental assessments undertaken as part of the Variation, noting that potential conflicts with Strategic Environmental Objectives have been identified at St. Edmundsbury. Concerns are expressed that these findings indicate underlying environmental sensitivities, and that the reliance on further assessment and mitigation at downstream stages may not provide sufficient certainty to justify rezoning at this time. Submissions also highlight the importance of considering cumulative environmental impacts, particularly in the context of ongoing development across the Lucan–Adamstown area, and question whether these impacts can be adequately managed through mitigation alone. In relation to AA, while not always explicitly referenced, submissions raise concerns regarding potential pathways for impact on European sites, particularly through hydrological connectivity between the River Liffey and downstream Natura 2000 sites. Concerns also relate to the presence of protected species and sensitive habitats, with submissions advocating a precautionary approach to ensure that potential impacts on ecological integrity are fully understood and addressed prior to rezoning. Overall, submissions frame SEA and AA as critical safeguards in the planning process and question whether the identified environmental sensitivities,	This approach aligns with Regional Policy Objective 9.14 of the RSES, which seeks to ensure that all communities have access to appropriate social, community and educational facilities, and with the South Dublin County Local Economic and Community Plan, which promotes coordinated delivery of services to support sustainable communities. In summary, while the concerns raised in relation to school capacity and community infrastructure are acknowledged, it is considered that: • ongoing engagement with the Department of Education and Youth provides a clear mechanism for the planning and delivery of school provision in line with population growth and ensure capacity is adequate in nearby/surrounding areas; • significant existing and planned infrastructure within the wider area contributes to meeting current and future needs; • the Development Plan establishes robust standards and requirements for infrastructure provision; and • the Specific Local Objective ensures that development at St. Edmundsbury will be appropriately phased and delivered in tandem with infrastructure through a plan-led masterplanning process. Accordingly, it is considered that the combined effect of these mechanisms provides a coherent and coordinated framework for addressing education and community infrastructure needs, ensuring that services are delivered in a manner consistent with sustainable growth and quality of life objectives. **Density and Housing** The issues raised in submissions regarding density and housing are acknowledged, particularly the concerns relating to cumulative growth in the Lucan–Adamstown area, the completion of existing Strategic

cumulative impacts, and reliance on future mitigation measures provide a sufficient basis to support the proposed zoning at St. Edmundsbury without further detailed assessment at this stage.	Development Zones (SDZs), and the sequencing of development relative to infrastructure delivery. It is noted that many submissions frame density and housing issues in cumulative terms, highlighting the significant levels of development already delivered or permitted within Adamstown SDZ and Clonburris SDZ, and expressing concern that additional lands at St. Edmundsbury would further intensify development pressures. Submissions also emphasise that objections are not to housing delivery in principle, but to the location, timing and sequencing of additional residential development. However, it is important to clarify that the identification and assessment of sites under Proposed Variation No. 2 has been undertaken in accordance with the Section 28 Ministerial Guidelines on Housing Growth Requirements (2025) and the Section 28 Sustainable Residential Development and Compact Settlements Guidelines, which give statutory effect to the National Planning Framework (NPF). In this context, the Council undertook a capacity audit and site-selection process, applying the criteria set out in the Guidelines, including: • accessibility to services, employment and transport; • availability and capacity of physical, social and community infrastructure; • environmental capacity and constraints; and • the potential to support compact and sequential development. With regard to density, it is emphasised that density levels are not fixed at zoning stage. Instead, density will be applied at development stage in accordance with:

	Section 28 Guidelines for Compact Growth, which set out appropriate density ranges relative to location; the South Dublin County Development Plan 2022–2028; and any updated national policy or guidance in force at the time of application. This ensures that densities will be context-responsive, taking account of the site's location, accessibility, environmental sensitivity and relationship with adjoining areas. The application of density will therefore be aligned with the principles of Transit Oriented Development and compact settlement, where appropriate, while ensuring that the receiving environment is not adversely affected. Importantly, the Specific Local Objective (SLO) for St. Edmundsbury establishes a clear requirement that development must be masterplan-led and infrastructure-integrated. This includes: • the delivery of a Liffey Valley park in advance of, or in tandem with, residential development; • the preparation of a comprehensive masterplan addressing environmental, landscape, heritage and transport considerations; and • the requirement that development responds to the sensitivity of the site, including Protected Structures and the wider landscape setting. These provisions ensure that density and overall development form are subordinated to environmental, heritage and infrastructural considerations, and are not permitted to exceed the capacity of the site. In terms of housing type, tenure, building height and layout, it is noted that these matters are appropriately addressed at planning application

	stage, where detailed proposals are assessed against national and local policy. Any future development proposal will be required to: • demonstrate high-quality urban design and residential amenity; • address impacts such as overshadowing, overlooking, daylight, privacy and integration with adjoining areas; and • comply with relevant height, design and layout guidance, including Development Plan standards. Proposals which fail to meet these requirements will not be supported. With regard to social and affordable housing, provision will be secured in accordance with statutory requirements under the Planning and Development Act 2000 (as amended) and any subsequent legislation. Compliance with Part V obligations and any updated delivery mechanisms will form a standard requirement of any future planning permission. In summary, while concerns regarding cumulative density and housing provision are acknowledged, it is considered that: • the inclusion of St. Edmundsbury arises from a statutory, policy-led process to meet NPF housing targets; • density will be applied in accordance with national Guidelines and Development Plan policies, ensuring that it is appropriate to the site and its context; and • the Specific Local Objective and masterplan requirement provide a robust framework to ensure that development is delivered in a co-ordinated and environmentally responsive manner. Accordingly, it is considered that the proposed approach ensures that housing delivery at St. Edmundsbury can be achieved in a controlled,

	sustainable and high-quality manner, consistent with national policy and the objectives of the Development Plan. **Flooding and Riparian Corridor (inclusive of SFRA commentary)** The concerns raised in submissions regarding the riparian function of the Liffey corridor, flood risk, and surface water management are acknowledged, particularly in the context of the site's proximity to the River Liffey, its role within the wider Liffey Valley landscape, and the cumulative impacts of development across the Lucan–Adamstown area. Submissions emphasise that St. Edmundsbury forms part of a broader riparian and flood management system, contributing to ecological connectivity, flood storage and downstream water regulation. Concerns are expressed that development could reduce this capacity, leading to increased flood risk locally and downstream, particularly in Lucan Village, Palmerstown and the wider Liffey corridor. Issues relating to surface water runoff, the loss of permeable land, and the impact of climate-driven rainfall events are also raised, with submissions highlighting the importance of retaining such lands in their current state. However, it is important to emphasise that the proposed zoning has been informed by the Strategic Flood Risk Assessment (SFRA) undertaken in support of the Variation. The SFRA concludes that the lands: • are not located within Flood Zones A or B, • are outside predicted flood extents for significant flood events, and • therefore do not require a Justification Test under the Flood Risk Management Guidelines.

	On this basis, the SFRA confirms that the proposed zoning is appropriate from a strategic flood risk perspective, subject to the application of site-specific assessment and mitigation measures at development stage. Further to this, additional reviews of the subject site were undertaken following the receipt of submission. The following was considered in response to issues arising: *The SFRA confirms Site 128 (St Edmundsbury) is not situated within Flood Zone A or B, nor within the HEFS 0.1% or 1% AEP zones. There are no known watercourses within the site. The River Liffey runs approximately 250m to the north. No Justification Test is required and the variation to residential zoning is considered appropriate from a flood risk perspective.* *The broader floodplain storage concerns raised are acknowledged. The SFRA flood zone mapping, based on Eastern CFRAM outputs, delineates the active Flood Zone A and B extents for the Liffey in this area. Lands within those zones are protected by the Sequential Approach in the Guidelines, which precludes highly vulnerable uses including residential development. The CDP Riparian Corridor designation is consistent with the SFRA flood zone mapping in this area.* *Geotechnical and slope stability assessment is outside the scope of the SFRA. However, a site-specific FRA for any development at [the] site should assess surface water runoff pathways and the potential for development to alter drainage patterns in the vicinity of the valley slopes, consistent with the protective intent of the Liffey Valley Special Amenity Area Order. Flood risk for any new development must be assessed in accordance with Section 4.3 of the SFRA.*

	Notwithstanding this, the Specific Local Objective (SLO) provides a robust and precautionary framework to address the concerns raised. The SLO requires the delivery of a substantial Liffey Valley park on lands zoned HA-LV, extending to the River Liffey and to be provided in advance of, or in tandem with, any residential development. This requirement ensures that: • lands closest to the Liffey corridor, and those most relevant to riparian function and flood attenuation, are retained as open, permeable and managed landscape; • the integrity of the Liffey Valley as a green and blue infrastructure corridor is protected and enhanced; and • opportunities for nature-based flood management and ecological connectivity are fully realised. The SLO further requires that development is brought forward on the basis of a comprehensive masterplan, supported by environmental and technical assessments. These will include detailed consideration of: • surface water management and drainage design, • integration of green and blue infrastructure, and • appropriate layout and sequencing of development, having regard to the receiving environment. In this regard, all future development will be required to comply with the South Dublin County Council Sustainable Drainage Systems (SuDS) Guidelines, ensuring that: • surface water runoff is controlled to greenfield rates, • permeable surfaces and attenuation features are maximised, and • there is no increase in flood risk elsewhere, including downstream areas.

	The use of SuDS and nature-based solutions is consistent with National Planning Framework policy, including National Policy Objective 78, which requires that flood risk management informs place-making and that development avoids increasing flood risk in other locations, and broader policy objectives promoting sustainable water management and climate adaptation. In addition, development proposals will be required to comply with Development Plan objectives relating to riparian corridors, ensuring the protection, buffering and enhancement of watercourses and associated habitats where relevant, and their integration into the wider Green Infrastructure network. It is also noted that concerns raised in submissions relating to the displacement of floodwaters and cumulative impacts are appropriately addressed at the planning application stage, where detailed hydrological and drainage assessments will be required to demonstrate that proposed development: • does not increase flood risk either on site or elsewhere, • incorporates adequate mitigation measures, and • aligns with best practice in flood risk management and climate resilience. In summary, while the concerns raised in relation to riparian function, surface water management and flooding are acknowledged, it is considered that: • the SFRA confirms the suitability of the lands for development at a strategic level; • the Specific Local Objective ensures the protection and enhancement of the Liffey Valley corridor through the delivery of a substantial park;

	• the application of SuDS, Development Plan policies and national guidance ensures robust and sustainable water management; and • detailed assessment at planning application stage will address site-specific risks and cumulative impacts. Accordingly, it is considered that the proposed framework provides a comprehensive, precautionary and policy-aligned approach which safeguards the riparian, ecological and hydrological functions of the Liffey Valley, while ensuring that any future development at St. Edmundsbury is appropriately managed in accordance with best practice flood risk and water management principles. **Tourism, Retail and Employment** The issues raised in submissions in relation to tourism, retail vitality and employment are acknowledged, particularly in the context of the wider Lucan–Liffey Valley area, the functioning of Lucan Village, and the cumulative impacts of development on accessibility, amenity and economic activity. It is recognised that submissions associate existing congestion and transport pressures with a perceived decline in the attractiveness and functionality of Lucan Village as a local retail and service centre. Concerns are also raised that further population growth without appropriate infrastructure investment could exacerbate accessibility constraints and undermine the vitality of the village core. In addition, submissions highlight that employment generation has not kept pace with residential growth, resulting in increased outbound commuting along key routes such as the N4 and M50, reinforcing car dependency and contributing to congestion. The importance of the Liffey Valley as a recreational, heritage and tourism asset is also emphasised, with

	concern that its character and amenity value could be diminished through inappropriate development. The Planning Authority considers that the proposed approach for St. Edmundsbury, when read in conjunction with the Specific Local Objective (SLO), provides a framework which has the capacity to address these concerns in a coordinated and plan-led manner. Central to the SLO is the requirement for the delivery of a substantial public park within the Liffey Valley (HA-LV lands) extending to the River Liffey and incorporating connections to Lucan Village and Chapel Hill, to be provided in advance of or in tandem with residential development. This represents a significant strategic intervention which will: • transform lands currently in private ownership and informal use into a managed, accessible public amenity; • enhance the recreational and tourism function of the Liffey Valley SAAO, supporting walking, leisure and heritage appreciation; • strengthen the environmental and visual quality of the area, thereby contributing to its attractiveness for residents, visitors and investment; and • reinforce the role of the valley as a defining natural and cultural landscape asset. This approach is consistent with the National Planning Framework, which recognises that high-quality amenity, heritage and environmental assets underpin tourism, place-making and economic attractiveness, and that well-designed public spaces and parks contribute significantly to quality of life and long-term sustainable development.

	The SLO further requires a comprehensive masterplan, informed by landscape, heritage, ecological and transport assessments, ensuring that any development is sensitive to the historic character of the Liffey Valley and Lucan Village. The protection and integration of Protected Structures and their curtilage will ensure that the cultural heritage assets which contribute to the identity and tourism value of the area are safeguarded and enhanced as part of any future development. In terms of access and retail function, the requirement for a Transport and Traffic Assessment as part of the masterplan ensures that the cumulative impact of development on the local and strategic road network, including Lucan Village, is fully assessed and mitigated. The provision of improved pedestrian and green connections between the site and Lucan Village will enhance permeability and accessibility, supporting footfall and reinforcing the relationship between the village, the river corridor and surrounding residential areas. With regard to employment, while submissions highlight an existing reliance on outbound commuting, the masterplan-led approach provides an opportunity to consider the integration of appropriate local services, community uses, and small-scale commercial or mixed-use elements, in line with County Development Plan policies. This has the potential to contribute to local employment generation and reduce the need for longer-distance travel, subject to detailed assessment at planning application stage. In summary, while the concerns raised in relation to tourism, retail and employment are acknowledged, it is considered that the Specific Local Objective establishes a robust framework through which: • the Liffey Valley's recreational and tourism potential will be enhanced through the delivery of a new public park;

	• the heritage and landscape character of Lucan and the river valley will be protected and strengthened; • connectivity to Lucan Village will be improved, supporting its ongoing role as a local centre; and • future development will be comprehensively planned, assessed and integrated in accordance with Development Plan policy. Accordingly, it is considered that, when implemented in accordance with the SLO and subject to the masterplanning process, the development of St. Edmundsbury has the capacity to contribute positively to the amenity, tourism, economic and spatial cohesion of the wider Lucan–Liffey Valley area, rather than detracting from it. **Utilities, Water and Wastewater** The concerns raised in submissions regarding the capacity of utilities infrastructure, including water supply, wastewater networks, drainage and electricity provision, are acknowledged, particularly in the context of the cumulative scale of development across the Lucan–Adamstown–Clonburris area and the perception that infrastructure delivery has not always kept pace with population growth. <u>Water and Wastewater Capacity</u> The Planning Authority has engaged with Uisce Éireann (Irish Water) in relation to the proposed rezoning. Uisce Éireann have confirmed that, in relation to St. Edmundsbury: • Local upgrades to both water and wastewater networks are likely to be required, depending on the density proposed and the point of connection; • Where no strategic upgrade is programmed, such works can be developer-led, subject to agreement with Uisce Éireann; and

	• These requirements will be determined at planning application stage, based on detailed proposals. In addition, Uisce Éireann note that: • the Ringsend Wastewater Treatment Plant upgrade has recently been completed, and is considered adequate to serve development during the lifetime of the current Development Plan; and • the long-term provision of wastewater capacity for the Greater Dublin Area will be supported by the Greater Dublin Drainage (GDD) Project, which is required to facilitate medium- to long-term growth. These responses indicate that while local and site-specific upgrades may be necessary, there are no insurmountable strategic capacity constraints identified at this stage, and that infrastructure provision can be aligned with development through established delivery mechanisms via the SLO and infrastructure masterplan as requested by UE. <u>Surface Water, Groundwater and Construction Impacts</u> The issues raised in submissions relating to surface water runoff, groundwater protection and construction impacts are noted. These matters fall within the remit of the Planning Authority and will be addressed through: • the application of the South Dublin County Council Sustainable Drainage Systems (SuDS) Guidelines; • detailed site-specific drainage design and hydrological assessment; and • standard requirements for Construction Environmental Management Plans (CEMP) at planning application stage.

	This ensures that development will be required to demonstrate that surface water is appropriately managed, runoff is controlled, and no adverse impacts on groundwater or receiving waters arise. In addition to the statutory utility provider requirements, the Specific Local Objective (SLO) for St. Edmundsbury provides a critical framework to ensure that development is plan-led and infrastructure-coordinated. The SLO requires: • the preparation of a comprehensive masterplan, to be agreed with the Planning Authority in advance of any development; and • the delivery of key infrastructure, including a Liffey Valley park, in tandem with or prior to residential development. Through this process, the capacity and delivery of utilities infrastructure will be assessed on a holistic, site-wide basis, ensuring that development is not advanced in a piecemeal manner and that infrastructure provision is aligned with the phasing and scale of development. The masterplanning process will also involve ongoing engagement with Uisce Éireann, ensuring that water and wastewater requirements are fully integrated into the development framework at an early stage. <u>Electricity Infrastructure and Wider Utilities</u> In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place.

	A submission was received from the Electricity Supply Board (ESB) with regard the overall variation, having no site specific objections to the proposed variation. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals This ensures that electricity provision, like water services, is matched to development proposals and delivered in a coordinated manner. <u>Conclusion</u> In summary, while the concerns raised regarding utilities capacity and the ability of infrastructure to keep pace with growth are acknowledged, it is considered that: • the Planning Authority is actively engaging with Uisce Éireann, EirGrid and ESB Networks to support infrastructure planning and delivery; • Uisce Éireann have confirmed that development at St. Edmundsbury can be accommodated, subject to local upgrades where required, which may be developer-led and appropriately phased; • strategic capacity, including at Ringsend WWTW, is currently in place, with longer-term capacity addressed through the GDD project; and • the Specific Local Objective and masterplan requirement ensure that development will be coordinated with infrastructure provision, addressing capacity, sequencing and cumulative impacts at the appropriate stage.

	Accordingly, it is considered that the combination of provider engagement, statutory requirements, and the SLO-led masterplanning framework provides a robust and structured approach to managing utilities and water services, ensuring that development at St. Edmundsbury will proceed only where it can be supported by appropriate, phased and deliverable infrastructure. **Climate Action** The concerns raised in submissions regarding climate action are acknowledged, particularly those relating to increased car dependency, the loss of greenfield lands and natural carbon sinks, and the potential reduction in flood resilience and environmental capacity within the Lucan–Liffey Valley area. Submissions emphasise the role of the existing lands at St. Edmundsbury in providing important ecosystem services, including carbon sequestration through mature vegetation, the attenuation of surface water through permeable soils, and local cooling effects that contribute to climate resilience. These concerns are also framed in a cumulative context, with reference to recent flood events within the Liffey catchment and the incremental loss of green infrastructure across the wider Lucan–Adamstown area. It is considered, however, that the proposed zoning must be read in conjunction with the Specific Local Objective (SLO), which establishes a clear and enforceable framework to ensure that climate action is embedded in the development of the site. The requirement for the delivery of a substantial Liffey Valley park on lands zoned HA-LV, in advance of or in tandem with any residential development, ensures that significant areas of permeable land and green infrastructure are retained and enhanced. This will safeguard the role of the site in carbon capture, biodiversity support, flood attenuation and microclimate regulation, while also facilitating the integration of nature-based

	solutions into the overall site design. The SLO further requires that development be guided by a comprehensive masterplan, supported by ecological, landscape and environmental assessments, thereby ensuring that natural features such as trees, hedgerows and existing landscape structure are incorporated into the development in a manner that supports long-term environmental resilience. The proposed approach is aligned with the National Planning Framework, which places strong emphasis on the integration of climate action into land use planning. National Strategic Outcome 8 promotes the transition to a carbon-neutral, climate-resilient society, while National Policy Objective 69 requires the integration of climate mitigation and adaptation into the planning system. National Policy Objective 78 further requires that flood risk is addressed as a core element of place-making, and National Policy Objective 43 supports the delivery of housing in locations that facilitate sustainable development patterns. In this context, the retention and enhancement of green and blue infrastructure, including the Liffey Valley corridor, is recognised as a critical component of climate adaptation, supporting flood management, biodiversity and environmental quality. The South Dublin County Development Plan reinforces these national objectives by embedding climate action across all policy areas, ensuring that all development proposals are assessed in terms of their contribution to climate mitigation and adaptation. This includes the application of Sustainable Drainage Systems, low-carbon design principles, and the integration of green infrastructure throughout development sites. The South Dublin Climate Action Plan further supports the use of nature-based solutions, the protection of environmental assets and the promotion of sustainable travel patterns as key measures in reducing emissions and enhancing resilience.

	Concerns regarding car dependency are also acknowledged; however, the Planning Authority notes that the development of St. Edmundsbury is intended to form part of a compact growth and transit-oriented approach. The site will be integrated with existing and planned public transport infrastructure, including BusConnects, DART+ South West and the future Luas Lucan, as well as active travel networks linked to the Liffey Valley and wider greenway system. The application of Design Manual for Urban Roads and Streets principles will ensure that the development prioritises walking and cycling and reduces reliance on the private car over time. In relation to flooding and surface water, the concerns raised are addressed through the Strategic Flood Risk Assessment, which confirms that the site is located outside Flood Zones A and B, and through the requirement to apply Sustainable Drainage Systems and other nature-based solutions as part of any future development. The retention of significant open space through the Liffey Valley park, combined with site-specific drainage design, will contribute to maintaining and enhancing flood resilience and water management capacity. Overall, while the concerns regarding climate impacts are recognised, it is considered that the combination of the Specific Local Objective, the Development Plan and national policy provide a robust and climate-responsive framework for the development of St. Edmundsbury. The emphasis on green and blue infrastructure, masterplan-led development, sustainable mobility and environmental integration ensures that the site can contribute positively to climate mitigation and adaptation objectives, supporting the transition to a low-carbon, resilient and sustainable settlement pattern.

	Aviation Safeguarding The submission made on behalf of Weston Airport has been carefully considered, with particular regard to the safeguarding of aviation operations, public safety, and the operational and technical requirements of civil aerodromes within and adjoining South Dublin County. The Council acknowledges and supports the importance of aviation safeguarding as set out within Chapter 11.8 of the South Dublin County Development Plan 2022–2028, which provides a comprehensive framework for development controls in the vicinity of Dublin Airport, Casement Aerodrome and Weston Airport, having regard to international, European and national aviation standards. These include the safeguarding requirements established under ICAO Annex 14, the Irish Aviation Authority (IAA) Guidance on Aerodrome Safeguarding, and the EASA Certification Specifications for Aerodromes. With specific regard to Weston Airport, the Council recognises its role as a general aviation facility of regional and national importance, including its function as the base for the National Flight Centre pilot academy and its critical role in Search and Rescue Helicopter operations for the Irish Coast Guard. The submission's reference to the implementation of RNAV (Area Navigation) approach procedures for Runway 07/25, being developed in consultation with the IAA. The Council confirms its continued commitment to Policy IE10 (Weston Airport) and associated objectives within the Development Plan, which require that development in the environs of Weston Airport: • safeguards current and future operational, safety and technical requirements; • prevents encroachment of development which could interfere with safe aircraft operations;

	• maintains obstacle limitation surfaces free of obstruction; and • restricts development where it would constitute a safety hazard. It is also noted that obstacle limitation surfaces for Weston Airport overlap with those of Casement Aerodrome, and that, in accordance with the Development Plan. In addition, the Council reaffirms the application of Public Safety Zones (PSZs) under Policy IE14, including Inner and Outer PSZs, which restrict or prohibit development involving human occupancy in proximity to runway thresholds. These zones are specifically intended to protect public safety on the ground and will continue to apply to any future planning applications within the defined areas. With regard to Dublin Airport, the Council notes that while South Dublin County lies approximately 10 km from the airport boundary and therefore experiences limited direct noise and safety impacts, the importance of Dublin Airport to the national economy and tourism is fully recognised. The relevant provisions of Policy IE11 (Dublin Airport), including limits on building height within the Outer Horizontal Surface and consultation with DAA and the IAA, will continue to be rigorously applied. Similarly, Policy IE13 (Noise) will guide the assessment of any noise-sensitive development within noise-affected areas, including requirements for appropriate noise assessment and mitigation. The Council also notes the request from both DAA plc (in relation to Dublin Airport Noise Zones) and Weston Airport that future residential development within airport-influenced zones be carefully managed to avoid adverse consequences for both aviation operations and residential amenity. In this regard, the Council considers that there is merit in reinforcing aviation safeguarding and noise-related considerations through either:

	• the refinement of Specific Local Objectives (SLOs) associated with relevant variation sites; and/or • the application of clear GIS-based safeguarding and noise mapping layers, to be read in conjunction with Development Plan maps and applied consistently in the assessment of planning applications within, or in close proximity to, airport safeguarding zones. Such an approach would enhance clarity for applicants and the public, ensure early identification of aviation constraints, and reinforce the requirement for appropriate design responses, including noise mitigation and disclosure to prospective occupiers, where residential or other sensitive uses are proposed. In summary, the Council strongly supports the continued safeguarding of Weston Airport and Dublin Airport, as set out in the Development Plan. It is satisfied that the existing policy framework under Chapter 11.8 and Chapter 12 (Implementation and Monitoring) provides a robust and enforceable basis for managing development in proximity to aerodromes. Any future development proposals arising from Proposed Variation No. 2 will be assessed in full compliance with these policies, in consultation with the IAA, airport operators and other prescribed bodies, ensuring the protection of aviation safety, operational resilience, and residential amenity in the context of proper planning and sustainable development. **Miscellaneous** <u>Personal Attachment /Memory</u> A number of submissions highlighted a strong personal and sentimental attachment to the lands at St. Edmundsbury, referencing long-standing use of the area and its importance for recreation and wellbeing, past

	agricultural uses, and use particularly during the Covid period. While the Council acknowledges and appreciates these connections, it is inherently difficult to objectively assess or quantify personal attachment within the formal planning process. The evaluation of these lands has therefore been undertaken based on established planning criteria and the technical requirements set out in the Section 28 Guidelines for Compact Growth issued by the Department of Housing, Local Government and Heritage. Notwithstanding this, the proposed inclusion of a park within the development will ensure continued public access and recreational use of the area. Furthermore, any protected structures on the site will be appropriately safeguarded, helping to retain the character and sense of place associated with these lands. The outcome of the poll are noted (0 Yes, 10 No). <u>Landowner Submission</u> The general support outlined in the submission form the O'Flynn group is noted and has been considered as part of the overall review of the submissions received in totality for St. Edmundsbury. **Environmental Evaluation** The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality.

	The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Tubber Lane North. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. The issues raised by the submissions as they related to the SEA were further reviewed by the consultants who undertook the assessments to ensure a robust analysis of the site pending consideration of same as part of the variation process: Amendment to CS7 SL02: • *The inclusion of an Ecological buffer to form part of the eastern and northern boundary of the lands and to include retention of the mature woodland in the south east of the lands. The buffer to comprise minimum of 50m from boundary, following contours and be informed by ecological surveys - The objective of the buffer will be to provide an ecological and visual buffer between future residential development and lands of the Liffey Valley to the east and north. Design and planting regime to be agreed with SDCC in advance and provide for thorny and native shrub species that support foraging and commuting habitat for species whilst deterring human and domestic animal ingress.* • *Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.*

	• *Amend point (c) to include for landscape and visual impact assessment including on views to be agreed in advance with SDCC* Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. It is important to note that there are a number of related projects, such as, BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. In summary, the Planning Authority is satisfied that the proposed variation, including the zoning of St. Edmundsbury, has been subject to robust Strategic Environmental Assessment and Appropriate Assessment, which have fully considered cumulative environmental effects. The outcomes of these assessments have directly informed the

	drafting and strengthening of the SLO, as well as the proposed amending of the site size following the outcome of consultation responses and SEA evaluation, therefore ensuring that potential environmental impacts are avoided, minimised and mitigated in line with best practice and legislative requirements. **CE Recommendation** Amend wording of the SLO no. CS7 SLO2 to reflect requirement to ensure alignment with DART+ South West or any other future iteration of same in response to the comments made from the NTA: • c. A Local landscape and historical character assessment, which shall **include a landscape and visual impact assessment taking account of views to be agreed in advance with the Planning Authority** • **f. The inclusion of an Ecological buffer to form part of the eastern and northern boundary of the lands and to include retention of the mature woodland in the south east of the lands. The buffer to comprise minimum of 50m from boundary, following contours and be informed by ecological surveys - The objective of the buffer will be to provide an ecological and visual buffer between future residential development and lands of the Liffey Valley to the east and north. Design and planting regime to be agreed with SDCC in advance and provide for thorny and native shrub species that support foraging and commuting habitat for species whilst deterring human and domestic animal ingress. See amended map.** • **g. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.**

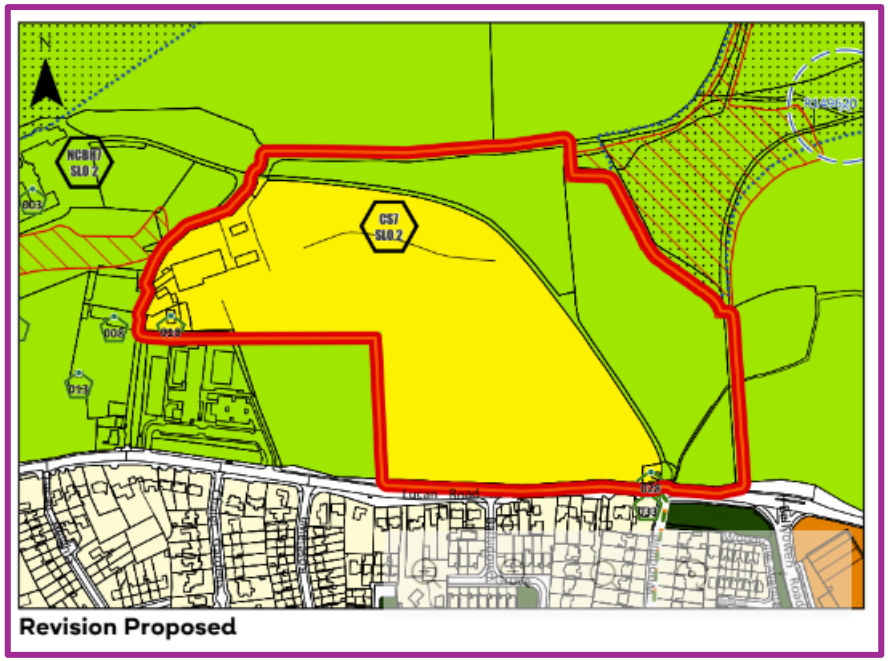
	Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process.' Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The subject lands at St Edmundsbury are appropriate lands to meet these objectives. The Planning Authority also emphasises that the revised zoning extent represents a relatively small proportion of the overall Liffey Valley and has been carefully defined having regard to the sensitivity of the wider landscape. The extent and location of the revised RES-N lands are set

	back from the Special Amenity Area Order, are adjacent to the existing public road network and existing buildings, and are topographically removed from the River Liffey corridor, thereby limiting direct visual, ecological and hydrological impacts. The retention and delivery of a substantial Liffey Valley park will provide an opportunity to enhance the visual and biodiversity value of the existing tillage fields, while securing long-term public access and green infrastructure connectivity. The revised zoning boundary, defined by the existing avenue, provides a clear and appropriate transition between development lands and the wider valley landscape. In combination, the reduction in zoning extent and the strengthening of the Specific Local Objective represent a direct and proportionate response to the issues raised in submissions, ensuring that development is appropriately scaled, sensitively located, and aligned with the protection and enhancement of the Liffey Valley. The Planning Authority considers that the proposed revised zoning and associated SLO provide an appropriate, proportionate and policy-aligned framework for the development of these lands, reflecting their scale, location and relationship to Lucan Village. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

CE Recommendation

Amend the Zoning Boundary Extent

Revise the redline boundary of the proposed variation site to the Avenue/access road, as per updated map.



Proposed Revised Area of Res-N 9.67 Ha
Proposed Revised Area of HA-LV 5.31 Ha

Amendment to SLO to include:

CS7 SLO2: Development on RES-N zoned lands at St. Edmundsbury, Lucan Road shall comply with the following:

1.The development of a park within the Liffey Valley (zoning objective HA-LV) with enhanced recreational amenity and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network shall be

provided for in tandem with, or prior to, residential development of the adjoining Res-N zoned lands. The park shall include lands within the HA-LV zoning objective to the north and west of the Res-N zoned lands extending to the River Liffey, including to the north and west of St. Patrick's Hospital grounds and including connections westwards to Lucan Village and Chapel Hill. A detailed proposal to achieve this shall be agreed with the planning authority in advance of submission of a planning application for residential development on the Res-N zoned lands.

2.A masterplan for the lands shall be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia:
a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species,
b. Retention and enhancement of the east-west hedgerow and tree line in the north of the site as recorded on 1st Edition OS maps,
c. A Local landscape and historical character assessment, which shall **include a landscape and visual impact assessment taking account of views to be agreed in advance with the Planning Authority**
d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, ~~and~~
e. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structures and their curtilage
f. The inclusion of an Ecological buffer to form part of the eastern and northern boundary of the lands and to include retention of the mature woodland in the southeast of the lands. The buffer to comprise minimum of 50m from boundary, following contours and be informed by ecological surveys - The objective of the buffer will be to provide an ecological and visual buffer between future residential development and lands of the Liffey Valley to the east and north. Design and planting regime to be agreed with SDCC in advance and provide for thorny and native shrub species that support foraging and commuting habitat for species whilst deterring human and domestic animal ingress. See amended map below.
g. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance.

AMENDMENT NO. 7 - EDMONDSTOWN ROAD

Existing

Proposed

Submission No.

SD-C401-CDP25-574 – Edmondstown Golf Club

SD-C401-CDP25-793 – Adam Monks

SD-C401-CDP25-794 – Adam Monks

SD-C401-CDP25-796 – Gilda Sisk

SD-C401-CDP25-799 – Louise Monks

SD-C401-CDP25-801 – DAVID HANRAHAN

SD-C401-CDP25-813 – Joohi Kamath

SD-C401-CDP25-816 – Paul Richards

SD-C401-CDP25-820 – Richard Moriarty

SD-C401-CDP25-821 – Claire Garvey

SD-C401-CDP25-871 – Laura Lawlor

SD-C401-CDP25-874 – EUGENE BARRETT

SD-C401-CDP25-875 – JOHN BURKE

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-923 – Eugenia Guspi

SD-C401-CDP25-955 – Mariana Calderon	SD-C401-CDP25-1321 – Anna Leonard	SD-C401-CDP25-1369 – Barry Murphy
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1398 – Patrick Leonard	SD-C401-CDP25-1443 – Electricity Supply Board
SD-C401-CDP25-1485 – Jeremy Leonard	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1653 – John Leonard
SD-C401-CDP25-1664 – Knocklyon Network	SD-C401-CDP25-1670 – Sophia Leonard	SD-C401-CDP25-1676 – South Dublin Conservation Society
SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG		

Summary	CE Response
Submissions were received from individuals, including local residents, groups and organisations such as Ballyboden Tidy Towns, Knocklyon Network and Edmondstown Golf Club. The majority of the submissions oppose Amendment No. 7 for reasons including loss of agricultural lands and a local farm of educational and heritage value, overdevelopment of the area, public transport services, traffic congestion and lack of community and social infrastructure to support additional housing. **Zoning** Submissions request that the 'RU' lands remain in their existing zoning categories, or be redesignated for	**Overview** Amendment No. 7 proposes to rezone lands adjoining Edmondstown Road, that are currently zoned Objective RU to RES under Variation No. 2 of the South Dublin County Development Plan 2022-2028. The subject lands are located on the eastern side of Edmondstown Road. Incorporated into Amendment No. 7 is Specific Local Objective CS7 SLO6: *Development on RES zoned lands on Edmondstown Road shall comply with the following:* *a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority.*

amenity or open space use, rather than being rezoned for development. It is asserted that the Council should focus on integrating and servicing existing approved developments and preserve remaining open lands that contribute to community amenity and environmental quality. Submissions highlight that rezoning additional greenfield land at this stage risks over-concentrating development in an area already undergoing rapid change, while simultaneously reducing the environmental assets that support the quality of life for existing and future residents. Many of the uses (under 'RES') it is submitted would be incompatible with the surrounding residential and recreational character of the area, potentially introducing additional traffic, noise and infrastructure demand. It is requested that the current balance of low-density residential development supported by recreational open space be preserved. Submissions object to the proposed re-zoning at Edmondstown Road on the basis that significant development is already approved in the area, there is lack of transport infrastructure, there is existing congestion in the area, the site's importance as a buffer	*b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage.* *c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping.* Also relevant to this proposed rezoning are Amendments No. 22, to upgrade Edmondstown Road, the main access road serving the subject lands, and Amendment No. 23, for new road infrastructure to the south and southeast of the subject lands on existing zoned residential lands. Amendment No. 22 is for a new 6 Year Road Objective to upgrade Edmondstown Road to enhance pedestrian, cycling and public transport facilities and access to new residential lands. Amendment No. 23 is also for a 6 Year Road Objective for a new link road between Whitechurch Road to the east and Edmondstown Road to the west that would traverse the existing 'RES' zoned lands to the south, that have been zoned for residential development for approximately 18 years, since the adoption of the 1998-2004 South Dublin County Development Plan. It is noted that reference is made to Amendments No. 12 and No. 21 in respect to this Amendment. However, they will be dealt with separately in this report except insofar as they may relate to matters addressed here. **Variation Context and Process**

for the Dublin Mountains, its biodiversity and Green Infrastructure value and the unsuitability of proposed uses. Submission highlights the importance of the agricultural lands at Edmondstown Road as a valuable educational resource for local schools and the wider community. The farm provides a unique local heritage and educational asset to the area and represents one of the last remaining agricultural areas of its kind in close proximity to Dublin. It is submitted that a Variation should maintain the overall coherence and internal consistency of the County Development Plan and as a whole the amendments create a number of strategic inconsistencies within the Plan. **Overdevelopment** It is asserted that significant development has already been granted in the area, including an area identified in submissions as the Knocklyon / Ballyboden corridor, in recent times with development on a number of sites underway or approved on nearby lands, such as the Augustinian lands and other residential sites in the area. It is submitted that these developments will introduce hundreds of additional households into the local transport and service network in the coming years. Submissions highlight the cumulative impact of these (permitted) developments should be fully absorbed	For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines. required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of ‘additional provision’ of up to 50% to meet the baseline targets,

before additional land is rezoned for housing. Rezoning further greenfield land risks creating development pressure that exceeds the capacity of existing infrastructure and road networks, it is asserted. It is suggested that planning decisions take a phased and balanced approach, ensuring that existing approved developments are integrated before further expansion is considered. It is submitted that the proposed rezoning would create a false impression of available housing land, despite SDCC already having approximately 570 Ha of residential zoned land. Edmondstown Park is referred to in submissions as a poorly serviced, rural-edge location, unsuitable for additional residential density and that the proposal is premature, with a new county development plan due in two years. Submissions assert that housing expansion without matching infrastructure (roads, water, transport, community services) would be unsustainable and contrary to proper planning and that existing local infrastructure is already under severe strain in Edmondstown and surrounding areas such as Ballyroan, Knocklyon, and Rathfarnham and hundreds of the new units would further overload already stretched services.	land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has identified lands which have been carefully evaluated through a criteria-based approach to best meet the housing shortfall for 2028 with built-in additional capacity. **Zoning and Overdevelopment** The Planning Authority notes the concerns raised in the submissions in relation to zoning and phasing, including on an area identified in some submissions as the wider Ballyboden / Edmondstown / Whitechurch/ Knocklyon/ Cherryfield/ Rathfarnham corridor. In assessing the appropriateness of residential zoning, the Planning Authority is guided by the shared goals identified in the NPF and RSES as National Strategic Outcomes and Regional Strategic

Submission refers to the amendments affecting the Ballyboden / Edmondstown / Whitechurch/ Knocklyon/ Cherryfield/ Rathfarnham corridor, as affecting the 'corridor' and submits that Amendments Nos. 7, 12, 21, 22 and 23 together form a 'linked development-enabling package'. Regarding Amendment No. 7, it is requested that the existing zoning is retained. Submission supports properly planned housing growth and sustainable transport infrastructure but has serious concerns that the proposed variation will facilitate additional development capacity while weakening existing environmental protections, reducing residential amenity and introducing additional infrastructure pressures without adequate cumulative assessment. Concerns at the location, sequencing and infrastructure context of development in circumstances where transport capacity, community facilities, environmental protection and residential amenity have not been adequately assessed at corridor level. It is noted that the corridor is experiencing significant pressure on its transport network and community infrastructure and in this context believes that the variation risks facilitating development ahead of infrastructure rather than delivered in parallel with population growth. It is submitted that taken together the amendments represent a significant change in the planning balance within this corridor, enabling additional residential	Outcomes, namely the achievement and delivery of Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society. Specially, this includes: • Priority growth areas specified in the Metropolitan Area Strategic Plan • Compact growth and infill development • Brownfield/greenfield • Proximity to centres of services and social infrastructure • Proximity to high-capacity public transport These parameters were applied by the Local Authority in the assessment of lands for the Variation in tandem with the objectives of the South Dublin County Development Plan 2022–2028, as well as other relevant Section 28 Guidelines issued by the DHLGH, and the SEA and AA feedback. The subject lands are the only 'RU' zoned lands within the county located within the M50 corridor. Lands zoned 'RU' have the objective 'to protect and improve rural amenity and to provide for the development of agriculture'. All of South Dublin is located within the Dublin Metropolitan Area and is subject to the Metropolitan Area Strategic Plan set out in the Regional Spatial and Economic Strategy. The lands subject to this proposed Amendment at Edmondstown Road are also within the Dublin City and Suburbs settlement boundary.

development while reducing existing protections for agricultural land, high-amenity landscapes, community infrastructure and residential amenity. Taken with proposed changes to private amenity space standards and reduced separation distances, alongside increased flexibility in open space provision on institutional lands, it is submitted that the changes represent a series of planning decisions that collectively reduce existing protections for landscape character, open space and residential amenity within the corridor, gradually eroding the environmental and residential qualities that make the area an attractive and sustainable place to live.

Concerns are raised that the Variation may increase development capacity in the corridor without a corresponding framework for infrastructure provision, amenity protection or strategic planning coherence.

Phasing
It is submitted that sustainable planning policy generally prioritises development within existing serviced and appropriate urban lands before extending development into remaining greenfield areas.

Submissions highlight that the variation risks predetermining key land-use and infrastructure decisions before the Ballyboden LAP process has taken place. Reference is made to the LAP objective in the CDP - QDP14 SLO2. Given there is not a shortage of zoned land, rather the deliverability of already zoned land, it is questionable whether the zoning of

National Policy Objective (NPO) 16 of the Revised National Planning Framework states:
To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

City	Population 2022	2018 NPF	Population Growth to 2040[04]		Minimum Target Population 2040
		% Range 2016-2040	% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth (extract from Revised NPF 2025)

Also of relevance, National Policy Objective 8 requires:

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

Therefore, the proposed rezoning of these lands from 'RU' to 'RES' aligns with national and regional planning policy and the Settlement Hierarchy set out the CDP 2022-2028, facilitating growth within the Dublin City and Suburbs settlement area, ensuring compact and sequential patterns of growth.

Overdevelopment
Concerns are raised in submissions regarding overdevelopment in the area in recent years.

agricultural and amenity lands in this corridor has been adequately justified. Requests that the Ballyboden Local Area Plan be prepared before it is submitted that the variation risks predetermining key land-use and infrastructure decisions before the Ballyboden LAP process has taken place. Reference is made to the LAP objective in the CDP - QDP14 SLO2. Given there is not a shortage of zoned land, rather the deliverability of already zoned land, it is questionable whether the zoning of agricultural and amenity lands in this corridor has been adequately justified. Requests that the Ballyboden Local Area Plan be prepared before introducing additional rezonings or strategic road objectives affecting this area, noting that the variation is expressly limited in scope and does not constitute a comprehensive review of all relevant policies and objectives. It is submitted that it is not appropriate to use a focused housing-led variation to introduce substantial corridor-level rezonings and development-enabling road objectives in an area where the Development Plan itself already identifies the need for a Local Area Plan. It is stated that a LAP is intended to provide the detailed framework within which issues such as land use and other stated matters are considered in an integrated manner, plan-led and the introduction of corridor-scale rezonings and strategic road objectives in the variation should properly be examined through the Ballyboden LAP framework. **Zoning – Edmondstown Golf Club**	Since the adoption of the County Development Plan there have been 952 residential completions in the wider Templeogue, Walkinstown, Rathfarnham, Firhouse Neighbourhood Area as defined in the County Development Plan. These new homes are spread throughout the entire neighbourhood area with much of it delivered through smaller infill developments. The largest areas of development are in the planned Oldcourt-Ballycullen Local Area Plan lands which have delivered, and are continuing to deliver associated infrastructure including roads, cycle lanes, retail, school and community centre. Infill sites on Scholarstown Road and Stocking Lane have also delivered larger developments, with associated open space and facilities. This permitted development has undergone assessment at planning application stage and has met the required standards and policy within the County Development Plan and other legislative provisions. This area is within Dublin City and Suburbs, and as outlined above, is an area required by National policy to contribute to housing targets given that it meets the policy objective for compact and sustainable growth, reducing the need for urban sprawl in more remote lands and maximising efficiencies and investment in existing infrastructure and utilities. The proposed lands are also within Dublin City and Suburbs settlement area. The proposed zoning is accompanied by CS7 SLO6 which requires that '*A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority.'* For this reason, and the reasons set out below, it is not considered that there is overdevelopment in

Edmondstown Golf Club request that if any change to the current Rural Amenity zoning is considered, that these lands instead be zoned Open Space (OS) to align with the zoning of the wider golf course. Additionally, the Club requests that lands within its ownership currently zoned Residential, which comprise the 10th and 11th holes of the golf course, be rezoned to Open Space to accurately reflect their long-term recreational use and remove the existing non-conforming residential zoning, which will never provide residential development. Finally, should the adjoining lands outside the Club's ownership in amendment Ref. No. 7 proceed to a residential rezoning as proposed, the Club seeks the inclusion of a Specific Local Objective (SLO) similar to that applied to nearby residential lands to the south. This would ensure appropriate design and development controls are in place to safeguard the safe and continued operation of the golf course.

Agricultural lands and Heritage
Reference is made to Edmondstown Park which contains a protected structure (RPS Ref. 343) with mature specimen trees and a historically significant farmhouse expanded in 1792. The property retains historic elements, including William Hayes' original chemistry lab workbench, adding cultural significance. The farm offers long-established heritage value as a centuries-old working farm, integral to local identity. Preservation supports SDCC's Strategic Environmental Objective CH_1 and Landscape Objective LV_1 for the Dublin Mountains area.

the wider area or that the proposed zoning would represent overdevelopment.

Issues raised in relation to traffic congestion and pressures on public transport services and community and social infrastructure including schools are addressed in further detail below.

Public Transport
The NTA has indicated that Edmondstown Road is one of the lowest priority sites, from a transport accessibility point of view. The lack of access to public transport for this site and for the existing zoned lands at Whitechurch-Edmondstown is recognised. It is in this context that the Council is seeking to overcome the transport issues by way of amendments 22 and 23 which would both assist in unlocking the long-time zoned land immediately south of the M50 and facilitate the rezoning of the Edmondstown Road lands. A new specific objective for Amendment 22, the Edmondstown Road upgrade states:

'New 6 year roads objective for upgrade of Edmondstown Road is included in Table 7.5 Six Year Road Programme in the Written Statement as follows:

Road	**Description**	**Function**
Edmondstown Road Upgrade	Upgrade of existing road	To enhance pedestrian, cycling and public transport facilities and access to new residential lands.

It is submitted that the land forms part of an agricultural and rural landscape in the foothills of the Dublin Mountains including a long-standing working farm extending back hundreds of years at Edmondstown Park, a protected structure. This in turn, is part of an important historic cultural landscape, this being defined as areas where the interaction between human activity and the natural environment over time has created landscapes of heritage, environmental and social value. It is also submitted that there is ongoing educational and community value, including school visits. It is stated that the loss of these lands would represent the loss of productive agricultural land, rural heritage, built heritage, significant community and education loss and loss of local character and placemaking. While the SLO to retain hedgerows is acknowledged, it is stated that the principal objection is to the change of land use in a sensitive corridor and the SLO cannot convert an unsound strategic land use decision into a sustainable one. It is compared to Airfield in Dundrum in terms of community and educational gain. It is indicated that the family that owns the farm do not support the rezoning proposal and have stated this when the matter was raised in previous Development Plans.

It is submitted that the variation would result in the rezoning of long-established agricultural lands at Edmondstown, including a historic working farm and rezoning of high amenity lands at Cherryfield Way. It is submitted that the lands at Edmondstown and at

Amendment No. 23 is for a connecting road between Whitechurch Road to the east and Edmondstown Road to the west to facilitate the release of zoned lands at this location. The amendment includes a new specific objective to insert the following into Table 7.5 of the Written Statement:

Road	**Description**	**Function**
Link between Edmondstown Road and Whitechurch Road	New road / street and associated junction upgrades connecting Edmondstown Road and Whitechurch Road.	To provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands.

Having regard to both amendments proposed to Table 7.5 involving upgraded and new road connections, it is considered that while the lands are not currently served, or poorly served by public transport, it will become feasible to service once the necessary road upgrade is complete and the population grows. The provision of greater choice in mode share will facilitate a shift from the car to public transport and in time will ensure that congestion issues are not exacerbated. The Council will engage further with the NTA to facilitate appropriate and timely public transport connections to the lands.

Phasing

Cherryfield form part of the rural landscape of the Dublin foothills and contribute to the environmental and amenity character of the area. Concerns are raised that the Variation may increase development capacity in the corridor without a corresponding framework for infrastructure provision, amenity protection or strategic planning coherence. **Climate Action** It is submitted that modern development planning emphasises the importance of green infrastructure networks, including connected open spaces that support biodiversity, recreation and climate resilience. It is submitted that the farm operates on sustainable principles, supporting carbon sequestration, soil health, and climate-positive land management. Rezoning would undermine climate responsibilities by replacing sustainable farmland with carbon-intensive development. Maintaining the land in agricultural and green use aligns with climate mitigation, biodiversity, and long-term environmental stewardship, it is asserted. **Community and Social Facilities** There are objections to the proposed development of lands at Edmondstown Road by reason that the existing farm located there is a valuable local educational, cultural, and social resource and accessible green educational space for school children and families.	The Council notes the concerns raised across submissions regarding the importance of phasing and infrastructure led development in the context of the proposed zoning and Specific Local Objective (SLO) for the lands. The proposed zoning of the lands does not undermine infrastructure-led planning but is supported by a plan-led approach fully aligned with national and local policy. The Planning Authority is satisfied that the Specific Local Objective pertaining to Amendment No. 7, namely CS7 SLO6, in respect to items 'a', 'b' and 'c' provides an appropriate development framework in line with the scale and potential residential capacity of the subject lands. Furthermore, this proposed rezoning Amendment No. 7 is supported, in terms of transport infrastructure, by Amendments No. 22 and No. 23. However, having regard to the issues raised it is recommended that CS7 SLO6 associated with Amendment No. 7 be amended to include a new point 'd' that **'Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be delivered to provide for public transport improvements in advance of occupation of any units and measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 agreed with the NTA.'** The amendment to CS7 SLO6 as recommended, provides a clear commitment to the phased development of this area and infrastructure-led development.

There are objections to the proposed to the rezoning in the Edmondstown Road area due to the amount of development in the area already and the lack of community and social facilities to support it. It is submitted that childcare facilities, GP services, community amenities, and recreational facilities are already under considerable pressure in the area.

Reference is made to the variation which states that there is over 1,500 hectares of public open space in the county and that the overall standard for public open space, including parks is 2.4ha per 1000 population. It is submitted that when agricultural lands, high amenity lands and reserved school lands are reduced or removed while open space standards become more flexible, there is no corresponding increase in the community and recreational infrastructure that makes neighbourhoods liveable. These types of facilities are identified as library or other civic amenities, swimming pool, football pitches, indoor sports facilities, park, fire station, community centres, Garda station or primary care centre.

Reference is made to objective COS4 SLO2 in the South Dublin County Development Plan which states: "To promote actively the provision of indoor sports facilities to meet the needs of the growing population of Knocklyon–Ballyboden". It is submitted that this objective recognises that the Ballyboden and Knocklyon area already require additional community and recreational infrastructure and in this context is

In addition, in relation to Amendment no. 23 (Edmondstown Road - Whitechurch Road link) a further recommendation has been made by the Chief Executive to add to the existing SLO for the lands in the County Development Plan to include for phasing as follows:

Development of the subject lands shall be phased in accordance with the delivery of roads and public transport and active travel infrastructure to the satisfaction of the Planning Authority.

In addition, the CE has recommended that the new 6 Year Road Objective along Edmondstown Road (Amendment No, 22) be amended to relate specifically to newly developed residential lands, in the interest of clarity.

This is reflected in the amendments to Table 7.5 Six Year Road Programme in the Written Statement as follows:

Road	**Description**	**Function**
Edmondstown Road Upgrade	Upgrade of existing road	To enhance pedestrian, cycling and public transport facilities and access to new**ly developed** residential lands.

Both of these latter additional CE Recommendations to the proposed Amendments are included within the relevant amendment section of this report.

Active Travel
Submissions highlight that active travel is not a feasible option for all trip types, limiting alternatives to car dependency and creating additional pressure on private transport.

concerned that the increased population by way of the Variation may undermine the objective and asks the planning authority to clarify how the Variation is consistent with the objective. **Schools** It is submitted that schools are under considerable pressure in the area. There are issues raised around school place capacity. **Environmental Quality and Landscape Character** It is submitted that the variation would result in the rezoning of long-established agricultural lands at Edmondstown, including a historic working farm and rezoning of high amenity lands at Cherryfield Way. It is submitted that the lands at Edmondstown and at Cherryfield form part of the rural landscape of the Dublin foothills and contribute to the environmental and amenity character of the area. Concerns are raised that the Variation may increase development capacity in the corridor without a corresponding framework for infrastructure provision, amenity protection or strategic planning coherence. An addendum to the Ballyboden Tidy Town submission indicates that a locally circulated petition (link provided) highlights concerns over the potential loss or fragmentation of important open landscapes and amenities within the Dodder Valley, Cherryfield lands, Edmondstown agricultural lands and what is termed in the submission the Owendoher Linear Park corridor. It is	The promotion of active travel is a central objective of the South Dublin County Development Plan 2022–2028, and national planning policy. Amendment No. 7 must be read in relation Amendment No. 22 which proposes a new 6 Year Road Objective to upgrade Edmondstown Road to enhance pedestrian, cycling and public transport facilities and access to new residential lands, noting the recommendation of the CE above to include a further amendment to the SLO to incorporate phasing of delivery. A new 6 Year Road Objective is proposed under Amendment No. 23 for a new road / street and associated junction upgrades connecting Edmondstown Road and Whitechurch Road to provide an active travel and vehicular connection and access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands. While it is recognised that not everyone will be in a position to cycle, Amendment No. 7, in conjunction with Amendments No. 22 and No. 23, will improve pedestrian and cycling facilities in the wider area, making it more attractive for shorter trips and to get to public transport services for longer journeys. Also, CS7 SLO6 provides for a local centre to serve the day-to-day needs of surrounding residents as part of any future development proposal, unless otherwise agreed by the planning authority, encouraging sustainable movement and active travel within any future development.

stated that these landscapes form an important network of environmental and recreational amenities serving the Ballyboden and Knocklyon communities and are widely used for walking, outdoor recreation and environmental enjoyment. It is considered that this reflects a broader level of community concern, reflected also in the petition, regarding the long-term protection of these landscapes and their role within the wider green infrastructure network of the area. It is noted that otters have been recorded within the Dodder Catchment and that the Owendoher, Glin and Dodder are known otter habitats, citing and providing a link to the Dublin City Otter Survey, 2019. It is submitted that the environmental role of upstream landscapes such as the Edmondstown and Cherryfield lands should be carefully considered within the overall catchment context. **Riparian Corridor and Water Quality** It is noted that the Owendoher Stream crosses the site and flows into the Owendoher River, then the River Dodder, and ultimately the River Liffey. The Owendoher River is described as a pristine wildlife corridor that could be jeopardised by large-scale development, which implies potential downstream flooding or hydrological impact. It is submitted that additional development would increase flood-risk potential, especially due to the site's proximity to the	The Planning Authority considers that the proposed zoning at Edmondstown Road, in conjunction with CS7 SLO6 and amendment thereto as proposed in this CE Report which would provide for a phased delivery in line with road upgrades required for the delivery of public transport provides a robust framework to promote active travel, ensure safe and attractive walking and cycling environments, and integrate the site into an established and expanding active travel network. Accordingly, it is considered that development at Edmondstown Road can support and strengthen active travel patterns rather than undermine them. At planning stage, Traffic and Transport Assessments (TTA) and Mobility Management Plans will generally be required for large-scale developments. Site permeability and connectivity will also be required in line with active travel policy along with significant investment in pedestrian and cycle networks. Junction capacity, road safety, and cumulative impacts will also be assessed at application stage. Road Safety Audits and appropriate mitigation (for instance junction upgrades, traffic calming) will be required where identified as needed. In addition, developments will be designed to integrate with existing and proposed BusConnects corridors in this area, where that is relevant. **Community and Social Facilities** Submissions raise concerns regarding pressure on existing services due to recent residential development completed and ongoing in the area and the additional pressure put on services from the rezoning proposal and hundreds of houses potentially being provided on these lands.

Owendoher Stream. Retaining the lands as rural or open space would support biodiversity protection, maintain ecological integrity, and contribute to natural drainage and flood management, it is submitted. It is submitted that development would harm water quality along the connected river system. **Green Infrastructure and Open Space** It is submitted that, as development continues across South Dublin County, preserving remaining open spaces is increasingly important for community wellbeing, environmental quality and biodiversity. It is submitted that the subject lands adjoining Edmondstown Golf Club have the potential to function as part of a local ecological and green infrastructure corridor, supporting wildlife movement and environmental sustainability. It is submitted that retaining these lands as open space would contribute positively to biodiversity protection, drainage, and climate resilience. This would be in line with existing policy in relation to Green Infrastructure. It is submitted that the lands in question form part of the transitional landscape buffer between suburban development and the Dublin Mountains foothills and rural environments. The development of these lands would further encroach into the Dublin Mountains and be contrary to long term spatial policy.	The SLO pertaining to Amendment No. 7, namely CS7 SLO6, requires *'a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority.'* In addition, the required masterplan-led approach to the existing zoned lands to the south which will be better linked with these lands through the road upgrade at Edmondstown Road, will ensure that the necessary community and social infrastructure to serve the development on those lands, in proximity to the lands in this amendment, can be considered as part of that master planning process. Also, proposed upgrades to Edmondstown Road (Amendment No. 22) would also provide improved access to services at established local and village centres in the surrounding area. In addition, with regard to childcare place provision, the Council will continue to support the provision of appropriate childcare facilities through the development management process, in consultation with the South Dublin County Childcare Committee, as well as other key state bodies and consultees to ensure proposed facilities meet the required standards. The Council will also continue to liaise with the HSE and other relevant bodies and stakeholder to ensure adequate health facilities are supported in their development in appropriate locations, such as the Ballyboden Primary Care Centre on Edmondstown Road to the north of the subject lands.

It is submitted that Edmondstown Park functions as a sustainably run farm with exceptional biodiversity, including tens of species of grasses per square metre and is therefore a rarity worth protecting. It is submitted that the proposed rezoning contradicts SDCC's Biodiversity Strategic Objective, risking habitat loss and ecological degradation. The continuity of farming practices over centuries has created a high-value ecological landscape that cannot be replaced once destroyed. It is indicated that the site contains mature hedgerows and a woodland habitat of historical and ecological importance that would be severely damaged by residential development. It is submitted that the farm provides significant amenity, educational and community value, offering direct engagement with nature and animals. It is a unique open space in a highly pressured region, contributing to public wellbeing, recreation, and environmental quality. **Active Travel** It is submitted that active travel options do not adequately serve school runs or shopping, limiting alternatives to car dependency. Cycling into Dublin is only feasible for a small portion of the population, creating additional pressure on private transport.	It is important to note that the provision of community and social infrastructure in conjunction with planned growth is guided and supported by the CDP 2022-2028 and other SDCC policy documents such as the South Dublin County Local Economic and Community Plan (LECP) 2024–2030, the South Dublin Libraries Development Plan 2023-2027 and the Age-Friendly Strategy 2020-2024. In this regard, it is considered that Amendment No. 7 and its related SLO, together with the policies, objectives and standards of the CDP, together with other SDCC policy plans relating to community development and community and social infrastructure delivery, satisfactorily provides a framework for community development in tandem with any future residential development of this area, and strategic community and social infrastructure delivery in conjunction with planned growth at local and wider settlement level. **Schools** Concerns were raised that schools are under considerable pressure in the area and there are issues regarding school place capacity to absorb additional residential resulting from proposed Amendment No. 7. In recent years, at the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area, the following school place provision related activity and their status is noted: • New School – Gaelscoil Chnoc Liamhna, Dublin 16 – delivered in 2023. • Major Project to provide a new permanent school for Firhouse Educate Together Secondary School on Oldcourt Rd,

Compact Settlement Guidelines Submission highlights the reference made to the proposed changes to private amenity space standards and reduced separation distances, alongside increased flexibility in open space provision under the Compact Settlement Guidelines (2024) and submits that the changes represent a series of planning decisions that collectively reduce existing protections for landscape character, open space and residential amenity within the wider corridor. **Public Transport** It is submitted there is limited high-capacity public transport options available to support additional residential density. The area is also heavily car dependant. It is asserted that further development would exacerbate this situation. Buses already take up to 2 hours at peak times to get to the city centre and adding a large development will aggravate this issue. Buses are at capacity at peak times. The local roads are already unfit to deal with the current volume of traffic. Improvements of public transport connections and of roads is needed before development is built. Reference is made to the Ballyboden Tidy Towns Group v An Bord Pleanála & Ors [2022] IEHC 7 and the judgement, delivered on January 10, 2022, which found that the Board failed to adequately assess if public	Ballycullen, Firhouse, is currently at Stage 3 (Tender Stage). Firhouse ETSS is currently in temporary accommodation on the same site. • Major Project at Sancta Maria College, Ballyroan, to provide a new PE hall, changing rooms and toilets, is currently at Stage 2b (Detailed Design). • Major Projects at Templeogue College and the Libermann Spiritan School for extensions/additional accommodation are currently at Stage 2a (Developed Sketch Scheme). • Major Project at Clochar Loreto National School, Rathfarnham, for construction of 21 classroom primary school building is at Stage 3 (Tender Stage). The submission from the Department of Education and Youth indicates that their preference would be to expand existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. The Department raises concerns in the wider area regarding the proposed removal of the school site objective at Stocking Lane to facilitate residential development. This will be dealt with in the Chief Executive's response and recommendation to Amendment 21. It should be noted that the CDP 2022-2028 sets out numerous policies and objectives to guide and support school place provision within the County. The Planning Authority meets with the Department on a regular basis to actively review school needs and proposals to ensure adequate school places are delivered and planned for, in accordance with the needs and research undertaken by the Department.

transport capacity could support the development. The Court ruled that the Board failed to consider whether existing public transport could handle the increased demand from the proposed 486-apartment development. The project was deemed to be in material contravention of the local development plan regarding height, and the Board did not properly justify this departure. The judgement addressed inadequate reasons given regarding traffic expert disagreements. In this regard, it is submitted that this case highlighted the legal necessity for developers to demonstrate that high-density developments are “well served by public transport," rather than just offering frequent services. The NTA has observed that from a transport accessibility point of view Edmondstown Road is one of the lowest priority sites. It is submitted that Edmondstown lies midway between the Red and Green Luas lines, making both impractical for commuting. Bus services are already congested at peak hours, with no capacity for additional population. It is submitted that public transport on Edmondstown Road is limited, and nearby bus services are regularly full during peak hours. Increasing the local population without expanding public transport would worsen overcrowding and reduce service reliability. It is submitted that public transportation options in the area are limited and without significant improvements to public transport capacity and frequences, the area is not	**Ballyboden LAP** The Council notes the concerns raised that the proposals in this area are premature pending the preparation of a new Local Area Plan for Ballyboden as per QDP14 SLO 2 of the current CDP It should be noted that, under Part 3 of the Planning Act 2024, Local Area Plans no longer exist as a mechanism for land use planning and development. Development within the general Ballyboden area will continue to be guided by comprehensive provisions, including the zoning and related policies and objectives, within the current CDP, alongside provisions relating to the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area and other county-wide policies and objectives of the CDP. There will be opportunity to review the requirement or otherwise for an area plan for Ballyboden, notwithstanding that a boundary would have to be identified for it, as part of the review of the next County Development Plan. **Zoning - Edmondstown Golf Club** A submission from Edmondstown Golf Club seeks the following: - That if any change to the current Rural Amenity zoning is considered, that the subject lands are instead zoned Open Space (OS) to align with the zoning of the wider golf course. - That the lands within its ownership currently zoned Residential (RES), which comprise the 10th and 11th holes of the golf course, be rezoned to Open Space (OS) to reflect their long-term recreational use and remove the existing non-conforming residential zoning, which will never provide residential development.

currently equipped to support substantial population growth. **Traffic and Roads** Submissions raise concerns regarding existing traffic congestion being a major issue in the area, with regular delays and bottlenecks. It is submitted that proposed road widening will not solve congestion, as all traffic ultimately feeds into the same already overloaded road network. It is submitted that the existing road network serving the Knocklyon / Ballyboden / Edmondstown corridor is already under significant pressure, particularly during peak commuting hours. The area is heavily car dependent, with limited high-capacity public transport options available to support additional residential density. It is submitted that increased traffic would end up on the same spine that runs from Dundrum via Marley via Ballyboden via Scholarstown – an already congested road infrastructure – and invariably will lead to the M50 which is past full capacity. It is indicated that Edmondstown Road is a narrow local road and that it cannot absorb large scale residential development. SM4 SLO 1 has not been enacted. It is submitted that the junction between Scholarstown Road and Edmondstown Road and on down to the	- That, if the adjoining lands outside the Club's ownership in amendment Ref. No. 7 proceed to a residential rezoning as proposed, a Specific Local Objective (SLO) similar to that applied to nearby residential lands to the south. This would ensure appropriate design and development controls are in place to safeguard the safe and continued operation of the golf course. In this regard, it is noted that the current CDP has the following SLO on the 'RES' zoned lands at Whitechurch-Edmondstown which adjoin the golf club lands to the south: *COS4 SLO5:* *To ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.* With regard to the request for an SLO to be placed on the lands proposed for rezoning, it is considered that the existing SLO is sufficient, having a general application for future development. It is considered that proposed Amendment No. 7 to rezone the adjacent lands as 'RES' does not affect the existing established land use on the adjoining lands as a golf course. With regards to the rezoning of RES to Open Space at the 10th and 11th holes, Open Space is permitted in principle on lands zoned 'RES'. In addition, 'Recreational Facility' and 'Sports Clubs / Facility' are Open for Consideration under the CDP 2022-2028 on 'RES' zoned lands. As this Variation relates to the zoning of strategic lands to meet the NPF revised population and housing targets the rezoning of the golf course lands at this time is not considered

roundabout becomes completely blocked at rush hour and it will be worse when Fox's land to the south of Edmondstown Golf Club and the Augustinian site at Ballyboden are developed. It is submitted that development on this site would only worsen existing traffic congestion, despite the proposed widening of Edmondstown Road - all traffic still feeds into the Rathfarnham area (for city traffic) or Knocklyon area (for M50 traffic), with consequent deterioration of travel times. Planned developments (Whitechurch lands, Augustinian site) would dramatically increase traffic on Edmondstown Road, already a narrow and constrained corridor. Road widening will not solve bottlenecks, especially at Scholarstown Road/Taylor's Lane. Existing and future congestion risks making the road impassable at peak times, threatening emergency service access and public safety. Rezoning is premature, as road infrastructure is neither upgraded nor planned to support more housing. **Water and Wastewater** Reference is made to the Uisce Éireann submission to the variation noting that the 9B sewer is constrained and potential solutions may include sewer duplication and storage while interim solutions including separation of storm water, removal of infiltration, misconnections and SuDS must be looked at. It is further noted that the UE indicates that wastewater upgrades are likely to be required for Edmondstown Road and Cherryfield Way rezonings.	necessary particularly considering the current zoning does not impact on the use of the lands. **Agricultural Lands, Heritage and Climate Action** Submissions raise concerns regarding the loss of agricultural lands proposed under Amendment No. 7 and specifically the community educational and amenity value of the existing farm located at this site. Concerns are also raised regarding the impact of the proposed rezoning on heritage, given the Protected Structure status of Edmondstown Park located here. As outlined above, the 'RU' zoning 'To protect and improve rural amenity and to provide for the development of agriculture' does not align with the national and regional planning and development policy for areas defined in the settlement hierarchy as the 'Dublin City and Suburbs – Metropolitan Area' and located inside the M50 corridor. It is noted that there are a number of existing residential properties on the lands. In addition, it is acknowledged that rezoning the lands as 'RES' would facilitate their future development for residential use. The proposed inclusion of CS7 SLO6 under Variation No. 2 is to provide additional safeguards which would inform any future development proposal, recognising both the heritage value of Edmondstown Park, a protected structure, and its setting and curtilage but also existing hedgerows as recorded on 1st Edition OS mapping. Heritage concerns relating to the existing Protected Structure, namely Edmondstown Park, a two-storey Georgian style house (RPS

It is indicated that the cumulative wastewater implications of additional residential development should be clearly addressed. The High Court's emphasis on clarity, transparency and proper environmental assessment in planning decision-making is referenced and a submission states that this is particularly relevant where the variation is within a catchment where strategic wastewater infrastructure is constrained and hydrologically connected to downstream European sites. The cumulative infrastructure capacity at plan level needs to be assessed, noting the interaction between wastewater capacity, additional residential development and downstream water quality. Uisce Éireann's submission indicates as follows: 'Water Network: Minor upgrades (developer-funded) Sewer network: upgrades likely'. **Surface Water** It is submitted that the farmlands at this site currently absorb a large quantity of rainwater. If this land is developed, it will lose its capacity to absorb rainwater, and the storm water inflow to the Owendoher will magnify exponentially. It is noted that in recent years the underground car park of the apartments across the road to the site has flooded more than once due to Owendoher overspill upstream, and sandbags are required to divert water	Ref. 343), will be assessed in any future planning application on these lands under the County Development Plan and its numerous policies and objectives to ensure the protection of built heritage, as well as national guidelines in this regard. In addition, as outlined above, the SLO pertaining to Amendment No. 7, namely CS7 SLO6, requires a Design Statement as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage. Reference is made in the submissions to SDCC's Strategic Environmental Objective (SEO) CH_1 and Landscape Objective LV_1 for the Dublin Mountains area. It is noted that these provisions are set out in the SEA Statement for the CDP 2022-2028. *(CH_1) Protect places, features, buildings and landscapes of cultural, archaeological and / or architectural heritage from impact as a result of development.* *(LV_1) Protect and maintain the special qualities of the landscape character, especially with regard to areas of high amenity, the Dublin Mountain Area, and the River Liffey and River Dodder Valleys.* The SEOs assist in the prediction, description and monitoring of impacts on the environment as a result of the Plan. The Variation has included the site-specific recommendations of the SEA, including those incorporated into CS7 SLO6. In this regard, as outlined above the SLO has specifically sought a design statement and the retention and enhancement of the identified hedgerows. The Council notes that submissions highlight how the existing farm supports carbon sequestration, soil health, and climate-positive land management and that rezoning would be replacing sustainable farmland with carbon-intensive development.

flow from the entrance every time there is a prolonged period of heavy rain. **SEA, AA** It is noted that lands affected by the Variation lie within the Dodder Catchment which includes a network of tributaries including the Owendoher River and Whitechurch Stream, draining to Dublin Bay Natura 2000 sites. It is noted that the AA screening determination indicates that it cannot be excluded at screening stage that the Variation may have significant effects on European sites and that a Natura Impact Report is required. Concern is expressed that the documentation accompanying the variation does not provide a comprehensive cumulative assessment of environmental impacts at plan level, including the interaction of rezonings, road infrastructure proposals, the Knocklyon to Ballyboden active travel scheme and other permitted developments within the catchment and that there is too much reliance on later project-level assessment and mitigation. It is noted that the current Active Travel Scheme EcIA contains a cumulative impact assessment section for that scheme and identifies other planning applications in the area. There is particular concern that the combined effects of the variation in this area have not been transparently assessed as a single package for runoff, water quality, flood pathways, habitat disturbance and downstream European site implications. Groundwater sensitivity and aquifer vulnerability should also be considered in the	Amendment No. 7 aligns with national, regional and county level Climate Action objectives by supporting a compact approach to growth with the aim of facilitating the delivery of climate resilient and sustainable communities throughout the County. The efficient use of land with a focus on key urban centres, and achieving development densities that can support vibrant, compact, walkable places that prioritise pedestrian and cyclist movement is central to this, together with other Climate Action measures such as multi-functional green infrastructure and sustainable drainage systems (SuDS). **Environmental Quality and Landscape Character** The Council notes the concerns raised in submissions over the potential loss or fragmentation of important open landscapes and amenities within the Dodder Valley, Cherryfield lands, Edmondstown agricultural lands and 'the Owendoher Linear Park corridor'. Also noted are references to the otters recorded within the Dodder Catchment and that the Owendoher, Glin and Dodder are known otter habitats, and the Dublin City Otter Survey, 2019, as submitted. Questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process as well as a Strategic Flood Risk Assessment (SFRA) were undertaken in respect of the proposed variation, including the

cumulative environmental assessment where surface water and groundwater systems are interconnected. It is indicated that the permeable agricultural land and open landscape perform an important role in natural water attenuation within the Dodder Catchment and its hydrological functions including reducing peak flood flows. It is submitted that the Planning Authority should clearly demonstrate, at the level of the Development Plan variation itself, how the cumulative environmental implications of these strategic changes have been considered, including potential effects on the Dodder catchment and downstream European Natura 2000 sites. It is suggested that a detailed catchment scale hydrological assessment could help ensure that planning decisions within upstream areas do not inadvertently increase downstream flood risk or place additional pressure on river systems. The function of the River Dodder and its tributaries as an ecological corridor is also noted, forming part of a wider riparian network linking the upland foothills with the Liffey and Dublin Bay and providing habitat connectivity for a range of protected and notable species, including otter. A research piece on otters commissioned by Dublin City Council is included as a reference. It is indicated that the river corridors are recognised as important components of the County's Green Infrastructure network. It is submitted that the effects on ecological connectivity and riparian habitat corridors should also be considered as part of the cumulative environmental assessment of the proposed variation.	zoning of lands at Edmondstown. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation. All of the related documents to the SEA and AA process were available for public viewing as part of the public consultation. Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. This is set out below under SEA, AA and SFRA. In addition, any future development of the subject lands, environmental concerns relating to biodiversity, water quality and cumulative impacts will be subject to detailed assessment and mitigation, noting that the SLO requiring the retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping. It is noted that EIA was raised in a submission. The plan making process does not undertake EIA as this is something which is undertaken at project level. The equivalent process for plan making is the SEA, which as indicated above, has been undertaken and has informed the Variation. **Green Infrastructure and Open Space** Submissions highlight that as development continues across South Dublin County, preserving remaining open spaces is increasingly important for community wellbeing, environmental quality and biodiversity, supporting wildlife movement and environmental sustainability.

Reference is made, and a link provided, to an Inland Fisheries submission to a previous planning application (LRD23A/0002). It is indicated that the IFI submission highlight the Owendoher as a salmonid system and spawning and nursery tributary of the Dodder and that development discharges have the potential to pose risks to the aquatic environment if not properly managed. It is indicated that IFI had also noted the decline in the river's ecological status, currently at risk of failing to achieve the 'good ecological status' required under European water legislation. Concern is also expressed that, when read together, the proposed amendments may create internal inconsistencies within the Development Plan by increasing development capacity while weakening protections for community infrastructure (including education and health services), amenity (including open space, parks and sports facility capacity), development standard changes and environmental quality without a corresponding infrastructure framework. It is also noted that variations must comply with the requirements of the P&D Act 2000 (as amended), the SEA Directive the Habitats Directive and the EIA Directive and related environmental obligations. It is indicated that where a proposed variation introduces rezonings and infrastructure objectives within a hydrologically connected catchment and within an area subject to significant cumulative development	The SLO attached to the lands explicitly prioritises the safeguarding and enhancement of existing green infrastructure features, notably existing hedgerows as recorded on 1st Edition OS mapping, ensuring that they form a core structuring element of any future development layouts. The SLO reflects the SEA recommendations to ensure adequate protections for key biodiversity features. This approach reflects national and regional planning policy objectives relating to biodiversity conservation, climate resilience and the multi-functional role of green infrastructure in supporting ecological connectivity and quality of life. In addition, the County Development Plan has strong green infrastructure policy which will be applied as part of any assessment of future development on the lands. The CDP also includes a Green Space Factor which requires developers to attain a score based on green infrastructure criteria in order to meet the requirements for permission. With regard to request that the lands should be rezoned as 'OS', it should be noted that any future development proposal on this site must comply with the CDP 2022-2028 standards for public open space to be delivered on residentially zoned lands. As it stands, the lands are zoned RU and in private ownership. It should be noted that the South Dublin Parks and Open Spaces Strategy 2025 refers to the Templeogue/ Walkinstown/ Rathfarnham/ Firhouse Neighbourhood Area and states that there are excellent public amenities within the neighbourhood, including shopping, schools, public parks and cultural attractions. Pearse Museum, St. Enda's Park and Rathfarnham Castle are especially

pressures, it is particularly important that the planning authority clearly demonstrates how the proposed amendments remain consistent with the principles of proper planning and sustainable development and that potential environmental effects and the environmental carrying capacity of the corridor have been adequately assessed at plan level. **SFRA** It is noted that the Strategic Flood Risk Assessment regarding this rezoning (ref. Site 146 from that report), states "It is noted that the HEFS climate change flood extents have not been prepared for the Owerdoher (sic) River in the vicinity of the site... Pluvial and stormwater flood risk also needs to be assessed". In this regard, it is submitted that without doing a proper stormwater flood risk assessment, it is inappropriate to rezone this site.	popular attractions, set against the backdrop of the Dublin Mountains. It is further stated that Dodder Valley Park, Tymon Park and Greenhills Park, together with the adjacent Marlay Park and Bushy Park in the neighbouring county, contribute significantly to the amenity value of the Neighbourhood and to the Green Infrastructure network of the wider area. The Dodder River is considered a key Green Infrastructure Corridor and contains a proposed Natural Heritage Area and is also considered to be a key recreational and biodiversity resource running east-west through this neighbourhood. As a long-established neighbourhood, this area also has significant numbers of mature trees, all of which contribute to Green Infrastructure and Climate Adaptation measures. In addition, SDCC adopted its new play policy, The Nature of Play 2025–2028, focusing on creating accessible, inclusive, and high-quality play spaces. This policy aims to place playgrounds within 400m (5-minute walk) of all residential areas, emphasising sustainable, natural, and inclusive environments for children of all abilities. The Planning Authority will continue to implement the key actions of the Parks and Open Strategy and new Play Policy, together with the provisions of the CDP 2022-2028, and proposed amendment thereto, to continue to provide high quality open space and play spaces through the County including within the Templeogue/ Walkinstown/ Rathfarnham/ Firhouse Neighbourhood Area. **Compact Settlement Guidelines** The Council notes the reference made to the proposed changes on foot of the *Compact Settlement Guidelines (*2024) and suggestion that collectively it reduces existing protections for landscape

	character, open space and residential amenity within the wider corridor. It is noted that the *Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities* (*Compact Settlement Guidelines*) (2024) have been subject to Strategic Environmental Assessment (SEA). The CDP 2022-2028 has been subject to SEA. The proposed Variation No. 2 of the CDP 2022-2028 has been subject to SEA. The subject lands, and Amendment No. 12 Cherryfield Way, are designated as 'N/A' under the Landscape Character Assessment Sensitivity Map in Appendix 9 of the Landscape Character Assessment (LCA) of the CDP 2022-2028. 'N/A' or 'Suburban South Dublin' in terms of its Landscape Character is described as follows: *Built-up urban area with extensive housing estates and industrial /commercial parks. Variety of house styles and layouts dating from the late 19th century to late 20th century. The settlements of Rathfarnham, Templeogue and Clondalkin with important historical legacy and remnants. Major traffic corridors with M50 traversing north- south through the area, and Luas line travelling north from Tallaght, parallel to the M50, to city centre. Corridors of natural and semi natural vegetation, notably along the River Dodder (a linear park) and the Camac River. Grass open spaces in gardens, industrial parks, golf courses, school playing fields, and miscellaneous spaces in housing areas. Street trees planting and recreational facilities – public parks and golf courses - provide amenities and ecological resources.*

	The principles for development within this area under the LCA are: • *Grassland and other amenity area open spaces should be managed for the dual benefits of public access and biodiversity* • *Tree and shrub planting should be an integral component of amenity grasslands (schools recreational grounds, golf courses and playing fields)* • *The development of green infrastructure to connect different habitats within the urban context.* • *Tree planting on streets and open spaces – particularly on 'miscellaneous 'open space in housing areas- to improve their character* • *Enhance connectivity between open spaces as a means of enhancing biodiversity while providing off road connections for pedestrian and cyclists.* • *Proposed developments should be audited for their impact on views particularly those to the rural hinterland of the county* The Compact Settlement Guidelines amend the area of private open space required to be delivered as part of development. They also include policy on public open space which is reflected in the proposed amendments to the written statement. However, this does not change the current default standard set out in the County Development Plan for 2.4ha of open space per 1000 persons. It is considered that Variation No. 2, including the proposed amendments to the Written Statement to ensure alignment with the *Compact Settlement Guidelines* (2024) and SPPRs set out therein, do not reduce existing protections for landscape character as set on the CDP 2022-2028.

	Water and Wastewater It is noted that Uisce Éireann (UE) in their submission indicates as follows: '*Water Network: Minor upgrades (developer-funded)* *Sewer network: upgrades likely'*. Submissions make reference to Uisce Éireann's submission, in particular regarding the 9B sewer and wastewater upgrades that are likely to be required for Edmondstown Road and Cherryfield Way rezonings. While comments have been made in their submission to the Planning Authority on strategic requirements for upgrades, for these lands UÉ have indicated that minor upgrades to the water network can be developer funded and that upgrades are likely for the sewer network. Prior to development, developers have to engage with UÉ to get a pre-connection agreement and at that stage further detail will be available to the developer on what is required. Further engagement with UE was undertaken by the Planning Authority following the statutory public consultation to address further issues raised in submissions relating to these lands and other amendments. UÉ provided the following information: • *Water Supply: Edmondstown Road – should customers be experiencing pressure issues they should contact UE customer services to report that service improvements are required.* • *Wastewater Drainage: Sewer Network Constraints – As stated previously a feasibility Study /concept design is underway for the Catchment.*

	Utilities In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. A submission was received from the Electricity Supply Board (ESB) with regard to the overall variation, which indicated no site-specific objections to the proposed variation. SDCC is currently engaging, and will continue to engage, with both Eirgrid and ESB to facilitate the wider upgrade requirements for the electricity network. In relation to individual sites, connections to the network have to be agreed with ESB by the developer for new developments. The proposed zoning of the lands does not undermine infrastructure-led planning but is supported by a plan-led approach fully aligned with national and local policy. **Environmental Assessments** The Council notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation,

	including the zoning of lands at Edmondstown. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation. Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. Following this review of the issues raised, the following comments were received: 'The potential effects on the receiving waters on the Dodder catchment are addressed and assessed at strategic, county scale in proportion to the county scale of the proposed variation. The SEA and NIR will provide more cumulative assessment across the proposed variation on surface and groundwater by way of assessment of Proposed Variation lands across sub catchments identified under the WFD. This complements the existing data from WFD in relation to water quality in and around the plan area. **AA:** Section 7.2 of the NIR states: "*.. of the four European Sites being examined as part of the assessment of the hydrological pathway, only three are connected to the project site via the surface water pathway. The nearest point of the three Dublin Bay European Sites from a Proposed Variation Land or Future Strategic Long-term Development Area is approximately 13km downstream (i.e. downstream from Proposed Variation lands Cherryfield Way along the River Dodder). The River Dodder and the waters discharging from it to the Liffey Estuary represent a minor fraction of the overall volume of freshwater draining into the Liffey estuary and Dublin Bay. This will limit the*

	potential for future projects facilitated by the Plan, even in the event of the release of contaminated surface water from synchronous development in multiple Plan areas from having a perceptible effect on water quality and the conservation status of European Sites at Dublin Bay. This point is supported by previous studies which have shown that pollutants in the estuary are rapidly mixed and become diluted within the estuary and Dublin Bay (O'Higgins and Wilson, 2005; Wilson and Jackson, 2011), demonstrating that any potential for the release of contaminants to hydrological pathways and Dublin bay will not have the potential to result in any perceptible effect to water quality downstream at Dublin Bay." It is beyond the scope of the SEA to undertake specific county level assessment of water and wastewater infrastructure capacity and network as it must rely upon the most recent and available data on water supply and wastewater provided by Uisce Éireann. This is already included in the SEA and NIR as appropriate. Text above from Section 7.2 of the NIR refers. It is noted that concerns are highlighted in relation to cumulative and in combination effects. Section 7.5 of the NIR and Section 7.3 of the SEA ER identify and comment on the potential for significant cumulative effects arising from plans in particular, given this is a county scale land use plan. Plans and programmes considered as part of this assessment includes the hierarchy of land use and related plans pertinent and relevant to the Proposed Variation, namely: • National Planning Framework First Revision, • River Basin Management Plan for Ireland 2024, • Eastern and Midland Regional Economic and Spatial Strategy,

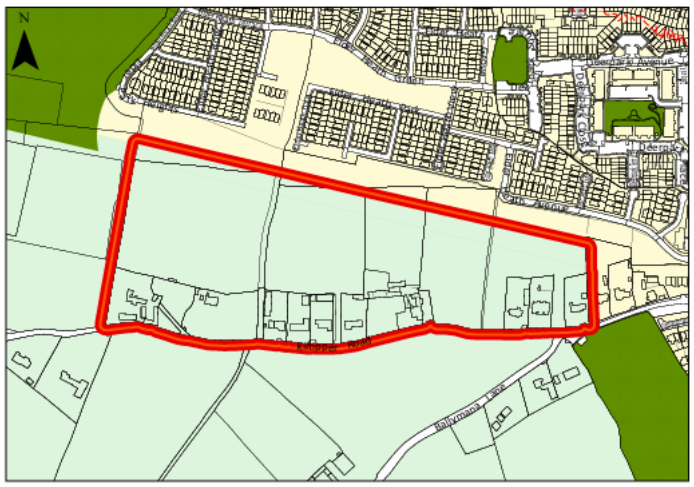
	• Catchment-based Flood Risk Assessment and Management (CFRAM) and Flood Risk Management Plans, • Greater Dublin Drainage Project, • National 4th Biodiversity Action Plan 2023-2030, • Transport Strategy for the Greater Dublin Area 2022- 2042, • South Dublin Climate Change Action Plan 2024 -2029, • BusConnects, • DART+ South West and DART +West, • Dublin City Development Plan 2022 -2028. Dún Laoghaire Rathdown County Development Plan 2022 -2028. Kildare County Development Plan 2022 -2028. Fingal County Development Plan 2023 -2029. All of the above plans and programmes have been subject to full SEA and AA and where relevant project level assessment via the EIA and AA Directives. As the SEA and AA conclude relating to transport related projects: *Of the above transport related projects BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale.* Any potential land use projects that may arise will, at that scale be required to seek a confirmation of feasibility from Uisce Éireann for water supply and wastewater. At county scale environmental assessment, it is not proportionate or realistic to undertake detailed

	capacity studies in relation to water and wastewater and as stated above, this information and data is undertaken by Uisce Éireann and therefore the assessments must rely on this information provided at county scale. Consideration of projects that are currently going through the planning process is somewhat speculative and again beyond the scope of the SEA to consider all active travel projects or proposals under consideration by SDCC or TII. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach through the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the proposed lands which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process. Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the

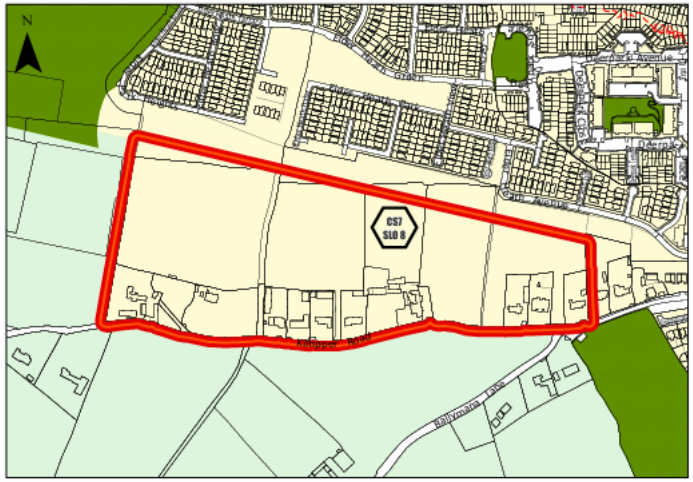
	Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **SFRA:** The SFRA confirms Edmondstown Road site is not within Flood Zone A (1% AEP) or Flood Zone B (0.1% AEP). The SFRA explicitly acknowledges: 'It is noted that the HEFS climate change flood extents have not been prepared for the Owendoher River in the vicinity of the site. HEFS flood extents for the area are included in the SDCC's development plan flood zone mapping and SFRA; these maps do not indicate any flooding within or in the vicinity of the site.' The SFRA further requires pluvial and stormwater flood risk to be assessed and appropriate finished floor levels (FFLs) to be set. **Conclusion** South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands subject to this Amendment no. 7 are located within the Dublin City and Suburbs Settlement Area, and having regard to the need for compact settlement and to identify lands for 'additional provision', and to the associated Amendments to upgrade the adjacent road infrastructure, the subject lands are considered to meet with the requirements of the Revised National Planning

	Framework and to be in the interests of proper planning and sustainable development. As set out in Section 2 of this CE Report, it is also noted that the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation To amend the Proposed Specific Local Objective CS7 SLO6 for the Edmondstown Road lands as follows: Development on the RES zoned lands on Edmondstown Road shall comply with the following: a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority. b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage. c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping insofar as possible within development proposals. **d. Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be complete prior to the occupation of development. Measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 shall be agreed with the NTA.** **Note**: CE Recommendations for Amendments 22 and 23 which are referenced within this report and have a bearing on these lands are included further below within the report for those Amendments.	

AMENDMENT NO. 8 - Kiltipper Road



Existing



Proposed

Submission No.

SD-C401-CDP25-125 – Carmel Adderley

SD-C401-CDP25-128 – Lisa Flynn

SD-C401-CDP25-130 – Eimear Tracy

SD-C401-CDP25-131 – Ian Flynn

SD-C401-CDP25-132 – Anthony O'Neill

SD-C401-CDP25-133 – Shane Regazzoli

SD-C401-CDP25-134 – Tanya MacDermott

SD-C401-CDP25-135 – Aisha Ali

SD-C401-CDP25-136 – Catherine McAuley

SD-C401-CDP25-137 – Nicola O Gara

SD-C401-CDP25-138 – Leanne Ryan

SD-C401-CDP25-139 – Katherine Fry

SD-C401-CDP25-140 – Richard Adderley

SD-C401-CDP25-142 – SURESH KRISHNAN

SD-C401-CDP25-144 – Darragh Kirby

SD-C401-CDP25-145 – Emma Gorman	SD-C401-CDP25-324 – Katie Costello	SD-C401-CDP25-327 – Erica Sullivan
SD-C401-CDP25-329 – Vera Potoraca	SD-C401-CDP25-333 – Ruby Devlin	SD-C401-CDP25-379 – Ruby Devlin
SD-C401-CDP25-466 – Stephen Harbron	SD-C401-CDP25-467 – Kelly Hogan	SD-C401-CDP25-468 – Dan Matei
SD-C401-CDP25-470 – Kelly Hogan	SD-C401-CDP25-498 – Deirdre Watters	SD-C401-CDP25-698 – Garreth Brennan
SD-C401-CDP25-708 – Michael Marshall	SD-C401-CDP25-709 – Lucy Stephens	SD-C401-CDP25-717 – Emma Bermingham
SD-C401-CDP25-726 – Sara Kavanagh	SD-C401-CDP25-742 – Fiona Murphy	SD-C401-CDP25-759 – Stephanie Maher
SD-C401-CDP25-815 – Lucas Pervan	SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-885 – Julija Labutiene
SD-C401-CDP25-918 – Barbara Cox	SD-C401-CDP25-1275 – Stephen Byrne	SD-C401-CDP25-1375 – Office of the Planning Regulator
SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1501 – Tracy Armstrong	SD-C401-CDP25-1513 – National Transport Authority
SD-C401-CDP25-1531 – John Lahart TD	SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1725 – Department of Education and Youth

Summary	CE Response
Zoning Submissions generally object to the proposed rezoning of the subject lands. Rezoning the land for	**Site Context** The lands proposed within the Variation comprise of open grassland and treelines / hedgerows with existing dwellings along Kiltipper Road

residential use without guaranteed and time-bound infrastructure investment risks placing unsustainable pressure on existing communities. Concerns are raised in relation to the loss of essential green space currently occupying the lands. The loss of the open space would diminish the environmental quality of the area and result in air quality issues as a result of increased traffic. It is further highlighted that Brownfield sites and already-serviced lands should be prioritised before zoning greenfield land. **Overdevelopment** The submissions highlight that there is substantial residential development of over 600 homes under construction in the immediate proximity of the proposed rezoning lands. Kiltipper cannot sustain additional residential zoning without substantial investment in infrastructure and community facilities. Issues are raised with the addition of approximately 1,500 new homes in a relatively short period of time. Concerns are raised in relation to capacity issues associated with the local drainage networks. Further rezoning at this stage would effectively compound growth without allowing the local area to absorb or adapt to the scale of development already underway. The cumulative infrastructure impact should be assessed and relevant mitigation works are considered to support any additional growth.	to the south. Elder Heath estate is to the north, with pylons running along a linear area of open space separating the existing estate from the proposed lands. Amendment No. 8 set out in the proposed Variation No. 2 to the South Dublin County Development Plan seeks to amend the current RU zoning to Residential (RES) to protect and/or improve residential amenity. The proposed rezoning includes a Specific Local Objective (SLOs) as follows: CS7 SLO8 for development on RES zoned lands shall comply with the following: - *A Transport and Traffic Assessment shall be carried out and submitted to the planning authority as part of a planning application for residential development on the subject lands, addressing access to and from the subject lands, measures to alleviate the impact of the proposed development on the surrounding road network, proposals to upgrade Kiltipper Road where necessary and active travel links from the subject lands to the surrounding area.* - *Existing hedgerows shall be retained insofar as possible within development proposals and the north-south hedgerow representing the townland boundary of Oldbawn-Killinarden shall be protected.* **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan

Uisce Eireann indicates that upgrades may be required to support development at the subject site but these could be developer-funded. ESB identifies several network reinforcement initiatives that are currently underway or being evaluated through South Dublin to address substation capacity constraints and main maintain security of supply. **Social Infrastructure** The submissions highlight capacity issues associated with schools, health services, childcare facilities and community amenities. It is stated that the proposed variation does not clearly demonstrate how this supporting infrastructure will be delivered in tandem with new housing. Rezoning land for residential use without guaranteed and time-bound infrastructure investment, risks placing unsustainable pressure on existing communities. Before any rezoning provision for additional primary and secondary school capacity is considered to support additional housing, new schools or expansion to current schools are required. There is no credible plan presented to address the future need for local services. The area has limited access to grocery shops, cafes and pharmacies. Residents must travel by car to nearby centres such as Old Bawn or Citywest for essential shopping, coffee shops, and community services. The	period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5

additional zoning would undermine the creation of a sustainable self-sufficient community.

The submissions state that existing residents in the area are largely dependent on travelling to Old Bawn, Citywest, or other centres for basic grocery shopping, pharmacy services, cafés, and community facilities. It is highlighted that recreational facilities are already overstretched in the area. It is further identified that there is currently one community centre serving thousands of homes.

It is suggested that additional school, healthcare and community amenities should be planned to support the additional growth in the area.

The Department of Education and Youth (DoEY) notes the variation refers to the population growth identified for SDCC in the recent Development Plan (2022) and NPF target by 2031. The DoEY highlights the importance to examine the potential of protecting a land buffer around each school to enable them to expand further if required. The DoEY states that school provision can only be planned and delivered when demand has materialised and available capacity in existing schools is utilised first. It was outlined that the department's preference would be to expand on the existing facilities where possible should there be a requirement for additional school places resulting from planned population increases. School provision can only be planned and

hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030.

The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP.

Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity.

Zoning

The lands identified at Kiltipper Road are within Dublin City and Suburbs Settlement boundary.

National Policy Objective (NPO) 16 of the Revised National Planning Framework states:

To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

City	Population 2022	2018 NPF	Population Growth to 2040[84]		Minimum Target Population 2040
		% Range 2016-2040	% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth (extract from Revised NPF 2025).

delivered when demand has materialised and available capacity in existing schools is typically utilised first. Nevertheless, it is noted that that the Development Plan seeks to retain provision for community facilities to ensure such facilities have the opportunity to be delivered once projecting population emerges. **Traffic And Roads** The submissions highlight concerns in relation to traffic congestion on surrounding road networks in the area. There is considerable traffic congestion on the Old Bawn Road, N4, N7 and N81. Kiltipper Road and the surrounding network are already heavily congested at peak times, with no remaining capacity to accommodate the additional traffic. Adding more housing on top of the 600+ units currently under construction beside Elder Heath would place an unsustainable strain on the local road network and push it beyond breaking point. A recent example of the burden that will occur without the changes to the infrastructure is evident from the recent increase in traffic along the Kiltipper Road from the recent temporary closure of the road to Ballinascorney. The existing road network in the area is inadequate. Roads are already narrow in parts, and there is a clear lack of sufficient pedestrian pathways and dedicated	In addition, National Policy Objective 8 requires: *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.* As outlined above, the revised NPF targets alongside the need for 'additional provision' requires the identification of significant lands to deliver the housing required. South Dublin is continuing to drive delivery on brownfield and regeneration lands in areas such as City Edge and the Tallaght LAP lands. However, this will not meet the immediate needs required by the NPF targets and associated guidelines. It is noted that 91% of the current zoned capacity is within or directly contiguous to Dublin City and Suburbs with almost half of that identified as brownfield. However, it should be recognised that such lands present challenges to support development in terms of contamination, landownership and site assembly, phasing and sequencing. The proposed rezoning of these lands from 'RU' to 'RES' given their location and characteristics is required to ensure the flexibility needed for delivery and provides for sequential and compact growth, aligning with national and regional planning policy and the Settlement Hierarchy set out the CDP 2022-2028. The submission from the developer supporting the rezoning is noted. The concern about loss of green space is noted however these lands are positioned within close proximity to existing residential settlement to the north of the site and established built form occupies the majority of the southern portions of the lands. The site characteristics allows for

cycle lanes. Congestion at peak school times is already severe, creating unsafe conditions for children walking or cycling. Increasing the housing stock without widening roads, improving junction design, and delivering safe, segregated cycle lanes will significantly worsen traffic congestion and compromise road safety. The submissions highlight that bus lanes should be included in the area, rather than cycle lanes. The submissions suggests that a detailed traffic and transport assessment is completed. Road upgrades and public transport improvements should be scheduled and funded. **Public Transport** The NTA has indicated that one of the lowest priority sites when considering transport accessibility is Kiltipper Road. The submissions state that public transport services are frequently overcrowded and there is a lack of capacity to accommodate additional housing growth. Increasing residential density without first delivering transport upgrades will lead to car dependency resulting in further congestion issues. The submissions highlight that there is a need for increased bus frequency and improved connectivity to employment centres, educational institutions, and	a natural extension of the residential environment positioned north and east of the lands. A number of submissions indicate concern at the level of development in the area including the Killinarden development further to the west. It is considered that the Killinarden development will facilitate infrastructure that will be beneficial to the wider area, including the provision for a new road network and links to Blessington Road in proximity to the Variation lands. This connection would provide a route to the new improved bus services which will also serve the subject lands. The Killinarden lands also include new and upgraded open space areas which will benefit the wider community. Therefore, it is considered that the lands can support compact settlement objectives and provide the opportunity to support strategic housing growth targets in the County. Overall, residential development on these lands would focus development next to the established urban settlement areas north and east of the lands. The proposed rezoning of these lands would help support the Council's ambitions to meet demands for housing delivery in the County. **Social Infrastructure and Overdevelopment** *Schools and Childcare* The area is served by multiple primary and post primary schools (for example St Martin de Porres National School, Sacred Heart Primary School, Old Bawn Community School, Killinarden School, Scoil Chaitlin Maude). The Department of Education and Youth's submission is noted. There is no reference for a need for new schools in this area by the Department. There are a number of key school projects being undertaken in the area

wider transport networks would be essential for housing expansion in the area. The submissions state that the bus routes in the area currently do not cater for the school transport needs. **Environmental Impacts** The submissions highlight that the continued loss of open space would erode the environmental character of the area and contribute to deteriorating air quality associated with increased traffic volumes. Protecting remaining green areas is vital to maintaining community wellbeing and environmental sustainability. The submissions raise environmental concerns, stipulating that the lands currently act as an important natural habitat for a significant amount of local wildlife. Foxes, bats and deer are all regularly seen in the area, and large-scale development risks seriously disrupting established habitats and wildlife corridors. Any proposal to rezone or develop these lands should be backed up by thorough ecological assessments and strong biodiversity protection measures. The submissions highlight that there is a significant hedgerow located on the land which could be considered as a town boundary and should be retained for its historical and cultural importance.	aligning demand and future population growth. New school upgrades at St. Thomas National School are currently under construction. Furthermore, there are major project improvements proposed at Tallaght Community School, Scoil Maelruain Senior National School and Scoil Maelruain Junior National School. It is also noted that a number of schools in the area are situated on large plots which provides opportunities to extend on these existing schools to improve on capacity and facilities should it be required. The Planning Authority will continue to work with the Department through a Memorandum of Understanding to proactively identify and acquire sites for new primary and post-primary schools, where required. In relation to childcare facilities, planning applications are assessed on the need to provide childcare facilities as part of development, having regard to childcare guidelines and taking account of the existing level of facilities. Where these are identified as being required they will be conditioned as part of development. Policy COS7 of the County Development Plan supports and facilitates the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee. The Planning Authority will continue to promote childcare facilities in the area. It is noted that there are number of childcare facilities currently within the area (e.g. Cocoon Childcare, An Cosan, Little Ladybird Creche and Montessori). *Community and Recreational Facilities* The concerns in submissions on community and other facilities and services is noted. COS2 SL02 of the County Development Plan adopted in 2022 identifies the need to examine the need for increased community infrastructure for the growing populations of Kiltipper,

Development near rivers like the Dodder will disrupt riparian buffer corridors that are essential for the migration of flora and fauna. **Flooding** Submissions highlighted historical flooding of the Kiltipper Road lands prior to the installation of a French drain by the developer (i.e. Kelland Homes) and expresses concern that construction activity and ground compression with heavy construction vehicles will cause flooding to recur. **Other Considerations:** Housing Affordability The submissions query the intended sale and ownership model of the homes on site. Housing policy should prioritise sustainable communities and home ownership opportunities for local families rather than speculative investment. Elder Heath Development Objections are raised to the rezoning based upon the developer's failure to satisfactorily complete works in the existing Elder Heath development. Several key commitments in that development remain outstanding or delivered in an unacceptable manner. Plans for a creche on this site failed to follow through. Design and Scale	Killinarden, Marlfield, Ellensborough, Aylesbury and Old Bawn in light of recent population growth. The area currently includes a variety of sports clubs and facilities that would be available to new residents in the area. The site will also benefit from close proximity to Kiltipper Park, with both passive and active recreation available and where improvements are ongoing with works including new footpaths and pedestrian access upgrades. Killinarden Park lies to the northwest and Elder Park, immediately to the west has been subject to recent improvements and borders the proposed lands. The northern portion of the existing sports facility adjoining Elder Park will be amended to provide a new dedicated car park and sports pitch. In addition, there are considerable works done in relation to the Dodder Greenway Route that would provide recreational benefits for existing and future residents in the wider area. Work is progressing well on the Whitestown Way greenway providing a new green infrastructure corridor along the Whitestown Stream between Killinarden Park and Sean Walsh Park. This project will link to the Dublin Mountains Way and the Dodder Greenway. A Part 8 planning approval now in place for the proposed bowling green in Sean Walsh Park. Furthermore, the Killinarden development currently under construction, separated from the proposed lands by the open space at Elder Park, will include a community centre (c.627 sqm) at Elder Park, a local centre with a creche (c.1,083 sqm) and retail/commercial units (c.580.5 sqm total). The proposed lands are proximate to bus services along Killinarden Heights that provide a direct service to the Square Tallaght which

Numerous submissions highlight that any proposed housing at the site should be appropriate in scale and design in keeping with the character of the area. The importance for any development on site to respect the existing character of the area with appropriate density levels, building heights and protecting residential amenity of nearby residents is emphasised. High-rise buildings or large apartment blocks would be entirely out of character with the locality. Kelland Homes A submission is made on behalf of Kelland Homes Ltd welcoming the proposed rezoning of the lands. The northern portion of the subject lands directly abuts Elder Heath to the north and this area is currently zoned as RES. The Elder Heath development has been laid out to allow for direct access connections from the subject lands and as such consolidating residential development ensuring compact growth is achieved. It is further outlined that there are nearby developments granted permission in the area and therefore to develop the subject lands for housing follows the existing pattern of development in the immediate area whilst also delivering an appropriate density of development for new homes. The site is located within the Metropolitan Area of Dublin City and residential development would be in	provides higher level retail, shops and cafes for the wider area. Marlfield Mall contains some local commercial amenities to residents in the direct area and as indicated above, there is a planned local centre as part of the nearby Killinarden development. While health infrastructure is not within the remit of the Planning Authority to deliver it is supported through Development Plan policy. It is noted that there are existing GP practices within close proximity of the lands. In addition to this, the site is accessible to Tallaght University Hospital and the associated specialist health care in and around Tallaght. On this basis, the subject site is considered to be adequately supported by existing and committed social infrastructure to support the proposed rezoning. **Utilities Infrastructure** Uisce Éireann made a submission to the Variation No.2 and highlighted that upgrades may be required to support development at the subject lands and these should be developer-funded. UÉ indicated that Drainage Area Planning is ongoing in the Greater Dublin Area across numerous catchment areas that will inform any potential upgrade interventions. Prior to development, it is a requirement for developers to engage with UÉ and to have a pre-connection agreement. Given the submission from UÉ has not indicated that any constraints could not be overcome by developer upgrades it is considered that the site is serviced or serviceable.

accordance with the Sustainable Residential Development and Compact Settlements Guidelines. A Transport Assessment supports the submission highlighting that the lands and wider areas are characterised by: - Direct connectivity to the N81 - Access via Elder Heath - Pedestrian footpath infrastructure - Residential cycling environments - Proximity to Luas at Tallaght The Transport Assessment highlights that access points to the south next to Kiltipper Road would not be required and active travel infrastructure can be extended seamlessly into the lands. It is outlined that the subject lands occupy a sustainable and well-connected position within the metropolitan area. Bus stops are located along Kiltipper Road and Killinarden Heights within convenient walking distance of the Elder Heath estate. The principle bus routes nearby are Routes D4, 82, 85 and X47. The D4 operates as part of the BusConnects network and provides a high frequency radial service connecting Tallaght to the City Centre. These bus services provide connections to Tallaght Town Centre and numerous surrounding suburban destinations. The nature of the development and its relative location to the catchment dictates that the modal	The ESB acknowledges the aims of the proposed Variation No.2 of the Development Plan (2022) and notes the increased reliance on electricity, combined with climate change impacts are driving the need to enhance the reliability and resilience of the network. ESB identifies several network reinforcement initiatives that are currently underway or being evaluated through South Dublin to address substation capacity constraints and main maintain security of supply. Coordination between SDCC and ESB will continue to ensure secure suitable sites for the development of key electricity infrastructure is considered to support additional housing targets. **Traffic And Roads and Public Transport** *Traffic* Local residents raise concerns in relation to traffic congestion in the area and any additional growth at the subject site and Killinarden/The Foothills cannot be accommodated on the local road network. The Planning Authority acknowledges these concerns. However, as set out as part of Amendment No. 8, a Specific Local Objective (SLO 8) includes the requirement for a Transport and Traffic Assessment to be carried out and submitted as part of any planning application for residential development on the subject lands. This assessment would address access to and from the subject lands, include measures to alleviate the impact of the proposed development on the surrounding road network, potential proposals to upgrade Kiltipper Road where necessary and promote active travel links from the subject lands to the surrounding area. As such, this analysis would ensure any residential development on site would not result in any detrimental impact on the local road network whilst demonstrating appropriate mitigation measures or upgrades required to ensure road safety is addressed appropriately.

choice to and from the site would primarily be via private car but with some elements of public transport use. Trip generation analysis was included in the Transport Assessment setting out vehicle movements while considering a potential development at the site. Further modelling was conducted highlighting that developing the lands would not have an adverse impact on the safe and efficient operation of the local road network. The distributed nature of this access strategy avoids reliance on a single junction and allows traffic associated with the proposed development to disperse efficiently across the surrounding local road network. The existing distributor function of Kiltipper Road can be maintained, and the proposed development can be integrated into the established street network through the existing Elder Heath access framework. The submission includes drawings demonstrating an indicative road layout demonstrating potential vehicular, active travel and cycle connections. The submission states that all services, access, social and community facilities are available. Kelland Home Ltd have built extensively in the Tallaght area and are in a position to deliver housing within an efficient timeframe. The site is located in a long-established suburban residential area, within the built-up footprint of Dublin City and its suburbs, with	In addition as set out above the proposed Killinarden development to the west of the site accommodating over 600 homes includes provision for a new street network which will provide vehicular, pedestrian, and cyclist connections to adjoining roads (Blessington Road/N81, Killinarden Heights, Hazelgrove, Horan's Lane/Killinarden Road) with junction improvements, additional active travel facilities, and partial pedestrianisation of Horan's Lane/Killinarden Road. It is considered that these improvements will serve the wider area including the proposed lands and will facilitate the potential for improved bus services which will also serve the subject sites. The submission from the landowner / developer is noted and the transport assessment contained therein. It is considered that these matters will be dealt with and considered in detail by the Planning Authority as part of the SLO requirement for a Transport and Traffic Assessment. *Public Transport* The observations from the NTA in relation to the site not currently acting as priority site from a transport accessibility point of view and in the context of the overall Variation is noted. As outlined above, the improvements to the road network incorporated into the Killinarden development will facilitate improvements to bus services. It is noted that the current bus services 77A (Ringsend to Citywest) and 65B provide links to Tallaght Square running along Kiltipper Heights with a bus stop at Elder Heath Rise approximately 600m from the proposed lands providing access to multi directional public transport routes. This facilitates links to the Tallaght Luas Red Line allowing for further connections towards the city centre. The Planning Authority

proximate access to a wide range of services and facilities.	will continue to liaise with the NTA to deliver on improved bus services throughout the county including where required by population growth. *Active Travel* Killinarden Park Greenway project would also incentivise green active travel routes in the area and any potential residential development at the subject site. Similarly, the proposed Dodder Greenway project would further promote active travel in the area. The Kiltipper Park section of the greenway includes walking and cycling paths improvements to the area. These projects and bus connection improvements would help to promote alternative modes of sustainable travel and help reduce car reliance on the local road network. The Transport and Traffic Assessment required by CS7 SLO8 will include an assessment of measures to promote walking and cycling. **Environmental Impacts** *Hedgerows* As outlined in the submissions, it is recognised that there are a number of hedgerows on site with the north-south hedgerow representing the townland boundary of Oldbawn-Killinarden. This was referenced in the SEA supporting the Variation No. 2, whereby it was noted that the hedgerows that run north south appear robust and represent an important local feature whilst identifying the retention, enhancement and integration of these features as part of any potential future development proposal. The most westerly central hedgerow is particularly significant being a town boundary hedgerow feature. Therefore, the SLO set out as part of Amendment No. 8 looks to retain as far as possible the hedgerows and to protect the townland boundary hedgerow. CS7 SLO8 of the proposed Variation No. 2 states the following:

	- *Existing hedgerows shall be retained insofar as possible within development proposals and the north-south hedgerow representing the townland boundary of Oldbawn-Killinarden shall be protected*. Under Objective 2 of Policy NCBH5 of the County Development Plan (2022), requires that an Ecological Impact Assessment is undertaken in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals. The policies and objectives already adopted in the County Development Plan are relevant to the Variation lands alongside any new SLOs proposed within the Variation. *Air Quality* The Variation has undergone both Strategic Environmental Assessment and a Appropriate Assessment. The Natura Impact Report supporting Variation No.2 highlights that the lands are situated a distance from the nearest European Sites and the construction phase and operation phase of new residential infrastructure at this location will not have the potential to result in changes to air quality at European Sites that could result in adverse effects to their integrity and conservation status. In relation to local air quality, this is monitored by the EPA. There is an air quality monitor in Tallaght and the 2 Year Review of the County Development Plan noted that the EPA Report indicated that none of the monitoring stations in Ireland exceeded allowable limits during the previous year. South Dublin had met all its EU CAFÉ Directive legal requirements in 2022. While this data is now out of date, the EPA is continuing to monitor air quality, and the Council is not aware of any air

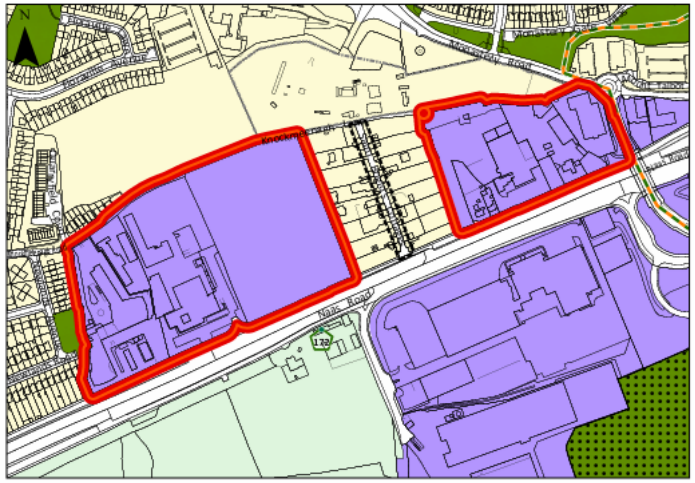
	quality issues in this area. It is also noted that the greater prevalence of electric vehicles over time will help to reduce emissions created by traffic. *Open Nature* As indicated above under 'Zoning', the open nature of much the subject lands is acknowledged, noting that there is also existing residential development within the lands to the south. The rezoning of these lands would focus residential development next to established suburban type urban areas north and east of the lands in a sustainable location. The proposed rezoning of these lands would help support the Planning Authority's ambitions to meet demands for housing delivery in the County. Green and open space would be key design requirement as part of any potential development on site to in accordance with the standards set out already in the County Development Plan. A Strategic Environmental Assessment (SEA) supported the proposed Variation. Where required, the SEA further sets out measures at site level to address issues which could impact on the Strategic Environmental Objectives of the SEA. These are set out as Specific Local Objectives (SLOs) for the lands identified to support residential development. The SLO associated with the subject lands as it relates to hedgerows is set out above. In addition, the SLO includes the need for a traffic and transport assessment. Overall, the subject site would follow the compact growth approach in line with the core principle of the National Planning Framework (2025). The site would promote sustainable development by concentrating growth next to urban boundaries and creating a new neighbourhood within close proximity to employment hubs and social and physical infrastructure.

	Flooding and Riparian Corridor The Variation was accompanied by a SFRA which included assessment of this site. The site is situated within Flood Zone C and as such, is suitable for residential development. However, the reference to historical surface water flooding prior to the nearby French drain installation is noted. The Specific Local Objective for the Kiltipper Road amendment (Amendment Ref. No. 8) requires a masterplan, any planning application which follows will be accompanied by a site-specific Flood Risk Assessment as required under the Guidelines and SuDS strategy addressing pluvial, groundwater, and surface water flood risk, and a requirement to demonstrate no increase in flood risk to adjacent residential properties. It is not considered necessary to include a SLO requesting this information These requirements are further supported by Policies IE3 and IE4 in the County Development Plan (2022). The site is not within the riparian corridor of the Dodder and as indicated above under Environmental Impacts, has been assessed for impacts through the SEA and AA. **Other Considerations** *Housing Affordability* Objective 2 of Policy H1 of the Development Plan (2022) requires that 20% of lands zoned for residential use, or for a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021.

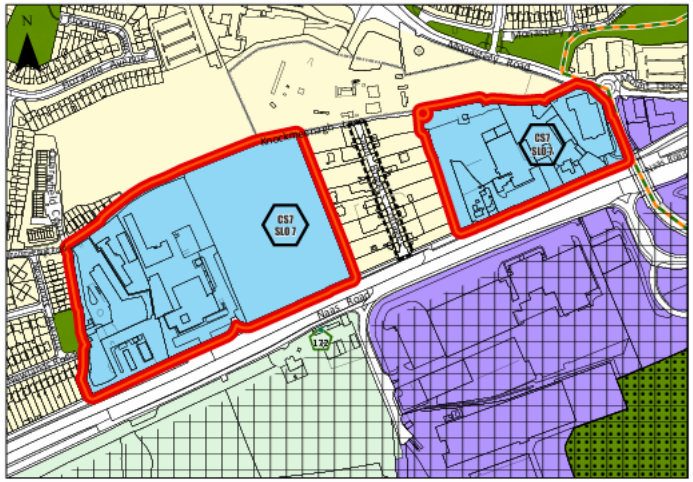
	The amendment to rezone the subject land is in response to the housing growth targets set at national planning policy level. As such, the ownership model is not a matter for a zoning objective and the Variation. *Elder Heath Development* A number of submissions have noted that the development north of the subject lands was originally granted permission with inclusion of a creche. It is noted that Kelland Homes Ltd submitted a planning application for a two-storey childcare facility under register reference SD20A/0303. The application was granted in June 2021, and the site is located north of Elder Heath development along Killinarden Heights. Any matters relating to Elder Heath on planning compliance should be raised with the Council's Enforcement Team. The process of the proposed Variation No. 2 is a separate matter focusing on the lands identified in Amendment No. 8. *Design and Scale* Objective 1 of Policy QDP2 of the County Development Plan (Neighbourhood Context) ensures that any new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located. The design and scale components of a housing development would be considered further as part of any planning application and have consideration for the scale and relationship with the established built form surrounding the subject lands. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy

	objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The subject lands are located within Dublin City and Suburbs Settlement Area, sequential to existing development and are considered appropriate to support a residential development and go towards the County's housing targets required by the Revised NPF. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to the proposed Variation No. 2 (Amendment no. 8) to the South Dublin County Development Plan 2022-2028.	

AMENDMENT NO. 9 - KNOCKMEENAGH FRAMEWORK SITE



Existing



Proposed

Submission No.

SD-C401-CDP25-809 – Cllr Trevor Gilligan PC

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-1041 – Transport Infrastructure Ireland

SD-C401-CDP25-1161 – Stephen Little and Associates

SD-C401-CDP25-1299 – M Colgan

SD-C401-CDP25-1375 – Office of the Planning Regulator

SD-C401-CDP25-1442 – Paul Gogarty TD

SD-C401-CDP25-1483 – Niall Fagan

SD-C401-CDP25-1513 – National Transport Authority

SD-C401-CDP25-1519 – Zara Keane

SD-C401-CDP25-1563 – Cllr Linda de Courcy

SD-C401-CDP25-1642 – Brid Flood Moran

SD-C401-CDP25-1652 – Margueritte Sherry	SD-C401-CDP25-1761 – Cora Sherwood

Summary	CE Response
Introduction Submissions object to proposed Amendment no. 9 of Variation No. 2 to the South Dublin County Development Plan 2022-2028 which provides for rezoning from EE to REGEN of lands at Knockmeenagh Framework Site (8.69Hs), Clondalkin on the grounds that rezoning constitutes unplanned backland development rather than sequential, plan-led growth. Submissions also describe it as premature and unsequenced, ignoring existing capacity constraints. A small number of submissions also relate to Variation No. 1 (Clondalkin Local Planning Framework) of the South Dublin County Development Plan 2022-2028. Other submissions broadly welcome the proposed rezoning with one suggesting that the change probably allows more flexibility in how the lands should be developed noting that old-style industrial units no longer make sense and there is an argument that adding residential and other uses is better planning. However, congestion on the link roads is seen as a downside. The loss of employment is noted by some.	**Context and Zoning** This response refers to Amendment no. 9 of Variation No. 2 to the South Dublin County Development Plan 2022-2028 which provides for rezoning from EE to REGEN of lands identified as Knockmeenagh Framework Site (8.69Hs), Clondalkin. The rezoning is supported by a proposed Specific Local Objective for the lands as follows: *A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners*. Submissions supporting the proposed rezoning of these lands are noted. The site is currently zoned for employment and related uses with the exception of St. Brigid's cottages (designated ACA) which is zoned for residential uses and is located between the two blocks of employment zoned land. This juxtaposition together with the N7 to the south and the associated slip road between it and the framework lands and the constrained Knockmeenagh Lane to the north has led to difficulties in

A number of submissions request the following: - That the proposed rezoning from EE to REGEN be rejected. - That Knockmeenagh Lane be designated as a protected greenway. Other submissions request it be designated as a greenbelt. - That formal TII pre-approval confirming the N7 network has capacity to support the development of this site be acquired prior to any proposed rezoning. - That independent cumulative impact studies are carried out before any consideration of rezoning of these lands. Within this context submissions broadly address the following issues; - Policy, - Density and Intensification**,** - Traffic and roads, public transport and active travel, - Heritage, - Biodiversity and green infrastructure, flooding, - Water and utility constraints, - Climate action, - Social and community infrastructure and parks and open space, - Air quality, - Impact on established uses on adjoining sites, - Other. **Policy**	developing the lands to their full potential. This can be seen by the level of vacant plots within the lands. The adopted Clondalkin Local Framework Plan (March 2026) recognised the constraints of the site, largely around access to the N7, and the lack of alternative solutions to facilitate the current employment zoning. For this reason, the Local Planning Framework (LPF) examined the potential for mixed use development to facilitate a more appropriate and efficient use of the lands. The outcome of this examination resulted in a recommendation in the form of an objective under KF1: Zoning and Transport as follows: KF1 Objective 1: *To include the Knockmeenagh Framework site lands as part of the review of zoning for new housing targets and land capacity within the County.* The proposal for rezoning from EE to REGEN is therefore included as Amendment No. 9 in the current variation process and aligns with the Clondalkin LPF. **Policy Issues** In respect of submissions expressing concern with the lack of compliance with National and Local policy attention is drawn to the following: ***National and Regional Policy*** The Knockmeenagh Framework site is located in Clondalkin which is part of a wider settlement within the Metropolitan Area Strategic Plan (MASP) defined within the Regional Spatial and Economic Strategy (RSES) as Dublin City and Suburbs. Within the County Development Plan, it is included within the neighbourhood area of Clondalkin, Clonburris and Grange Castle. The RSES 2019-2031 identifies

The proposed rezoning is fundamentally unsound and is contrary to the following; - South Dublin County Development Plan 2022–2028 (2028 (Core Strategy, Settlement, Infrastructure, Green Infrastructure chapters). - Recently adopted Clondalkin Local Planning Framework (Variation No. 1, March 2026). - The rezoning would breach policy KF1 in the LPF regarding access restrictions. - NPF/NPO 13. - Sustainable settlement and community-led planning objectives in the Revised National Planning Framework (April 2025). - TII National Roads Policy. It is stated that the proposed rezoning makes material alterations to the Clondalkin LPF. A submission indicates that the OPR submission noted delivery challenges. **Density and Intensification, Phasing** Rezoning would result in over-densification in an area currently zoned mainly for employment, not residential use. Clondalkin identified as one of the most densely populated areas in Dublin. Further intensification within a 1 km radius would exacerbate already severe development pressure. Community opposition is	Clondalkin as being located within the western suburbs Strategic Development Area along the south western corridor of the Kildare Line/DART and LUAS Red line. Clondalkin is also identified as a key level 3 service centre. In terms of key growth enablers for the City and Suburbs areas the RSES identified the promotion of compact urban growth to realise specific targets of new houses to be built within or contiguous to the existing built-up area of Dublin City and Suburbs. Furthermore, as outlined in more detail below, this Variation is being undertaken to respond to the Revised National Planning Framework (2025) and the subsequent NPF Implementation Guidelines which require Local Authorities to identify lands for rezoning to meet the revised housing targets indicated in the NPF. ***Transport Orientated Development (TOD)*** In this context National Policy Objective 97 states: '*The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development*.' The distance of the Knockmeenagh Site from the Red Cow Luas ranges from 300 metres at its closest point to circa 1000m at the furthest edge. The Red Cow Luas is also a transport hub, incorporating significant multi-directional bus services. The identification of the lands as part of the Variation is therefore in line with NPO 97 and TOD.

described as widespread and consistent across consultations. An independently conducted online poll was recorded and submitted indicating the number of respondents who were for and against the rezoning, there being 48 No and 1 Yes. It is indicated that the proposed rezoning is too dense and some of the area needs to be set aside for amenities and open space. The area is too far from the village for people to drive to use amenities and at least two areas of open space are required to serve the new population. Proposal fails to demonstrate proper phasing or sequencing of infrastructure and amenities ahead of population growth. Contravenes stated Development Plan requirements for phased delivery. **Traffic and Roads** Submission states that congestion at the N7, M50, Newlands Cross, Clondalkin Village, and Monastery Road is already severe based on local experience. It is indicated that SDCC traffic data confirms monitored junctions across the county frequently reach 100% saturation during peak hours, and SDCC's 2024 traffic-flow dataset shows persistent congestion on South Dublin's arterial routes. The M50/N7 corridor carries some of the highest inbound traffic volumes in Ireland, recorded across 43 survey	***Compliance with NPF/ NPO 13*** A submission indicates that the Variation is not compliant with National Policy Objective 13 which states as follows; '*Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity*.' The submission does not elaborate on reasons as to why there is non-compliance with NPO 13. However, as indicated above, Clondalkin is within the MASP area and within Dublin City and Suburbs. Growth in this area contributes to the overall need for Dublin to be of sufficient scale and quality to compete internationally. While the proposal to change the zoning would replace EE zoned lands with REGEN this would not be contrary to NPO13, allowing for mixed-use, including some employment and ensuring that the lands could be optimised, unlike the current situation where they are to a large degree sterilised by virtue of access issues. ***Other NPF Policy Issues*** With regard to compliance with sustainable settlement and community-led planning objectives in the Revised National Planning Framework (April 2025), the submission does not specify particular objectives. However, the policy review above demonstrates clearly that the variation complies with sustainable settlement objectives at the base of which is the creation of sustainable community-based development. Attention is drawn to National Policy Objective 12 which states; **'***Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*.'

locations, demonstrating the regional network has no spare capacity for additional development-related or future residential traffic. Knockmeenagh Lane and Road are already operating as unsafe rat-runs. Issues reported include: Vehicles travelling the wrong way, speeding, anti-social behaviour, congestion caused by proximity to the N7 and one-way systems. Road network is considered at capacity, particularly during school-run timings. Additional residential access points would worsen congestion and safety risks. Rezoning is viewed as contrary to transport integration objectives and local transport planning. Knockmeenagh lane is substandard and development would overload Monastery Road, New Road, and Newlands Cross – the area is already strained by refused SHDs applications (Dolcain ABP-309128-21; Ibis ABP-312266-21). TII's submission notes that the lands bound the N7 in the vicinity of Junction 9 of the M50 (N7/M50 Red Cow). Both the N/M7 and M50 are critical and highly trafficked routes, part of the TEN-T Core Network. TII has indicated that they positively engaged in stakeholder consultation by the County Council for the Local Transport Plan (LTP) forming part of the Clondalkin Local Planning Framework (LPF).	The requirement of the SLO as part of the proposed rezoning of the Knockmeenagh lands to deliver on the parameters of the Framework Site alongside the transport and movement plan and integration with adjoining sites will ensure that any future development will accord with NPO 12. ***County Development Plan*** In respect of submissions which suggested non -compliance with the County Development Plan it is noted that Policy CS1 (Strategic Development Areas) of the County Development Plan 2022 seeks to direct growth towards existing urban areas and public transport corridors. Any development on this site would have to show how it complies with the broader policy and objectives framework in the County Development Plan, this would include the adopted Variation no. 1 to the County Development Plan which is the Clondalkin Local Planning Framework and the associated parameters for development set out in that, including green infrastructure and built heritage. This proposed Variation relates to the zoning of the site through a process set out in Planning legislation and there is no conflict with the adopted Development Plan. ***Clondalkin Local Planning Framework (LPF)*** The Clondalkin Local Framework Plan was adopted as Variation no. 1 to the South Dublin County Development Plan 2022-2028 by the Elected Members in March 2026. The LPF implemented an objective of the County Development Plan 2022-2028. Within that process, the Knockmeenagh lands were assessed as part of the Urban Design Strategy. An analysis of the current 'EE' zoning of the site indicated

It is noted that the N/M7 and Monastery Road roundabout are currently managed as part of TII's Motorway Maintenance and Renewal Contract (MMaRC) Network Area A. TII highlight that any proposals in proximity or within these areas require prior consultation with TII and demonstration of compliance with all relevant TII Publications (Standards & Technical) requirements. Having regard to the above, previous stakeholder engagement and the Clondalkin LPF of which the Knockmeenagh lands form part, TII recommends a revision in respect of the proposed specific local objective (CS7 SLO7 page 48 of written statement) on the lands as follows: *Proposed Specific Local Objective* *A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners* ***and agreement with TII and the NTA.*** **Public Transport**	that given the constraints in the current road infrastructure and the lack of alternative solutions to facilitate the economic zoning, the framework site could not be progressed as employment lands within the LPF. However, the LPF considered whether a form of mixed-use development would facilitate a more efficient and appropriate use of the land. In this regard, design parameters for the lands were set out in the LPF to establish the urban grain and overall character of any future development, recognising that the parameters set out, based on a mixed-use zoning of the lands, could only be achieved where a separate variation on zoning was approved. The current proposed variation to the County Development Plan is a separate process. However, it acts on the following objective of the LPF; KF1 Objective 1 '*To include the Knockmeenagh Framework site lands as part of the review of zoning for new housing targets and land capacity within the County*.' In respect of submissions specifically relating to the Clondalkin LPF, for clarification, the LPF was adopted in March of 2026 as Variation No. 1 to the County Development Plan. No further changes can now be made to that document. However, many of the submissions to the current consultation address matters which are relevant to the detail of the LPF. Where provisions of the LPF provide clarification on issues raised in submissions these provisions are referred to in this response where considered appropriate. The LPF sets out a number of design principles and parameters addressing the site itself and Knockmeenagh Lane in the event of the progression of REGEN zoning on the site. These address many of the concerns raised in submissions. Other concerns raised are addressed in the wider LPF in chapters 4 'Green

Existing transport infrastructure is stated to be unable to support further residential growth without worsening congestion. No evidence has been provided to demonstrate how public transport deficiencies would be addressed prior to development. **Active Travel** Knockmeenagh Lane should be designated pedestrian / cycleway / greenway creating active travel links between Corkagh Park, Grand Canal and Kingswood with potential to achieve 51% emission reductions by 2030. The adopted Clondalkin Local Planning Framework specifically protects the lane's walls and promotes a greenway/active travel link. It is stated that policy KF3 of the Clondalkin Local Planning Framework explicitly identifies 'access restriction'. KF3 Objective 1 protection is conditional on avoiding development pressure. REGEN rezoning renders these objectives futile and ignores the development plan hierarchy where Enterprise Zoning better serves employment/ green infrastructure needs. The rezoning promotes car dependency which is contrary to active travel objective of the County Development Plan.	Infrastructure', Chapter 7 'Conservation and Built Heritage' and Chapter 8 'Urban Design'. The re-zoning of this site is not in breach of the Clondalkin LPF and, in fact, as outlined above acts on an objective of that Variation and the need to deliver on the parameters of the Knockmeenagh Framework site in the LPF are included in the SLO for this proposed Variation. Proposed Variation No. 2 does not breach Policy KF1 or the stated objectives as they relate to 'access restrictions'. They specifically seek to resolve any access or related issues in consultation with relevant stakeholders. KF1 Objective 2: *To continue to liaise with TII and NTA to work towards long-term transport solutions which would facilitate an efficient use of the lands given the context of the surrounding road infrastructure and its constrained capacity to absorb different types of development* An independently conducted online poll was recorded by way of a submission indicating the number of respondents who were for and against the rezoning, there being 48 No and 1 Yes. However, it is not known if any of the respondents made submissions through the variation process. As such, the CE cannot respond further on the results or the reasons for them. **Density and Intensification / Phasing** Having regard to the location of the site within Dublin City and Suburbs, it is considered that development at an appropriate scale and density can be accommodated on this site as part of a mixed-use zoning in this context page 112 of the LPF states as follows:

Heritage Concern about the number of heritage and historical items in close proximity to the site, including on the SBPL (SIAC) site, as well as the laneway and ACA. A submission states that the rezoning will have cultural heritage impacts, it imperils protected stone boundary walls and the monastic setting of Clondalkin, breaching conservation objectives. It ighlights the need to safeguard Knockmeenagh Lane and its historic walls. This must be prioritised above pressure from the government to rezone lands. Knockmeenagh Lane and its stone boundary walls are recognised as historic features. Rezoning would undermine the historic character and monastic setting of Clondalkin, protected under the Local Planning Framework, breaching conservation objectives. The submission also endorses MA 21 of the Clondalkin LPF which amends KF3 objective 1 'to protect the Pilgrim Route along Knockmeenagh Lane'. **Community and Social Infrastructure** The adjacent lands at Tower GAA Club present an opportunity for new tennis courts and public amenities.	'*the presence of the ACA and the different context throughout the site will determine the appropriate density within different areas of the site in accordance with the relevant guidelines*.' In respect of density KF2 Objective 2 of the Clondalkin Local Framework Plan, which as indicated above is already incorporated into the County Development Plan by way of Variation no. 1 states as follows: KF2 Objective 2: '*To ensure that any development has the necessary regard to context as provided for in South Dublin's Height and Density Guide 2022 (Appendix 10 of CDP) and, where in proximity to St. Brigid's cottages demonstrates an appropriate design response to the existing single storey cottages.'* With regard to concerns raised around phasing it is noted that the proposal is accompanied by a Specific Local Objective which requires as follows: **'***A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands...'* **Traffic and Roads** Submissions raising traffic and network capacity issues affecting access to the N7 and M50 are acknowledged. It Is noted that the GDA Transport Strategy sets out a phased programme of investment, including enhanced bus priority,

Within the 1 km radius there are insufficient schools, GP services, crèches, and community facilities. Additional residential development is deemed 'too fast, too soon', without complementary social infrastructure. The plot of land between the Louis Fitzgerald and St Brigid's Cottages is quite inaccessible. A councillor refers their motion at a Council meeting recommending this land be rezoned and used for cultural, social or sports purposes. Pedestrian access could potentially be granted from the Round Towers GAA during their opening hours. **Parks and Open Space** Knockmeenagh Lane is identified as one of the last remaining green/amenity corridors in an otherwise motorway-adjacent, built-up area. Loss of this open space would permanently reduce amenity value in the local area. **Employment** Loss of green infrastructure would reduce carbon sequestration and climate resilience, conflicting with national climate objectives. Submissions objects to loss of employment lands. Clondalkin needs more opportunities for enterprise and employment in the local area. **Biodiversity and Green Infrastructure**	expanded BusConnects corridors, and longer-term rail-based improvements and that that the lands proposed for rezoning under Variation No. 2 are located within the Metropolitan Area and within the functional catchment of existing and planned high-capacity transport corridors. While the timing of national transport projects is outside the direct control of the Council, the Development Plan provides a policy framework to align land-use zoning with the delivery of transport infrastructure, ensuring that development proposals are appropriately sequenced and assessed at planning application stage. It is Council policy that all significant development proposals are subject to detailed traffic and transport assessments, including Transport Impact Assessments (TIAs) and Road Safety Audits, where required. These assessments must demonstrate compliance with the GDA Transport Strategy's mode share targets and prioritise walking, cycling, and public transport accessibility. It is notable that the Knockmeenagh Framework Site as part of this proposed Variation is subject to Specific Local Objective CS7 SLO7 which requires the preparation of a traffic and movement plan: *'A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners.'*

The site and Knockmeenagh Lane represent a vital remaining green corridor and historic feature in this motorway-adjacent, densely built 1 km zone. The adopted Clondalkin Local Planning Framework specifically protects the lane walls and promotes a greenway / active travel link. Rezoning would erode biodiversity, recreation, and carbon sequestration functions, undermining NPF Objective 49 (climate resilience), Development Plan Chapter 9 (Green Infrastructure), and Section 28 Compact Growth Guidelines that prioritise brownfield over sensitive backland / greenfield sites. SDCC also confirms that Knockmeenagh Lane cannot be widened due to historic quarrying and ownership constraints, and must retain its historic and ecological integrity, including future greenway and biodiversity corridors. The proposal would negatively impact local biodiversity, which SDCC identifies as part of the Lane's ecological and heritage landscape. Given these constraints, the Knockmeenagh lands are far more suitable for designation as a Green Belt between the Naas Road and Clondalkin. A Green Belt would protect heritage features, safeguard biodiversity, support the planned greenway, and provide an essential landscape buffer. It would also help reduce traffic noise and improve local air quality by preserving open space and preventing further	In addition, a Local Transport Plan and movement strategy for Clondalkin was prepared in support of the Clondalkin Local Planning Framework. It focused on targeted measures to help reduce the dominance of the car, enabling safe walking and cycling, increasing connectivity to key destinations, facilitating improved public transport and infrastructure. It includes measures to improve safety around schools and improve connectivity between Clondalkin Village and its surrounding residential areas. Over time as the measures are implemented and embedded it is anticipated that walking, cycling and the use of public transport will be increased. The approach to any future development on the Knockmeenagh Framework Site Lands has a role to play in enabling that process. The design principles and parameters set out in the LPF have provided for different active travel accessibility options to and from this site to local amenities and services, including to Round Towers GAA club lands to the north. Submissions also refer to refused permissions at IBIS Hotel, Monastery Road, Clondalkin. It is noted permission for 'Build to Rent' apartments were granted on this site were granted on 8th June 2022. Notwithstanding the status of existing development or permissions in the vicinity of the Knockmeenagh site any new planning applications will be considered on their own merits at the time the application is made. The observations made by TII during the LPF / Variation No. 1 preparation process were acknowledged by the Council at that time in the specific local objective in the LPF variation: LPF - KF1 Objective 2: *To continue to liaise with TII and NTA to work towards long-term transport solutions which would facilitate an efficient use of the lands given the context of the surrounding road*

traffic-generating development—consistent with sustainable planning principles. Submission states that housing fragments GI Corridors and is contrary to contrary to Chapter 4 of the County Development Plan. The rezoning would erode biodiversity and ecological connectivity and reduce recreational value, contrary to the Clondalkin Local Planning Framework. **Flooding** The proposed rezoning increases flood risk adjacent to the N7. **Water and Utility** The area drains to Ringsend WWTP (recently upgraded but under regional pressure). No site-specific confirmation of foul drainage capacity or sequenced upgrades with Uisce Éireann has been provided for the Knockmeenagh Framework Site, breaching Objective IU2 (Infrastructure Provision) and the Variation's water/wastewater masterplan requirements. The submission from Uisce Éireann states as follows; Water: A significant trunk main network bounds the site. Local upgrades will be required to facilitate development. Sewer: Upgrades are likely to be required. An assessment of downstream pumping station would	*infrastructure and its constrained capacity to absorb different types of development.* In response to the current proposed Variation no. 2, TII recommends a revision in respect of the proposed specific local objective (CS7 SLO7, page 48 of revised written statement) on the lands as follows: From: Proposed Specific Local Objective *A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners.'* To: *"Proposed Specific Local Objective* *A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners* ***and agreement with TII and the NTA.*** The Council has no objection to the proposed revision.

need to be assessed prior to development of site, connection to this pumping station may be possible depending on the results of this assessment. **Climate** Decarbonisation is supported. The loss of green infrastructure would reduce carbon sequestration and climate resilience, conflicting with national climate objectives. **Adjoining Land Uses** *Air Quality* Air quality is poor in this area, as long as the SIAC site continues to recycle tar and pollute the air, making it dangerous for people in the buildings Submission made on behalf of SBPL (SIAC Bituminous Products Limited) which operates on adjoining lands on Knockmeenagh Lane Outlines that the location of the SIAC site at Monastery Road and its relationship to the lands subject to Knockmeenagh Framework Site. It is indicated that SPBL is not opposed to proposed rezoning from EE to REGEN and acknowledges that the variation aligns with national policy objectives on compact growth, regeneration, and sustainable settlement patterns. The submission emphasises that these new settlement patterns must be implemented in a way that reconciles regeneration goals with existing established industry.	A submission refers to the Leinster Motors site and potential parking issues which could be created by high density development. The site referred to is not within the boundary of the Knockmeenagh lands, proposed amendment no. 9. Parking is a matter which would be dealt with as part of any planning application on the Variation lands having regard to the standards set out in relevant guidelines and the County Development Plan. It is noted that the site referred to has been the subject of a separate submission requesting rezoning from EE to REGEN. This submission is addressed separately. **Public Transport** As set out in the introduction to this response the Knockmeenagh lands have potential to accommodate medium to high density development on the basis of proximity to the Red Cow Luas stop, the existence of a number of bus routes serving the area (68, 13, 60, 69, L54 and G1) and the associated bus hub at the Red Cow. Public transport issues will also be addressed as part of Transport and Movement plan of the proposed specific local objective CS7 SLO7 which accompanies the Variation. **Active Travel** In respect of active travel, the following on page 112 of the LPF is noted: *'The framework site can provide positive benefits to the context by increasing permeability towards the Luas, breaking down the block size and providing overlooking onto Knockmeenagh Lane and its associated active travel link.'* *Knockmeenagh Lane*

However, because land operations on this site involve asphalt manufacturing and associated industrial activities, the submission highlights the risk that sensitive new uses permitted under the REGEN zoning (especially housing) could perceive normal emissions—noise, odour, and machinery movement—as environmental nuisances, even though the facility operates lawfully. This could generate complaints or pressure to curtail essential industrial activity. It argues that rezoning adjoining lands without adequate protections may threaten the viability of this long-standing business (operating here for 80 years), potentially impacting employment and critical public infrastructure-servicing functions. The submission notes that SIAC's operations involve frequent heavy vehicle movements associated with asphalt production, material delivery, recycling, and plant operations It is requested that the phasing and delivery plan will address the sequencing of infrastructure, buffers, zoning transitions, and mitigation measures before any planning application is allowed. This ensures that utilities, access arrangements, and land-use strategies are coherent with SIAC's operations and avoids future conflicts. Requests environmental considerations to be addressed at the framework plan stage, ensuring	The adopted LPF includes a number of strategic permeability links through the Knockmeenagh lands to enable active travel to and from the site from the surrounding area and to public transport. Submissions address the provisions of KF3 referencing 'access restrictions' and state that KF3 Objective 1 is conditional on avoiding development pressure. Statement also that the proposed rezoning makes the inclusion of these objectives futile is noted. The support for the inclusion of KF3 objective 1 'to protect the Pilgrim Route along Knockmeenagh Lane' is also noted. The LPF provides some background and clarity here in relation to potential active travel measures and the historic nature of the lane. It acknowledges the challenges provided by potential use of the Lane for active travel and greenway development due to the historic nature of the Lane, its width and character. In this context attention is drawn to the following objective of the LPF. KF3 Objective 1: *To protect the historic integrity of Knockmeenagh Lane and associated Slí Mor while supporting sensitive solutions to its improvement as an active travel route along its existing connection from Monastery Road to New Road, providing for potential new active travel connections to and from the framework site to the Lane and further northwards*.' The purpose of this objective is to acknowledge the historic value of Knockmeenagh Lane and to ensure sensitive solutions are adopted to any potential for the development of an active travel route. The objective and text of the LPF acknowledges the challenges but also

adequate buffer zones, transitional land uses, and design strategies to prevent environmental conflict between existing industry and future development Requests the incorporation of a transport and movement plan that recognises existing heavy vehicle patterns, prevents conflict with residential traffic, and ensures transport integration with TII and NTA requirements. Appropriate transport planning is needed to prevent friction and ensure safe co-existence. Requests that the development framework or phasing plan mandated under the REGEN zoning be fully informed by detailed assessment, public consultation, and mitigation measures to avoid unintentional policy conflicts. **Other** Suggestion that the site where Leinster Motors currently sits will be problematic as if a high-density apartment complex is built, as per current guidelines, there will not be enough car parking spaces for residents. This will result in neighbouring estates and IPA centres being used as car parks.	presents the opportunity. The LPF also provides an example of how this might be achieved. Having regard to the above it is considered that the proposed rezoning promotes active travel and public transport usage while encouraging and facilitating reduced car usage while respecting the historic context of Knockmeenagh Lane. **Heritage** The subject of heritage and historic walls are addressed in detail in the adopted Clondalkin LPF. The LPF includes a range of objectives with the specific purpose of protecting and enhancing both identified and yet to be identified historic walls within the LPF area which include the Knockmeenagh Framework Lands and Knockmeenagh Lane. These are stated in CDH5 Objectives 1 to 7 and KF3 Objective 1 which states: *'To protect the historic integrity of Knockmeenagh Lane and associated Slí Mor while supporting sensitive solutions to its improvement as an active travel route along its existing connection from Monastery Road to New Road, providing for potential new active travel connections to and from the framework site to the Lane and further northwards*.' These objectives are already adopted into the County Development Plan and the current proposal to rezone the lands does not change that. It is considered that these objectives are sufficient to ensure the protection of historic boundary walls in and around the Knockmeenagh Site. **Social / Community Services and Open Space** Clondalkin caters for diverse community and social infrastructure needs, with significant public investment already evident within the

	village, recognising that additional investment will be required in the coming years to cater for its growing population. The Council continues to liaise with the Department of Education and Youth through Memorandum of Understanding (MOU) to ensure sufficient educational facilities are provided across the County. The following objectives of the LPF are noted: CHE1 Objective 1 *'To support the expansion and enhancement of existing community facilities and / or the provision of new community facilities as the population grows to meet the needs of current and future residents, where required.'* CHE5 Objective 2 *'To ensure the provision of recreational facilities based on an assessment of need and agreed with South Dublin's Public Realm section as an integral part of any development on larger framework or other sites'* The submission requesting the rezoning of part of the lands located between St Bridget's cottages and the Louis Fitzgerald Hotel for social, cultural or sports purposes is noted. The proposed rezoning to mixed-use would facilitate parts of the lands being considered for social, cultural or sports purposes, supported by the objective outlined above. It is notable that the contextual analysis and design principles for the lands within the LPF indicated how a new central open space should be provided within mixed use development. *'The framework site should provide for a new central open space, which is much needed in this part of Clondalkin. The existing active link at Knockmeenagh will also benefit from improved overlooking'*

	A submission stating that the adjacent lands at Tower GAA Club present an opportunity for new tennis courts and public amenities appears to have been made in the context of this potential being available notwithstanding the proposed variation. It is noted that these lands are in the ownership of the GAA. As such, this is not something within the scope of the Variation. However, active travel links are indicated in the LPF to Round Towers lands. **Employment** Concern in relation to loss of employment potential should these lands be rezoned are acknowledged. It is noted that the REGEN zoning does provide for the regeneration of land around both enterprise and residential uses providing an opportunity for the positive co-existence of both. However, as indicated above, the current EE zoning has not delivered successfully on employment in large part because of the access constraints on the site. The greenfield lands to the east of St. Brigid's Cottages have not been able to come forward and the existing zoned EE lands to the east of the cottages have considerable vacancy. **Biodiversity and Green Infrastructure** Concerns raised around risks to Biodiversity and Green Infrastructure in submissions are noted. Noting also the contention that the rezoning is contrary to the provisions of Chapter 4 of the County Development Plan and the LPF as it relates to Green Infrastructure (chapter 4 of the LPF, Appendix 13 to the County Development Plan). Here again the LPF provides some clarity and detail. The Urban Design Strategy for the LPF is built around the key elements of Urban Structure, Built Heritage, Movement and Green Infrastructure. The LPF provides for the consolidation and enhancement of green infrastructure across the plan

	area. It identifies the Knockmeenagh Framework site as has having a key role to play in delivering GI links across the LPF area. The potential for green infrastructure enhancement presented by the Knockmeenagh Framework Site is set out on page 32 of the LPF. *'The Knockmeenagh Framework Site lands also present a unique opportunity to provide strong links through the site and potentially towards residential green areas to the north, connecting with green elements along Monastery Road and Knockmeenagh Lane and Road to Laurel Park and towards Clondalkin Village'* Section G13 (page 32) includes objectives for the enhancement of GI links across the LPF area. This section identifies a potential Station to Station GI Link deliverable in the long term *'from the Luas Station at the Red Cow through the potential framework lands at Knockmeenagh. This route runs westward towards and through the village along Monastery Road or Knockmeenagh Lane/Road and onwards along Tower Road across Old Nangor Road, through the Ninth Lock Road Framework Site and northward onward to Dunawley Park and adjoining residential areas.'* Nothing in the proposed rezoning of these lands would negate the already adopted GI objectives in the County Development Plan including those in the LPF. **Flooding** The proposed Variation is supported by a Strategic Flood Risk Assessment which has identified no flooding potential on these lands. In addition, as required under the Flood Risk Guidelines, any future

	development on the lands will include a site-specific assessment of potential flood risk. **Water and Utility** Submissions referencing shortfall in information around water and utility services managed by Uisce Éireann. Noted that the sources of some objectives mentioned in submissions for example IU2 (Infrastructure Provision) are not clearly referenced. It is likely that this is reference to national initiatives aimed at enhancing public infrastructure in Ireland. One of these being Uisce Éireann's 'Water Services Strategic Plan'. Uisce Éireann were consulted as part of the preparation process of the Variation and have made a submission to the proposed Variation. In respect of water supply the submission notes a significant trunk main bounds the site and that local upgrades will be required to facilitate development. Upgrades to the sewer network are also likely to be required but this will need to be confirmed through assessment of the existing downstream pumping station. Both issues can be addressed through the planning application process. Uisce Éireann were consulted submissions made during the public consultation and advised that the Ringsend upgrade was recently completed and has capacity. Should network upgrades be required they can be developer led. The statement that the rezoning is contrary to the variations water/wastewater masterplan requirement is noted. It is unclear what is referred to here but the submission and further response from UÉ

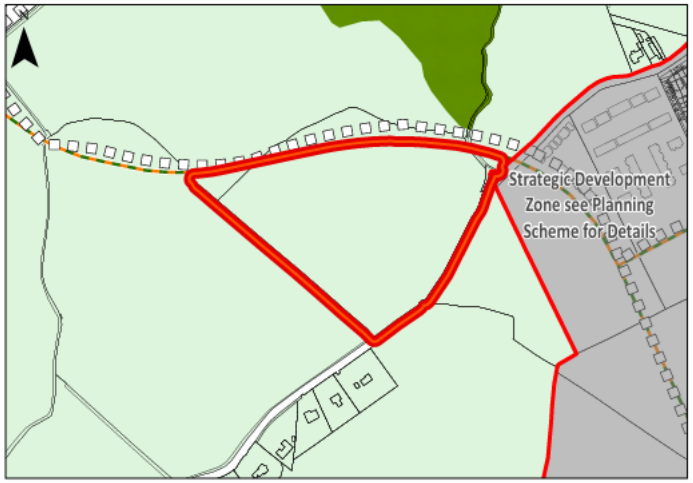
	indicates that any local upgrades could deal with requirements for water and wastewater. **Climate Action** The County Development Plan 2022-2028 incorporates climate action throughout, the Clondalkin LPF replicates this approach. The wider Clondalkin area has been designated as a 'Decarbonisation Zone' with a range of related actions across all sectors including Council owned buildings. The LPF also provides detail in this regard including a range of objectives which address climate action issues. CA4 Objective 2 states as follows: *'Support renewable energy as part of new development and through retrofitting of existing buildings, including through an increase in solar panels, heat pumps, and micro wind energy where feasible.'* The proposed Variation for rezoning does not negate the requirement to take account of existing policy and objectives of the County Development Plan on climate change is therefore considered to be in line with national and local climate action policy. **Adjoining Land Uses** *Air Pollution* Submissions referencing the potential for air pollution from the adjoining SIAC site are noted. In this context attention is drawn to the Proposed Specific Local Objective CS7 SLO7 for the lands which requires integration with adjoining land uses through which these issues would be addressed: '*A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning*

	authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners.' The submission on behalf of SIAC is also acknowledged and attention is again drawn to CS7 SLO7 which includes a requirement on the need to ensure integration with adjoining land uses and for liaison with landowners. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units.

	Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity.

	Conclusion South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. It is considered that the site is ideally situated to the delivery of sustainable, transit-oriented development in line with national and regional policy objectives. The OPRs submission is also noted, stating 'With regard to ensuring an adequate supply of residential zoned land, the Office strongly welcomes the proposal to zone additional lands for residential use, identified as amendments no.1 to no.16 of the proposed Variation, which are vital to enable the delivery of housing within the current plan period, consistent with Policy and Objective 1 and 2 of the Housing Growth Guidelines'. In this regard the OPR has made one recommendation which is to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no. 16 of the proposed Variation.
CE Recommendation It is recommended that the proposed Variation (Amendment no. 9) be adopted with the following amendment to the proposed Specific Local Objective CS7 SLO7. *CS7 SLO7* *A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework and include a transport and movement plan, in liaison with TII, NTA and landowners* ***and agreement with TII and the NTA.***	

AMENDMENT NO. 10 - STONEWALL



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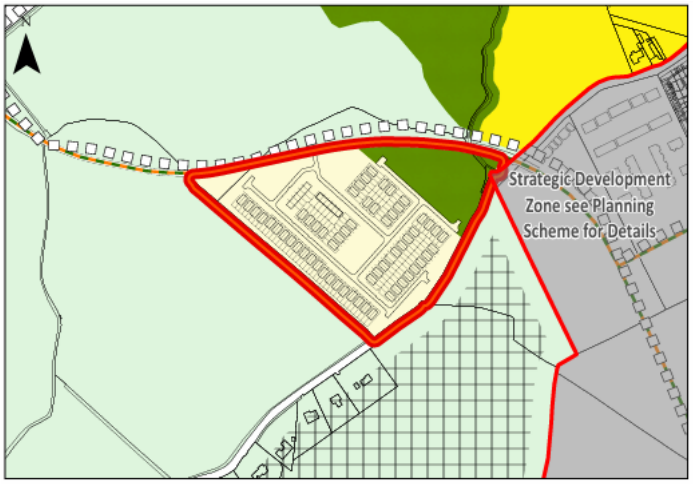


Proposed

Submission No.

SD-C401-CDP25-164 – Rory Thynne

SD-C401-CDP25-273 – Patrick Bradshaw

SD-C401-CDP25-282 – John Kelly

SD-C401-CDP25-330 – Sarah McDermott

SD-C401-CDP25-388 – Robert Maloney

SD-C401-CDP25-414 – niall oneill

SD-C401-CDP25-428 – Bernadette Boylan

SD-C401-CDP25-431 – Lorna Quinn

SD-C401-CDP25-469 – Patricia Graham

SD-C401-CDP25-684 – Davina Monahan

SD-C401-CDP25-776 – Mary Whittle

SD-C401-CDP25-847 – Grace Lavery O'Reilly

SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-976 – Matt Lavery-O'Reilly	SD-C401-CDP25-1077 – AIMEE AHERN
SD-C401-CDP25-1159 – David Whittle	SD-C401-CDP25-1174 – Aine Maguire	SD-C401-CDP25-1193 – Priya Parameswaran
SD-C401-CDP25-1260 – David Kinsella	SD-C401-CDP25-1270 – Marcel Notenboom	SD-C401-CDP25-1271 – Karen Kinsella
SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1375 – Office of the Planning Regulator
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1597 – Cllr Vicki Casserly
SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1727 – Ajai Govind Govindan

Summary	CE Response
Zoning Several Submissions outline the reasons why a land parcel (c. 5.53ha.) located at Stonewall, Adamstown (currently zoned Objective 'RU'), should not be considered as part of the proposed variation to the SDCC County Development Plan. A key concern raised is that the subject lands accommodate modular housing delivered under emergency legislative provisions, and that temporary, unique development should not justify a residential zoning designation.	This amendment is in relation to the designation of lands at Stonewall (noting that it is also referred to as Stonewell), Adamstown that are currently zoned Objective 'RU' to 'RES' and 'OS' under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028. The land parcel in question is c. 5.53ha. **Context** The site contains 128 modular units which were constructed as part of exempt emergency accommodation by the State under Statutory Instrument No. 306/2022 (S.I. No. 306/2022).

A number of submissions detail that emergency accommodation is inherently short-term in nature, and that designation of the lands in question as 'RES' and 'OS' would set an inappropriate precedent. Other submissions detail that the subject lands should remain 'RU' or be designated 'OS' in its entirety, citing their perceived role as a buffer between settlements, the open character of the area, and protection of green space. **Traffic and Roads** Several submissions highlight congestion on the Celbridge Link Road, Newcastle Road and surrounding network. It is contended that the road network is already operating at capacity and that additional residential development would worsen existing traffic conditions. **Public Transport** Several submissions state that the public transport serving the immediate area is overcrowded and unreliable, and that additional development should not proceed without improvements to public transport provision. **Parking** Several submissions detail that new developments within the Adamstown area, provide inadequate parking provision, resulting in overspill parking on local roads, footpaths and cycle lanes.	While standard planning permission requirements were waived under the exemption, projects still had to adhere to the relevant environmental assessments under Sections 181A to 181C of the Planning and Development Act. In addition, as part of the Variation process, the site has been subject to strategic environmental assessment, appropriate assessment and strategic flood risk assessment and the relevant reports attached as part of the public consultation. While the homes on the lands are of modular construction they have an estimated minimum lifespan of 60 years, comparable to any other built accommodation. They are compliant with the building regulations. As such, and given the level of investment into the lands, including landscaping, open space and SuDS features, alongside utilities it is considered appropriate to amend the zoning to reflect their established nature. **Location of Lands** Notwithstanding that the lands were originally identified for emergency accommodation, it is considered that the subject lands are in close proximity to the Adamstown Strategic Development Zone (SDZ), and are a reasonable extension to its coherent urban framework that enables consistency for compact, Transport Oriented Development (TOD), ensuring key NPOs/NSOs of the NPF are delivered, such as NSO1 and NPO10. It is also noted that in time, should the amendments relating to Tubber Lane North and the long-term SDA at Adamstown West be adopted, the subject lands will be immediately contiguous to, and form part of, further planned growth and associated infrastructure and community / social facilities.

A submission details that stronger enforcement is required, before additional development. **Overdevelopment** A number of submissions, state that the wider Lucan and Adamstown area has already experienced substantial residential development, particularly through the Adamstown SDZ and Clonburris SDZ. Several submissions contend that designating the lands for residential development would exacerbate cumulative pressures on transport infrastructure, services and local amenities. **Water and Wastewater** A submission was received from Uisce Éireann (UÉ), formerly Irish Water (IW), In relation to the Stonewall site UÉ have indicated that it is serviced. **Flood Zone, Surface Water & SFRA** Several submissions raise concern that the subject lands are prone to flooding (in particular the area proposed to be designated 'OS'), detailing that lands with potential flood constraints should not proceed for residential zoning. A number of submissions explicitly request that a flood risk assessment be completed or updated prior to any rezoning designations.	Overall, when considered against the criteria set out in the variation process and the capacity audit, in addition to key principles set out in the NPF, as well as the MASP, and the fact that the lands are already developed and occupied, it is considered appropriate that the lands be progressed as part of the variation. **Traffic and Roads** Having regard to the established nature of the site, it is considered that the subject lands, at this moment in time, do not generate new trip demand beyond its existing condition. The built-out development at Stonewall is already accommodated within the local and wider strategic road network of the Adamstown SDZ. Furthermore, should any future proposals on the site arise, they would remain subject to a Transport and Traffic Assessment through the development management process and be required to meet the appropriate County Development Plan Policies and Objectives. **Public Transport** The subject lands are approximately 600m to the C4, C6, X27 and X28 services on the Lucan-Celbridge Road (R403). Pedestrian traffic lights facilitate crossing to the Dublin bound route and both the inbound and outbound routes have relocated the bus stops with associated footpaths to accommodate access from the Celbridge Link Road. Similarly, the closest bus stop at Shackleton Drive, which serves the C2 route, is approximately 600m from the entrance to Stonewell. Having regard to the choice of bus services, it considered that the development is accessible to and already using the high-capacity public

Schools A submission states that additional housing at Stonewall would exacerbate capacity constraints at existing primary and secondary schools. The submission requests that new school provision is provided, prior to the commencement of housing development. **Community and Social Facilities** A number of submissions raise concern regarding the capacity of community and social infrastructure, including GP services, healthcare provision and recreational amenities. Several submissions requests that a Social Infrastructure Audit be undertaken, to determine if there is adequate provision of the aforementioned above.	transport in the area and that there is no detrimental impact to the public transport services. **Parking** The proposed amendment does not alter the existing development, nor the number of units on site, and therefore does not increase parking demand. It is noted that car parking spaces are provided for the units within the site and there is no impact on the surrounding areas. Furthermore, issues pertaining to enforcement of parking standards, as set out in the CDP (Section 7.10 and 12.7.4), are addressed through the development management and enforcement processes rather than through proposed zoning amendments to the CDP. **Overdevelopment** As indicated earlier in the CE response, the accommodation was provided following the utilisation of a statutory instrument, and appropriate environmental assessments were also considered as part of that process. The proposed recognition of the established use on the lands through the regularisation of the zoning would not constitute overdevelopment because the scale and intensity of development has already been demonstrated, in practice, to be appropriate to the site and its context: the scheme is adjacent to an established built-up area, is served by existing infrastructure, and benefits from walkable / cycle access to public transport, schools, and local retail, thereby embedding it within the functioning settlement rather than overburdening it. The layout, density, and environmental measures show that the site has the physical and infrastructural capacity to accommodate the

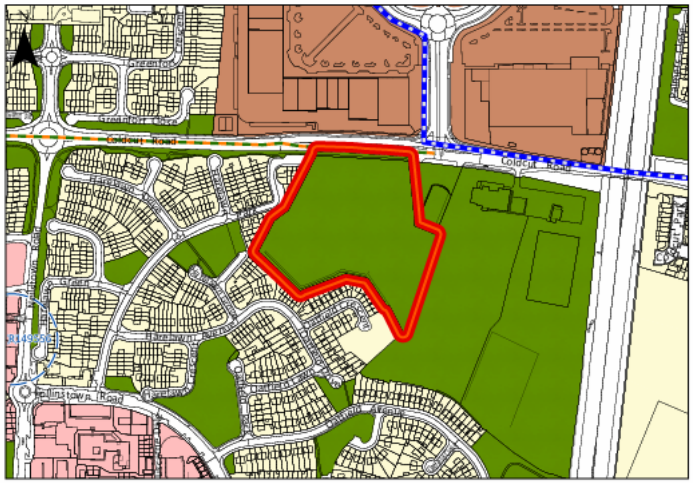
	development without loss of residential amenity, visual harm, or infrastructural strain. Importantly, the scheme has operated successfully as accommodation since its completion, providing clear empirical evidence that traffic generation, service demand, and environmental impacts are modest and well absorbed by the surrounding area. **Water and Wastewater** UÉ have indicated that Stonewall is serviced for water and wastewater. **Flood Zone, Surface Water & SFRA** The concerns raised in submissions regarding flood risk, surface water management and the implications of Flood Zones A and B, including requests of a Strategic Flood Risk Assessment (SFRA) are noted. An SFRA was undertaken for the site and published as part of the public consultation. Following concerns raised by the submissions, SDCC asked the flood risk consultants to review the concerns raised. Their review stated the following: *The SFRA confirms that Site 134 (Stonewall) contains a local stream/watercourse running along its eastern boundary, which continues past the Celbridge Link Road via a culvert. The eastern portion of the site falls within the HEFS zones.* *In direct response to this flood risk, the proposed variation divides the site into two sections: the western portion is zoned residential (outside the flood zones), and the eastern portion, which overlaps with the HEFS extents, is designated as open space in accordance with GI3 Objective 3 for riparian buffer zones. The submitter's concern is therefore partially borne out by the SFRA findings.*

	The eastern portion is within the HEFS extents and has been treated accordingly. The residential zoning applies only to the flood free western portion. No Justification Test is required. Flood risk for any future development must be assessed in accordance with Section 4.3 of the SFRA. As indicated in the Flood Risk consultant's report, where the High End Flooding Scenario is identified within the site, it is already contained within the existing open space on the site and reflected in the proposed rezoning of this from RU to OS. No residential development is within the identified flood zones. It is therefore considered, given the existing use on site, the location of open space on the identified flood zone within the site and the conclusion of the SFRA, that the proposed site is acceptable in terms of zoning proposals. **Schools** The lands are already developed and in residential use with school going children already accommodated within the school catchment area. The proposed amendment (No. 10), does not seek to introduce additional residential development, increase density and/or alter the scale or nature of development at the subject lands. In terms of new school delivery, the Adamstown SDZ scheme has provided schools through its phasing programme. To date, one post primary school and two primary schools have been delivered, each being a 32 classroom school, over the minimum requirement of 16 classroom schools set out in the scheme.

	Additional capacity will be delivered on the remaining two school sites which have planning permission at Aderrig (SDZ25A/0001W - 32-classroom school) and at Tandy's Lane (SDZ24A/0013W - 32 Classroom school). The Tandy's Lane school site is at Stage 3 (Tender Stage) in Q1 2026 under the Department of Education and Youth's First Tranche of NDP Rollout. Should further lands be zoned in the area as part of the Variation, facilitating a new population, the need for further schools in addition to those already committed to as part of Adamstown SDZ and school expansions in Lucan, will be examined and facilitated as required. **Community and Social Facilities** The proposed amendment (No. 10), does not seek to introduce additional residential development, increase density and/or alter the scale or nature of development at the subject lands. It is noted that concerns around community and social facilities relate primarily to future growth, it is considered that subject lands are integrated into the immediate Adamstown area, which benefits from social infrastructure planned and delivered as part of the SDZ (as amended), including the wider metropolitan area. Accordingly, while the concerns raised in submissions are noted, it is considered that the proposed zoning regularises an existing situation of modest growth and does not add a new burden on community or social facilities. **Conclusion** The lands subject to this proposed amendment to the County Development Plan are already built and occupied and serviced by the

	necessary infrastructure to ensure their sustainability. They are adjacent to Adamstown SDZ and to existing amenities, in proximity to high capacity public transport and adequately served by local schools. It is considered that the proposed amendment to the zoning would more accurately reflect the actual situation on the ground and given the above, is appropriate. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to Variation No. 2 (Amendment no. 10) of the South Dublin County Development Plan 2022-2028.	

AMENDMENT NO. 11 - COLDCUT ROAD



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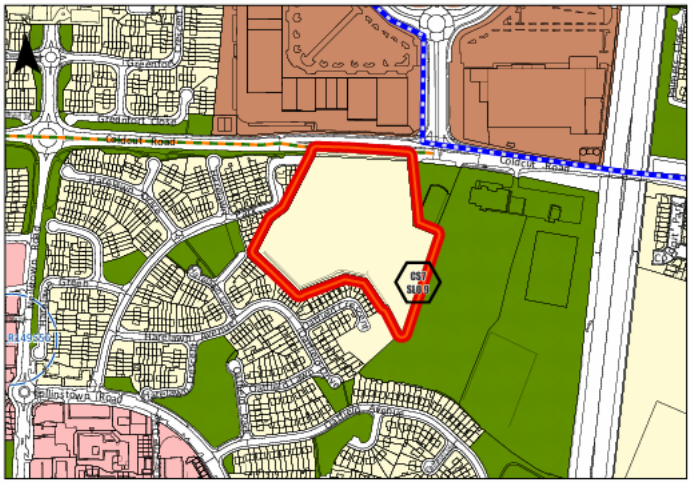


Proposed

Submission No.

SD-C401-CDP25-446 – Fiachra Brennan

SD-C401-CDP25-458 – Josephine Lawless

SD-C401-CDP25-689 – Gary Hancox

SD-C401-CDP25-853 – Patrick Healy

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-1000 – Stacey McGrath

SD-C401-CDP25-1014 – Ken Keogh Keogh

SD-C401-CDP25-1145 – Grainne Quinn

SD-C401-CDP25-1189 – Dermot Rowe

SD-C401-CDP25-1204 – Phelim Seery

SD-C401-CDP25-1207 – The Workers' Party

SD-C401-CDP25-1302 – Martina Quinlan Byrne

SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board
SD-C401-CDP25-1452 – Beldare Homes	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1666 – Shane Moynihan TD
SD-C401-CDP25-1725 – Department of Education and Youth		

Issue Summary	CE Response
Zoning Most submissions object to the proposed rezoning on the grounds that the land should remain as open space. It is argued that a negative precedence will be set as green space will be reduced. The development of a masterplan is needed on Coldcut lands. The view is expressed that the council should CPO the land for sporting development. It is indicated that the area needs green spaces and sports areas as there is already a high housing density in the area. This land should be kept as a public amenity otherwise there will be issues in the future for families, young people and the wider community. It is put forward that none of this land should be rezoned residential. The proposed site, incorporating the old GAA pitch beside Harelawn, is part of a larger area owned collectively by bus drivers but understood to be sale agreed with a developer. The	**Introduction and Zoning** Amendment No. 11 Coldcut Road proposes a change of zoning from 'OS' To preserve and provide for open space and recreational amenities to 'RES' To protect/or improve residential amenity. The proposed rezoning is accompanied by a Specific Local Objective CS7 SLO9 which states: *In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social Club, details as to how public access, permeability and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority.* The proposed lands for rezoning form part of a wider area currently zoned Open Space (OS) which was used by Dublin Bus Services Sports and Social Club. The proposed lands comprise approximately 3 hectares of within the overall 10 hectares of Open Space zoning located south of the Coldcut Road (R833) and the Liffey Valley Shopping Centre. The lands subject to the rezoning are currently unused and overgrown. The lands were formerly used as a playing pitch in association with the wider club which includes a clubhouse with bar

campus includes a lot of amenity space still used, including an underdeveloped clubhouse. While it is privately owned, it has always served as a community amenity. A submission states that SDCC made a bid for these lands but was unsuccessful. It notes that if the Council had bought the site it, is likely that it would have built affordable housing on part of it, as social housing can be placed on an amenity zoned land but not private residential. In this event, the level of amenity space retained would likely be higher than under a private owner. The wider community interest is likely best served by the site remaining open space or amenity under current zoning designation rather than new residential. If the Liffey Valley housing zoning gets permission than this site is hugely important to ensure access to amenities for existing and new residents in the North Clondalkin area. **Infrastructure, Sports and Community Facilities** It is stated that local authorities have little care for the provision of facilities such as schools and healthcare, as well as traffic infrastructure. The area has seen significant residential development in recent years. The level of development has not been matched by adequate infrastructure, community facilities, public leisure or amenities for the growing population. In particular, there is serious lack of recreational facilities for children and young people.	(currently closed), pitch and putt, and numerous pitches (which are still available for rent to the public on the social clubs website) on the lands to be retained as Open Space. It is noted that planning permission was granted by An Bord Pleanála in February 2025 (PL06S.320909) for a change of use of the club function room to restaurant use. Submissions focus on the importance of the site and overall Dublin Bus Services Sports and Social Club lands as a sports and recreational facility for the members of the club and local community. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units.

The Department of Education and Youth's submission to the proposed Variation identified school need for the wider Lucan, Adamstown, Palmerstown neighbourhood area but linked this more to growth in Lucan. It should be noted that further engagement with the Department was undertaken following their submission and this is referenced in the CE Response opposite. It is indicated that the site should be kept as a public amenity otherwise there will be issues in the future for families, young people and the wider community. It is submitted that the subject lands should be retained as a multi-use sports and outdoor area. North Clondalkin urgently needs more sports and recreational facilities, not fewer; rezoning a sports green for housing would further reduce vital community amenities. The site's dereliction was deliberately engineered to push for rezoning and should not justify the loss of a designated community sports asset. Alongside other proposed rezonings, removing this facility would place additional strain on already limited community services in an area experiencing significant anti-social behaviour. A submission states that they believe that this is knee jerk reaction to a housing crisis which involves the rezoning of land that has been recreational land	Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has identified lands which have been carefully evaluated through a criteria-based approach to best meet the housing shortfall for 2028 with built-in additional capacity.

since 1967. They understand that we do need more housing, but questions at what cost. For all the development going on in Clondalkin, more recreational land is needed. The submission states this would be a golden opportunity for the council to buy this for the community. Dublin City Services Sports and Social Club, also known as the Coldcut Club, represents an important sporting resource for the people of North Clondalkin, Palmerstown, and neighbouring areas in this part of Dublin. Rather than aiming to secure and expand it, South Dublin County Council is attempting to rezone part of the site from Open Space to Residential. The Council should include or revisit the need for additional or improved sports facilities on the site - Rather than doing away with it, this pitch should be redeveloped and brought back into use. A running track and athletics area could also be installed here. There are countless clubs across various sports codes in our communities who would benefit from this. As Open Space, it could also facilitate a community centre and allotments. Coldcut has always been used for recreational purposes, so building housing will be a huge loss as a resource in the area, including for several disadvantaged communities. It goes on to say that the provision of sporting activities is proven to have a	**Zoning and the Subject Lands** The lands at Coldcut Road were considered suitable to support strategic housing development. It was concluded through this process that residential development could be supported on these lands in terms of social and physical infrastructure, access to parks and sustainable planning objectives. This approach considers current and proposed developments in the area. In order to meet the housing growth targets the subject lands are considered a suitable opportunity to support residential development encouraging the objectives of compact settlements focusing development in metropolitan areas in a sustainable manner. The inclusion of the accompanying Proposed Specific Local Objective CS7 SLO9, outlined above, will enable the delivery of the remainder of the wider site for recreational and amenity purposes to serve the wider community. **Overdevelopment** Concerns were expressed in submissions around the level of development not being matched by adequate infrastructure, community facilities or amenities. However, significant investment has been made in recent years in transport infrastructure in the area, with new and improved cycling infrastructure and a bus hub at Liffey Valley which will continue to increase the level of multi-directional bus services as BusConnects rolls out. The site is also located adjacent to the Liffey Valley Shopping Centre providing a range of retail and recreational facilities. Community and sports infrastructure is discussed below.

positive impact on young people's lives providing them with skills and social behaviours. It is submitted that these lands should be retained as open green space and connected with Collinstown Park, providing essential recreational and environmental benefits for residents of North Clondalkin and surrounding areas. **Traffic and Roads** It is submitted that local authorities have little care for the provision of traffic infrastructure. It is indicated that this area is busier than ever with the number of houses being built and Coldcut is in the corner of a busy road. It is requested that there should be a stop to building homes in this already built-up area. **Public Transport** The NTA submission notes that the site at Coldcut will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. The site is served by a variety of radial and orbital services. **Utilities** *Uisce Éireann* The UÉ submission notes that the site is already serviced but notes that wayleaves and / or diversion agreements will be needed. It also notes that local upgrades may be required. The submission notes that the sewer network capacity at M50 crossing &	**Community Infrastructure** The lands are in close proximity to the new North Clondalkin Library at Rowlagh and to a number of community centres in the area. The lands are also very accessible to Ballyfermot Primary Care Centre which lies further to the east along the Coldcut Road, R833 and local GP practices. The Hermitage Medical Clinic is also close by. There are a range of schools also located in the area: – St Kevin's Community College – St Bernadette's Junior and Senior Schools – Collinstown Community College – Palmerstown Community College – Pobalscoile Iosolde, Palmerstown – King's Hospital School, Palmerstown Following the submission to the proposed Variation by the Department of Education and Youth, the Planning Authority engaged further with them towards identifying a more detailed analysis of school requirements. Following this, the Department of Education and Youth indicated that, should the new populations facilitated by the rezonings materialise at Liffey Valley and Coldcut, there will be a need to reserve a primary school site (24-32 classrooms depending on population growth). For secondary schools, it is likely that existing schools in the vicinity will need to expand with the possible requirement of a new secondary school, should there be further increases in population above that projected in the current re-zoning. Having regard to the above it is considered that the Specific Local Objective attached to the rezoning of the lands should include an additional requirement, to be included as point b as follows:

downstream (past Cherry Orchard) could be impacted. *Electricity* The ESB acknowledges the aims of the proposed Variation No.2 of the Development Plan (2022) and notes the increased reliance on electricity, combined with climate change impacts are driving the need to enhance the reliability and resilience of the network. The ESB Networks are firmly committed in expanding electricity network capacity across Ireland to meet the demands of a growing population and accelerated housing development and the organisation proposes substantial infrastructure investments. ESB identifies several network reinforcement initiatives that are currently underway or being evaluated through South Dublin to address substation capacity constraints and main maintain security of supply. **Adjoining Properties** Submission states that their house backs onto the pitch and putt course and that they do not want high rise apartments at houses there instead of a sports ground. **Submission on behalf of Beldare Homes** The subject lands are considered appropriate for residential zoning, aligning with the requirements and assessments in determining sequential and	CS7 SLO9: *b) Having regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development.* There are a number of creches located in the area; Ready, Steady Play, Fonthill Road**,** First Steps, Rowlagh**,** Cherry Orchard Community Childcare Services and Quarryvale Creche. Furthermore, the requirement for creche facilities as part of development is assessed during the planning application process having regard to Childcare Guidelines. **Parks and Open Space** Collinstown Park immediately adjoins the area of open space proposed to be retained in this zoning. The Park includes play areas and dog runs as well as supporting active recreation in terms of pitches. Collinstown Park Sports Complex adjacent to the park and to Collinstown Community College offers various sports facilities and activities including a Cycling Inclusion Centre of Excellence. Cherry Orchard Football Club has an astro pitch within easy reach off the R833. Furthermore, the inclusion of CS7 SLO9 will ensure that the open space lands provide public access with links from new residential zoning to improved recreational facilities as part of or prior to development, as stated in the SLO: *In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social*

appropriate lands for rezoning. Reasons are outlined below. • Sequential Location: Lands are within the existing built-up area of Clondalkin and adjoin established residential development, representing a logical consolidation of the urban footprint. • Serviced Urban Lands: The site is located along Coldcut Road within an area already supported by existing road, utilities, and community infrastructure. • Accessible Location: Proximity to key transport corridors, including Coldcut Road and the M50, together with existing and planned public transport services. • Integration with Existing Communities: The lands are directly bounded by established residential neighbourhoods, allowing development to integrate with the existing urban structure. • Infrastructure Capacity: The location allows efficient use of existing services and infrastructure while accommodating appropriate access and servicing upgrades where required. • Compact Growth: Rezoning would support national and regional planning objectives by facilitating sustainable residential development on well-located lands within the urban area.	*Club, details as to how public access, permeability and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority.* **Transport** The Revised National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) and the South Dublin County Development Plan 2022–2028 set out ambitions for a long-term approach to transport and land-use integration focusing a shift away from car dependency whilst focusing growth along good public transport routes with access to key active travel infrastructure. Policy SM1 (Overarching – Transport and Movement) of the Development Plan 2022-2028 promotes ease of movement by integrating sustainable land-use planning with a high-quality sustainable transport and movement network. The subject lands have access to good public transport. The National Transport Authority (NTA) has indicated that this area is well served by public transport and that the area will benefit further from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. The Liffey Valley to City Centre is the first of the NTA core bus corridor schemes to be rolled out and begins at Fonthill Road, with the route then continuing south towards Coldcut road, through Ballyfermot village and onto Sarsfield Road. It is also noted that Liffey Valley, as part of the BusConnects scheme, has now delivered on the bus interchange with associated changes to car parking and traffic movement within the area surrounding the retail centre. The Lucan to City Centre BusConnects scheme along the N4 is advancing with Notice to Treat issued to landowners in April 2026.

The submission gives 4 options for providing a suitable access to these lands. 1. New access junction directly from site onto Coldcut Road. while technically feasible, this option may require further traffic analysis and engagement with the planning authority and transport authorities to confirm its suitability. 2. A further option involves securing access through adjoining lands that are already served by an established junction onto Coldcut Road. This option would depend on the co-operation of third-party landowners 3. A potential option exists to provide link routes through the existing residential areas to the west, including connections via Harelawn Park and Oatfield Crescent. However, these routes currently function as cul-de- sac residential streets, and their use as access routes may raise concerns from existing residents regarding traffic generation and neighbourhood character. 4. The final and preferred option Involves utilising an existing junction onto Coldcut Road and providing a new internal link road to connect this access point to the development lands. This option would avoid the creation of an additional junction on Coldcut Road and instead rely on the upgrading and widening of an existing access arrangement. However, the	The Planning Authority will continue to actively liaise with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) on the planning and delivery of transport infrastructure across the County, including bus, rail and strategic road networks. This engagement includes ongoing input into the BusConnects programme, which seeks to improve bus capacity, frequency and reliability across the metropolitan area. While some submissions highlight dissatisfaction with aspects of BusConnects implementation to date, the Planning Authority notes that the programme represents an evolving network, and SDCC will continue to work with the NTA to secure enhanced bus services. The BusConnects scheme also includes for upgraded cycle and pedestrian infrastructure. In addition, the Planning Authority continues to invest in active travel infrastructure through Cycle South Dublin, for instance the Grand Canal Greenway located to the south of the lands. Continued engagement with the NTA and TII followed by the application of the Development Plan (2022) parking standards in accordance with the relevant planning guidelines and National Planning Policy Statements, will facilitate development that supports a modal shift, managing traffic impacts and moves away from car-dependent growth to the area. **Utilities** *Water and Wastewater* Uisce Eireann has indicated the following: Water Network- The site is already serviced. Wayleaves and / or diversion agreements will be needed. Local upgrades may be required.

feasibility of this approach depends on the ability to deliver a connecting road through lands that are currently designated as open space. This option would require one of the following; a) Include a specific objective in the CDP for this access to serve the 'RES' lands or b) Rezone a portion of these lands to residential thereby allowing the link road to be delivered as part of an integrated development masterplan proposal.	Sewer Network - Capacity of M50 crossing & downstream (past Cherry Orchard) could be impacted. It is considered that these issues can be addressed at planning application stage and by pre-connection engagement by the developer with Uisce Éireann. *ESB Networks* The submission from the ESB is noted and SDCC will continue to engage with ESB and Eirgrid to facilitate the infrastructure required to upgrade and expand the network to the extent possible. As part of the delivery of any development the developer will engage with the electricity provider to ensure that units can be connected in a timely fashion. **Adjoining Properties** Objection raised by adjoining property owner about having high rise apartments or houses on the site instead of a sports club are noted. Any planning application made on the proposed site will be required to address the context of the site and to satisfy the planning authority that there will not be significant adverse impact on adjoining properties. A submission has also indicated that apartments at Larkfield House breach planning. This is a matter for planning enforcement and is not something for the Variation process. **Beldare Homes** The submission from Beldare Homes welcomes the rezoning and has suggested a number of alternative options for access to the lands both within and outside the proposed residential zoning.

	It is the opinion of the Chief Executive that the proposed Coldcut lands have potential options for access in their current form. While the addition of lands to the east of the current proposal may give additional mobility access options such options may not be necessary. Demonstration of appropriate and safe access arrangements including form, location and design will be addressed at planning application stage and will be informed by: • Traffic and Transport Assessments • Road Safety Audits • Compliance with the Design Manual for Urban Roads and Streets (DMURS) • Integration with active travel and public transport infrastructure **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. It is considered that the proposed lands are ideally situated to deliver on transit-oriented development in line with national and regional policy objectives. It is further considered that CS7 SLO9 attached to the proposed rezoning will ensure that the lands remaining as open space will provide for improved and publicly accessible recreational amenity to the advantage of both new and existing residents in the area. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation. Planning authorities are requested to

	implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions. In order to address the issues raised by the Department of Education and Youth it is recommended that proposed Specific Local Objective CS7 SLO9 be added to as follows: **CS7 SLO9:** ***Having regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development.***
CE Recommendation To amend the Proposed Specific Local Objective CS7 SLO9 to add a new point 'b' as follows: a) In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social Club, details as to how public access, permeability and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority. ***b) Having regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development.***	

AMENDMENT NO. 12 - CHERRYFIELD WAY

Existing

Proposed

Submission No.

SD-C401-CDP25-773 – Deirdre Cooper

SD-C401-CDP25-835 – Michelle Staunton Staunton

SD-C401-CDP25-857 – Iain Briscoe

SD-C401-CDP25-874 – EUGENE BARRETT

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-923 – Eugenia Guspi

SD-C401-CDP25-983 – Ronan Byrne

SD-C401-CDP25-995 – Catherine Kearney

SD-C401-CDP25-996 – Paul O'Farrell

SD-C401-CDP25-1018 – Susan McManus

SD-C401-CDP25-1086 – Jane Hogan-Spain

SD-C401-CDP25-1142 – Ian Connery

SD-C401-CDP25-1166 – Kevin Hamilton	SD-C401-CDP25-1216 – Lorraine Daly	SD-C401-CDP25-1231 – Tom Rooney
SD-C401-CDP25-1285 – Ray Casey	SD-C401-CDP25-1303 – Amanda Sadlier	SD-C401-CDP25-1311 – Ashling McHugh
SD-C401-CDP25-1348 – Mary Ward	SD-C401-CDP25-1350 – Karen McEvoy	SD-C401-CDP25-1351 – Ballyboden St Endas GAA Club
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1443 – Electricity Supply Board
SD-C401-CDP25-1574 – Ciarán Ahern TD	SD-C401-CDP25-1583 – Niamh Fitzgerald	SD-C401-CDP25-1645 – Clare Hamilton
SD-C401-CDP25-1664 – Knocklyon Network	SD-C401-CDP25-1720 – Cathy Medbury	SD-C401-CDP25-1737 – John Bird
SD-C401-CDP25-1762 – John Ryan	SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG	SD-C401-CDP25-1874 – Sudway and Company Limited Chartered Surveyors

Summary	CE Response
The majority of the submissions received in relation to Amendment No. 12 object to the proposal at Cherryfield Way to rezone these lands from 'HA-DV' High Amenity Dodder Valley to 'RES' Existing Residential. The concerns raised related to a variety of issues around loss of pitches, impact on biodiversity and green Infrastructure, climate action, overdevelopment and community and social	Amendment No. 12 proposes the rezoning of lands zoned 'HA-DV' to 'RES'. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines. required Councils to identify the lands

infrastructure. Submissions were received from individuals, including local residents, local representatives, groups such as Ballyboden Tidy Towns and Knocklyon Network CLG, and state bodies such as the NPWS. There is also a submission from a landowner within the subject lands. **Overdevelopment** Submissions highlight the exponential growth in housing in the area and submit that it has led to pressure on all facilities in the area, which are not addressed, such as schools, community centres, swimming pool (in the Development Plan), roads, public transport, library and so on. Reference is made to the Two Oaks development and more about to come at Morton's, Castlefield Avenue, Scholarstown House. It is submitted that the area cannot sustain further housing development on any significant scale until structural issues are addressed – existing traffic issue and lack of vital facilities such as public transport, shops and school places. **Zoning and Phasing** Objection raised to areas designated as recreational (Cherryfield) and as schools (Stocking Lane) being rezoned as housing. Requests for future housing development proposals to be supported by clear infrastructure planning,	needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline

including provision for schools, healthcare services, transport capacity, and recreational amenities. Objections to the rezoning as recent public investment in road infrastructure has only just been delivered and this would likely be altered, removed, or rebuilt as part of any development, representing inefficient use of public funds and avoidable disruption for residents. Calls for a more strategic approach as a more detailed assessment of infrastructure capacity, community needs and environmental considerations should be undertaken before progressing with any rezoning decision. It is submitted that significant residential development is already approved in the area and the cumulative impact of these developments should be fully absorbed before additional land is rezoned for housing. It is submitted that the area proposed to be rezoned forms part of a larger Cherryfield property, yet no comprehensive masterplan or coordinated planning framework has been presented for the site as a whole. It is submitted that the proposed rezoning contradicts parts of the County Development Plan	target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. **Overdevelopment, Zoning and Phasing** The Planning Authority notes the comments received in relation to zoning, overdevelopment and phasing. In assessing the appropriateness of residential zoning, the Planning Authority is guided by the shared goals identified in the NPF and RSES as National Strategic Outcomes and Regional Strategic Outcomes, namely the achievement and delivery of Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society. Specially, this includes:

Written Statement and Maps, which give a high level of protection to the Dodder Valley Linear Parklands. It is submitted that the proposed rezoning from High Amenity to Existing Residential is a direct reduction in planning protection and a substantive policy choice to downgrade protection. Reference is made to the Cherryfield Way where used as a temporary construction compound for the Dodder Valley Greenway and associated car park improvements. It is stated that it was never indicated that the temporary use of these lands would lead to a permanent change in zoning or development status and it would be reasonable to expect that the land would be restored to its previous open landscape or amenity condition. **Zoning – Landowner** Submission made on behalf of landowner located south east of the traveller accommodation submits that the approximately 30m wide corridor of HA-DV zoning required by the variation alongside the Dodder greenway is unworkable and suggests an alternative 18m setback. The proposed rezoning omits, and is in conflict with, Units 4, 5, 9 and 10 of the Cherryfield traveller accommodation site. The submission makes the case that there is no basis for this, as there can be no basis for the residential use of these units to be	• Priority growth areas specified in the Metropolitan Area Strategic Plan • Compact growth and infill development • Brownfield/greenfield • Proximity to centres of services and social infrastructure • Proximity to high-capacity public transport These parameters are applied by the Local Authority in tandem with the objectives of the South Dublin County Development Plan 2022–2028, as well as other relevant Section 28 Guidelines issued by the DHLGH. 'HA-DV' zoned lands are primarily 'to protect and enhance the outstanding character and amenity of the Dodder Valley.' Table 9.2 Settlement Hierarchy and Retail Hierarchy of the CDP 2022-2028, lands located inside the M50 Corridor are defined at national and regional settlement level as the 'Dublin City and Suburbs – Metropolitan Area'. Therefore, the proposed 'RES' is appropriate in terms of the Settlement Hierarchy set out the CDP 2022-2028. The Council notes the concerns raised across submissions regarding the importance of phasing and infrastructure led development. The proposed zoning of the lands does not undermine infrastructure led planning but is supported by a plan led approach fully aligned with national and local policy. Part of the subject lands consists of residential Traveller Accommodation with the southeastern part accommodating a private residential home and outhouses. Therefore, there is an established residential use on this site over part of the identified lands.

extinguished, and therefore the 30m corridor alongside the greenway cannot be achieved within this part of the retained HA-DV zoning. Reference made to the landowner's original submission (under the non-statutory consultation) which suggested that the wider greenway corridor could be addressed by way of a Specific Local Objective on the lands or by a rezoning. It is submitted that the current proposed rezoning will create a 12m set-back from the eastern boundary of the Cherryfield traveller accommodation site that will be prone to anti-social behaviour, and result in an incoherent pattern of development that will offer no additional amenity value to the greenway. It is submitted that an 18m corridor, that runs parallel to the greenway across the private landowner's lands and which align with the eastern boundary of the traveller accommodation site, would create a strong and continuous biodiversity corridor alongside the greenway, and open up approximately 0.84ha. of the privately owned lands development, with the other 0.16ha. being ceded to the greenway in the event of planning permission being granted for the residential zoned lands. **Parks and Open Space**	With regard to this site, the Planning Authority refers to the SDCC Traveller Accommodation Programme (TAP) 2025-2029. In respect to existing accommodation, it states: *'To address the accommodation needs of Travellers, the Council propose a construction and refurbishment programme on several existing Traveller accommodation sites in consultation with the residents. The redevelopment of these sites is contingent upon funding from the DHLGH and the necessary planning approval'* The TAP 2025-2029 under '*Other Sites Under Consideration for Re-Development'* indicates that a feasibility study will be undertaken at Cherryfield and other locations to examine the potential for the construction of new Group Housing schemes. Part of the site is also occupied by a detached, two-storey dwelling with private gardens and amenity areas to the front, sides and rear. The dwelling is accessed from Firhouse Road to the south Therefore, it is considered that proposed Amendment No. 12 is consistent with the existing established residential use on part of these lands and TAP 2025-2029 objective as a site under consideration for future re-development. **Zoning – Landowner** Submission made on behalf of landowner of the dwelling house with private amenity areas located in the southeast part of the subject lands and accessed from Firhouse Road.

Concern raised of the impact of the proposed rezoning on the Dodder Greenway. Objections raised to the loss of open space and green areas generally at Cherryfield Way, and in particular the removal of playing pitches given the growing population and the high demand for more pitches to meet the needs of the area. Calls for plans showing where pitches will be moved to / replaced. Ballyboden St Endas GAA Club (BBSE) indicate that the land is used as a GAA pitch by the club, which caters for over 2,500 players and another 1,500 members and are one of the largest community organisation in the Firhouse / Knocklyon / Rathfarnham locality. It is asserted by BBSE that removing the use of this pitch will have a huge impact and makes things a lot more difficult as already struggling with pitch allocations for the large number of team catered for. The generous support of SDCC to BBSE is stated to be invaluable and always warmly acknowledged and it is considered critical that this continues. Submissions highlight that existing recreational facilities must be protected and where replaced with housing, the pitch must be replaced, with the same use, as close as possible to the original pitch.	It is submitted that the approximately 30m wide corridor of HA-DV zoning required by the variation alongside the Dodder greenway is unworkable and suggests an alternative 18m setback that runs parallel to the greenway across the private landowners lands and which align with the eastern boundary of the traveller accommodation site, creating a strong and continuous biodiversity corridor alongside the greenway, and opening up approximately 0.84ha. of the privately owned lands for development, with the other 0.16ha. being ceded to the greenway in the event of planning permission being granted for the residential zoned lands. It is also submitted that the proposed rezoning omits, and is in conflict with, Units 4, 5, 9 and 10 of the Cherryfield traveller accommodation site. Reference is made to the landowners original submission (under the non-statutory consultation) which suggested that the wider greenway corridor could be addressed via a Specific Local Objective on the lands or via a rezoning. It is submitted that the current proposed rezoning will create a 12m set-back from the eastern boundary of the Cherryfield traveller accommodation site that will be prone to anti-social behaviour, and result in an incoherent pattern of development that will offer no additional amenity value to the greenway. In this regard, the boundary of the proposed Amendment No. 12 lands is informed by the identified Riparian Corridor, as shown on the CDP 2022-2028 Maps. This is considered appropriate to ensure the protection of the Dodder Valley Riparian Corridor in this area.

Submissions criticise the removal of part of the Dodder Valley Park after significant investment has been made to raise the value for the community, with the installation of the Greenway, playgrounds, skate park, running track and so on. It is submitted that planning policy at both national and local levels generally seeks to protect established recreational lands, and such facilities should not normally be lost unless replacement facilities of equal or greater value are delivered in an accessible location and that the removal of this facility would represent a net loss of community sporting infrastructure at a time when population growth in the surrounding area is increasing demand for such amenities. Concerns are raised that the area could experience a strategic deficiency in active recreational open space, whereby demand for sports facilities increases while the amount of available recreational land decreases. Calls for the Council to demonstrate how the removal of this existing sports facility aligns with Development Plan objectives relating to open space provision, recreational infrastructure, and sustainable community planning. Calls for the promotion of infill and brownfield development without the need to zone green spaces/public parks	With regard to concerns regarding anti-social behaviour within the set back area to the east that runs the first/final leg of the Greenway, commencing/terminating at Firhouse Road, it is considered that any such issues can be addressed at concept and design stage while still protecting the indicated route of the Riparian Corridor located here. In practice it will not change the existing boundary along the private house with the greenway. *Image taken from the CDP 2022-2028 Maps showing the Riparian Corridor.* **Parks and Open Space**

It is submitted that the gradual erosion of open space through rezoning risks undermining sustainable planning and the long-term quality of life for residents. Calls for the lands to be retained for recreational or community use, recognising their importance to the local community. As a Planner with Dublin County Council, one submitter gave evidence to the CPO Public Enquiry that these lands were required for Public Open Space and for the re-alignment of Firhouse Road. It is submitted these lands were designated as High Amenity in the 1972 County Development Plan, but they also formed part of the Class 1 Public Open Space for the Knocklyon Action Area Plan and were the basis of subsequent Planning Permissions. It is submitted that the removal of a playing pitch from the local GAA club would negatively impact the community from participation in sport, and that more facilities are needed and not less with the additional population of the area. **Riparian Corrider, Green Infrastructure, Flora and Fauna**	Concerns are raised regarding the loss of 'HA-DV' park lands, loss of playing pitches and impact on the Dodder Valley Park and Greenway as a result of this amendment. The process of preparing a Variation to the County Development Plan 2022-2028 has been undertaken under Section 58 of the Planning and Development Act 2024 (as amended) and in response to the recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of associated Section 28 Guidelines and other guidelines published since the adoption of the County Development Plan in June 2022. The proposed variation is also responding to Pillar 1: Activating Supply as set out in the Government Action Plan on Housing Supply and Targeting Homelessness "Delivering Homes, Building Communities, 2025 – 2030" (November 2025). The zoning of sufficient land is seen as a key enabler to delivery. In this context, and as set out above, South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. It is noted that Cherryfield Park is identified in SDCC's *Sports Pitch Strategy* (2020). Ballyboden St Enda's GAA are identified as the relevant users. The loss of existing 'HA-DV' park lands and pitch space as a result of Amendment No. 12 is acknowledged. There are known anti-social issues on the subject lands. Passive surveillance from the public footpath and roadway to southeast and

NPWS reference is made to the belt of trees, both newly planted and dating back to the 19th century, bounding the lands on the river side. NPWS reference is made to the presence of badgers and bats in the immediate area and otters in the adjacent section of the Dodder. NPWS requests that all lighting in any future development, both external and internal, be designed to be bat friendly, should be movement activated as far as possible and strictly avoid the light pollution of the riparian strip between the rezoned lands and the Dodder. Reference is made to the Natura Impact Report (NIR) noting that the subject fields contain treelines and scattered trees. Submissions highlight the potential negative impact and disturbance to the nearby Dodder River and local watercourse and on the trees that line them. Reference made to environmental issues associated with other residential developments, namely Stocking Woods, Stocking Well, Woodstown Abbey, White Pines) and that development on this site would impact the spread of invasive species. Submissions stress the increasing importance to protect high amenity lands such as this as open	northwest is impeded by existing trees dotted around the southeastern and northwestern edge of the lands. As outlined above, there is an existing established residential use on part of the subject lands. There is a large private garden relating to the dwelling house located to south/southeast of the land parcel that is not open to the public. Therefore, Amendment No. 12 as proposed would be a more suitable land use objective for these parts of the subject lands. The loss of open space/pitch space relates to the remaining area which is not occupied by the TA or the dwelling and private amenity areas. It is acknowledged that rezoning existing 'HA-DV' lands or any High Amenity lands is not common practice by the Council. Variation No. 2 also contains proposals to rezone privately owned High Amenity lands at St. Edmundsbury in Lucan. However, it is considered that the subject site aligns with the national and regional policy in that it is located in a priority growth areas specified in the Metropolitan Area Strategic Plan, supports compact growth and infill development, is in proximity to centres of services and social infrastructure and is in close proximity to high-capacity public transport, in particular the R137 (Tallaght Road/Templeogue Road) heavily served by Dublin Bus, featuring frequent, direct routes between Tallaght (Luas), Templeogue, and Dublin City Centre. In addition, proposed Amendment No. 12 is consistent with the existing established residential use on part of these lands and TAP 2025-2029 objective as a site under consideration for future re-development and has excluded the area within the riparian corridor to ensure that the

space for recreation, wellbeing, and biodiversity as Knocklyon continues to grow. Concerns are raised regarding the impact of the Cherryfield Way rezoning on the existing landscape. Reference is made to a wider GI network within the Ballyboden-Knocklyon-Edmondstown area. It is submitted that the Dodder Valley Linear Park, the Cherryfield lands, the Owendoher Linear Park and the surrounding agricultural landscapes collectively form part of a connected environmental system linking the Dublin Mountain foothills to the River Dodder. It is submitted that the cumulative loss or fragmentation of permeable open landscapes may affect biodiversity corridors, landscape character and the natural environmental functions of the catchment, potentially weakening the continuity and functioning of the GI network. It is further submitted that the environmental role of these landscapes should be considered not only on an individual site basis but also in terms of their contribution to the wider GI network within the Dodder Valley and the foothills corridor. Submission highlights that it is essential that the cumulative environmental implications of rezonings and infrastructure proposals along the River Dodder corridor are carefully assessed.	integrity of the Dodder River is not compromised, in line with current CDP policy. It should be noted that any future development proposal on this site must comply with the CDP 2022-2028 pertaining to open space requirements. This must be read in conjunction with the Amendments proposed to the Written Statement under Variation No. 2 to align with the *Sustainable Residential Development and Compact Settlement Guidelines* (2024), including Amendments Nos. 57, 58, 59 and 60. It should be noted that the *South Dublin Parks and Open Spaces Strategy* (2025) refers to the Templeogue/ Walkinstown/ Rathfarnham/ Firhouse Neighbourhood Area and states that there are excellent public amenities within the neighbourhood, including shopping, schools, public parks and cultural attractions. Pearse Museum, St. Enda's Park and Rathfarnham Castle are especially popular attractions, set against the backdrop of the Dublin Mountains. It is further stated that Dodder Valley Park, Tymon Park and Greenhills Park, together with the adjacent Marlay Park and Bushy Park in the neighbouring county, contribute significantly to the amenity value of the Neighbourhood and to the Green Infrastructure network of the wider area. The Dodder River is considered a key Green Infrastructure Corridor and contains a proposed Natural Heritage Area and is also considered to be a key recreational and biodiversity resource running east-west through this neighbourhood. As a long-established neighbourhood, this area also has significant numbers of mature trees, all of which contribute to Green Infrastructure and Climate Adaptation measures. It is noted that the image below from the *South Dublin Parks and Open Spaces Strategy* (2025) excludes Cherryfield Traveller Accommodation

It is submitted that the lands at Edmondstown and at Cherryfield form part of the rural landscape of the Dublin foothills and contribute to the environmental and amenity character of the area.

Concerns are raised that the Variation may increase development capacity in the corridor without a corresponding framework for infrastructure provision, amenity protection or strategic planning coherence.

An addendum to the BBTT submission indicates that a locally circulated petition (link provided) highlights concerns over the potential loss or fragmentation of important open landscapes and amenities within the Dodder Valley, Cherryfield lands, Edmondstown agricultural lands and what is termed in the submission the Owendoher Linear Park corridor. It is stated that these landscapes form an important network of environmental and recreational amenities serving the Ballyboden and Knocklyon communities and are widely used for walking, outdoor recreation and environmental enjoyment. It is considered that this reflects a broader level of community concern, reflected also in the petition, regarding the long-term protection of these landscapes and their role within the wider green infrastructure network of the area.

Submissions highlight that the wider Dodder Valley Park area is a protected green belt area for

and the existing dwelling house, thus acknowledging its residential land use.

It is noted that the Council has delivered multiple Sports and Recreation projects since the adoption of the current CDP with many more projects being progressed under the Capital Programme 2026-2028 including the artificial grass pitches programme to be continued with €9,350,000 in funding assigned for planning, design, and construction of pitches under the Sports Pitch Strategy to provide additional pitches.

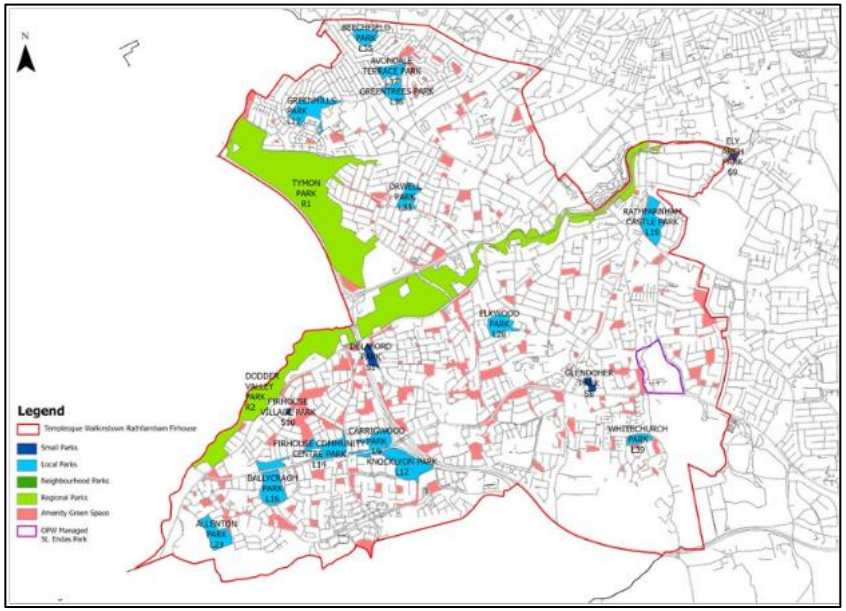


Image from SDCC's Parks and Open Space Strategy 2025

In addition, SDCC adopted its new play policy, The Nature of Play 2025–2028, in early 2026, focusing on creating accessible, inclusive,

recreation, sport, biodiversity and environmental conservation and the proposed rezoning would set a highly undesirable and dangerous precedent which will effectively remove the high amenity status. Submissions highlight the enormous environmental benefits these lands provide, particularly in light of climate change concerns. It is submitted that the rezoning conflicts the objective of Policy NCBH8 - protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley" as key Green Infrastructure. The proposal would remove a playing pitch from the local GAA club which negativly impacts the community from participation in sport. More facilities are needed and they should not be reduced with the additional population of the area. References are made to the SEA and AA to the Variation as recommending a robust ecologically informed buffer to the nearby Dodder. It is noted that the Natura Impact Report identifies the Dodder as establishing a hydrological pathway through the Liffey to Dublin Bay European sites and that wastewater from future development would be to Ringsend. The rezoning would also increase pressure on a river catchment that is hydrologically connected to downstream European sites, it is asserted. The	and high-quality play spaces. This policy aims to place playgrounds within 400m (5-minute walk) of all residential areas, emphasising sustainable, natural, and inclusive environments for children of all abilities. The Planning Authority will continue to work to implement the key actions of the Parks and Open Strategy and new Play Policy, together with the provisions of the CDP 2022-2028, and proposed amendment thereto, to continue to provide high quality open space and play spaces throughout the County including within the Templeogue/ Walkinstown/ Rathfarnham/ Firhouse Neighbourhood Area. **Riparian Corridor, Green Infrastructure and Flora and Fauna** Concerns are raised regarding the impact on the riparian corridor which follows the Dodder River and Valley and this important green infrastructure corridor. The subject land intersects with an identified Riparian Corridor under the CDP 2022-2028, which set out specific policies and objectives in this regard and in relation to Green Infrastructure corridors within the County and Appendix 4 Green Infrastructure: Local Objectives and Case Studies. Any development proposals for these lands would need to address these which explicitly prioritise the safeguarding and enhancement of existing green infrastructure features, ensuring that they form a core structuring element of any future development layouts. The NPWS comments regarding known badgers, bats and otters in the area are noted as are the requests pertaining to lighting.

road network is already constrained, and the rezoning would increase development pressure. It is suggested that this interaction is not adequately assessed on a cumulative basis. It is submitted that any long-term consideration of the Cherryfield lands should occur through a coordinated masterplan process that evaluates the entire property in the context of the Dodder Valley Linear Park, the wider GI network, landscape and visual character, flood management and watercourse protection, biodiversity and riparian habitats and public recreation and amenity needs. Calls for the planning authority to clarify how, in the context of Objective COS4 SLO2 of the CDP, the proposed rezoning aligns with the wider objective of providing indoor sports and recreational facilities to meet the needs of the growing population in the Knocklyon-Ballyboden area. It is suggested that the site may represent opportunities for enhanced recreation or community amenity provision within the wider Dodder Valley park system. It is suggested that the role of the lands within the Dodder Valley landscape and wider amenity network of the area would benefit from careful consideration within a coordinated planning framework. It is considered important that it is demonstrated that the proposed rezoning will not contribute to the incremental erosion of the Dodder Valley amenity corridor or set	Any future development at this site would be subject to EIA and AA screening. The Council submits that Amendment No. 12 aligns with national, regional and county level Climate Action objectives which support a compact approach to growth with the aim of facilitating the delivery of climate resilient and sustainable communities throughout the County. The efficient use of land with a focus on key urban centres, and achieving development densities that can support vibrant, compact, walkable places that prioritise pedestrian and cyclist movement is central to this, together with other Climate Action measures such as multi-functional green infrastructure and sustainable drainage systems (SuDS). **Schools** Concerns were raised that school place capacity/ availability in the area. In recent years, at the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area, the following school place provision related activity is noted: • New School – Gaelscoil Chnoc Liamhna, Dublin 16 – delivered in 2023. • Major Project to provide a new permanent school for Firhouse Educate Together Secondary School on Oldcourt Rd, Ballycullen, Firhouse, is currently at Stage 3 (Tender Stage). Firhouse ETSS is currently in temporary accommodation on the same site. • Major Project at Sancta Maria College, Ballyroan, to provide a new PE hall, changing rooms and toilets, is currently at Stage 2b (Detailed Design).

an unintended precedent for the future loss of similar amenity lands within the wider park system. Submission highlights the value of the open space for the community and as a refuge for wildlife. The proposal would remove a playing pitch from the local GAA club which negatively impacts the community from participation in sport. More facilities are needed and they should not be reduced with the additional population of the area. **Public Transport, Traffic and Roads** Submissions highlight significant traffic congestion, particularly during peak commuting and school travel times, particularly in the Knocklyon area and on Firhouse Road. Additional residential development on this site would introduce further traffic movements onto an already busy road network, it asserted. It is submitted roads that have been made smaller have led to more congestion and extra housing will make things worse. Concerns raised that, having regard to funding already approved for the realignment of Knocklyon Road, and the cumulative impact of this future infrastructure change, combined with the additional traffic generated by a large residential development, could significantly worsen congestion levels in the area.	• Major Projects at Templeogue College and the Libermann Spiritan School for extensions/additional accommodation are currently at Stage 2a (Developed Sketch Scheme). • Major Project at Clochar Loreto National School, Ratfarnham, for construction of 21 classroom primary school building is at Stage 3 (Tender Stage). It is noted that the Department of Education and Youth in their submission in relation to Variation No. 2 notes the settlements increases in Core Strategy Table 11 of the Variation over what is currently in the CDP and indicate that their preference would be to expand existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. It should be noted that the CDP 2022-2028 sets out numerous policies and objectives to guide and support school place provision within the County. The Planning Authority meets with the Department on a regular basis to actively review school needs and proposals to ensure adequate school places are delivered and planned for, in accordance with the needs and research undertaken by the Department. With regard to Amendment No. 21, the Department raises concerns regarding the proposed removal of the school site objective to facilitate residential development. Having regard to the Department of Education and Youth's comments, and on review of the latest Housing Supply Monitor figures for this Neighbourhood Area, it is recommended that the existing School Site objective on Stocking Avenue be retained as a recommended amendment under this CE Report. This set out in detail under Amendment No. 21.

Submissions highlight insufficient public transport services that are at capacity during peak hours and can experience delays due to existing traffic congestion. It is submitted that public Transport provision has not kept up with the re-zonings and the increased densities. **Community and Social Facilities** Submissions highlight the significant increase in housing in the Knocklyon and Dublin 16 area without the local amenities and schools (especially Secondary) to accompany the extra residents. Objections to the rezoning due to the amount of development in the area already and the lack of community and social facilities to support it. Submission raise concerns regarding a lack of services in the area and submit that access to GP services and healthcare facilities in the wider area is already limited and increased population density without additional healthcare infrastructure may further strain already stretched services. Submissions call for local objectives for community facilities, such as the swimming pool and indoor sports facilities, should be delivered in advance of the residential development.	**Public Transport, Traffic and Roads** Concerns are raised in the submissions regarding existing traffic congestion in the area, which would be exacerbated by any future development, the realignment of Knocklyon Road, and the cumulative impact of this future infrastructure change, and insufficient public transport services in the area. The South Dublin County Development Plan 2022-2028 sets out Sustainable Movement and Transport related policies objectives, which seek to prioritise sustainable modes including walking, cycling and public transport, reduce reliance on private car use and ensure transport and land use integration. Policy SM1 & SM2 promote modal shift and integrated transport networks and ensure that new developments are located where they can be served by high-quality public transport. Large-scale residential development often requires detailed Transport Assessments and Mobility Management Plans for significant and seek permeability and connectivity within schemes to promote active travel Concerns regarding traffic generation and road safety are acknowledged. All significant developments will require Traffic and Transport Assessments (TTA). In addition, junction capacity, road safety, and cumulative impacts will be assessed at application stage. Road Safety Audits and appropriate mitigation (e.g., junction upgrades, traffic calming) will be required where needed. It will also be required that development is designed to integrate with existing and proposed BusConnects corridors.

Schools Concerns raised that many local schools are operating close to capacity and securing places in nearby primary and secondary schools can already be challenging for families living in the area and the proposed rezoning risks exacerbating existing capacity pressures. Reference made to an opportunity to build a bigger secondary school up at Two Oaks to accommodate the expanding house plans but this was not done. Concerns raised regarding distance children need to travel far to get to school as there is not enough schools in the area. It is submitted that the rezoning will put more pressure on existing secondary school, both of which are already heavily oversubscribed. Calls for a mixed secondary school to be built. **Wastewater** Reference is made to the Uisce Éireann submission to the variation noting that the 9B sewer is constrained and potential solutions, and noting that UÉ indicates that wastewater upgrades are likely to be required for Edmondstown Road and Cherryfield Way rezonings. It is submitted that the cumulative wastewater implications of additional residential development should be clearly addressed. The High Court's	In addition, the subject lands is in walking distance of local and village centres services and social infrastructure and high-capacity public transport, in particular the R137 (Tallaght Road/Templeogue Road) heavily served by Dublin Bus, featuring frequent, direct routes between Tallaght (Luas), Templeogue, and Dublin City Centre, promoting more sustainable transport movement and reduced car dependency. **Active Travel** The promotion of active travel is a central objective of the South Dublin County Development Plan 2022–2028, and national planning policy. The Dodder Valley Greenway commences / terminates immediately adjacent to the subject lands. The route of the Greenway runs along the eastern boundary of the subject lands before turning eastwards and extending through the Dodder Valley. The Greenway serves as an off-road Active Travel link with multiple points of exit/egress points from the adjacent suburban area. The Greenway is also an important amenity at local, county and regional level. **Miscellaneous** It is submitted that there was a lack of consultation regarding the proposed Variation: The Council carried out extensive consultation in respect to Variation No. 2. In response to the Guidelines, South Dublin County Council (SDCC) invited the public, landowners, homebuilders and other interested stakeholders to put forward suggestions for lands within the County that may be suitable for residential uses to contribute to meeting the revised housing requirements. In this regard, a non-statutory consultation was held by South Dublin County Council over the period 23rd October to Thursday, 13th November 2025.

emphasis on clarity, transparency and proper environmental assessment in planning decision-making is referenced and the submission states that this is particularly relevant where the variation is within a catchment where strategic wastewater infrastructure is constrained and hydrologically connected to downstream European sites. It is submitted that the cumulative infrastructure capacity at plan level needs to be assessed, noting the interaction between wastewater capacity, additional residential development and downstream water quality. **Miscellaneous** Objections to the lack of consultation on this and the many other zoning changes proposed under this consultation for Variations to the Development plan. **Flooding and SFRA** Submission highlights that the Strategic Flood Risk Assessment (SFRA) identifies that the site is slightly within the HEFS 1% and 0.1% AEP flood risk zones.	In accordance with Section 58 (7) and (8) of the Planning and Development Act 2024 (as amended), the Proposed Variation No. 2 and the Draft Environmental Reports were put on public display between 13th February 2026 and 13th March 2026. Public notices notifying members of the public that the Proposed Variation was on public display were published in the Irish Times (English) and in the Tallaght Echo (in English and Irish) and on the Council's website. The Variation, supporting documentation and environmental assessments were published on the Council's consultation portal inviting written observations and submissions. Public consultation on the Variation was also promoted through the Council's social media. The Proposed Variation was made available to view at Lucan Library and County Hall, Tallaght during normal opening hours (excluding public holidays). Two public information drop-in sessions were held during which Council staff were available to answer questions. 2,678 submissions were received in total on the Proposed Variation within the consultation period. **Utilities** In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place.

	A submission was received from the Electrity Supply Board (ESB) with regard to the overall variation, which indicated no site-specific objections to the proposed variation. SDCC is currently engaging, and will continue to engage, with both Eirgrid and ESB to facilitate the wider upgrade requirements for the electricity network. In relation to individual sites, connections to the network have to be agreed with ESB by the developer for new developments. The proposed zoning of the lands does not undermine infrastructure-led planning but is supported by a plan-led approach fully aligned with national and local policy. **Water and Wastewater** Submissions make reference to Uisce Éireann's submission, in particular regarding the 9B sewer and wastewater upgrades that are likely to be required for Edmondstown Road and Cherryfield Way rezonings. In relation to Cherryfield Way, Uisce Éireann in their submission to the Variation indicate the follow: *Upgrades may be required (developer-funded)* A detailed assessment in respect to water and wastewater requirements will be required as part of any planning application and be agreed with UÉ. **NPWS** As outlined above, the NPWS refer to the Dodder Valley and known wildlife in the area, namely badgers, bats and otters. The NPWS submission requests that all lighting to be installed in such development, both external and internal, should be designed be bat

	friendly, should be movement activated as far as possible and strictly avoid the light pollution of the riparian strip between the rezoned lands and the Dodder. Any such future development of these lands would be subject to further environmental assessment, including EIA and AA screening. **Environmental Assessments** The Council notes the issues raised in respect to the impact of the proposal on the Dodder Valley and with regard to flood risk and the SFRA. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Cherryfield Way. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation. Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. Following this review of the issues raised, the following comments were received: 'The potential effects on the receiving waters on the Dodder catchment are addressed and assessed at strategic and county scale in proportion to the county scale of the proposed variation. The SEA and NIR will provide more cumulative assessment across the proposed variation on surface and groundwater via assessment of

	Proposed Variation lands across sub catchments identified under the WFD. This complements the existing data from WFD in relation to water quality in and around the plan area. AA: Section 7.2 of the NIR states: ".. of the four European Sites being examined as part of the assessment of the hydrological pathway, only three are connected to the project site via the surface water pathway. The nearest point of the three Dublin Bay European Sites from a Proposed Variation Land or Future Strategic Long-term Development Area is approximately 13km downstream (i.e. downstream from Proposed Variation lands Cherryfield Way along the River Dodder). The River Dodder and the waters discharging from it to the Liffey Estuary represent a minor fraction of the overall volume of freshwater draining into the Liffey estuary and Dublin Bay. This will limit the potential for future projects facilitated by the Plan, even in the event of the release of contaminated surface water from synchronous development in multiple Plan areas from having a perceptible effect on water quality and the conservation status of European Sites at Dublin Bay. This point is supported by previous studies which have shown that pollutants in the estuary are rapidly mixed and become diluted within the estuary and Dublin Bay (O'Higgins and Wilson, 2005; Wilson and Jackson, 2011), demonstrating that any potential for the release of contaminants to hydrological pathways and Dublin bay will not have the potential to result in any perceptible effect to water quality downstream at Dublin Bay." Section 7.5 of the NIR and Section 7.3 of the SEA ER identify and comment on the potential for significant cumulative effects arising from plans in particular, given this is a county scale land use plan. Plans and programmes considered as part of this assessment includes the

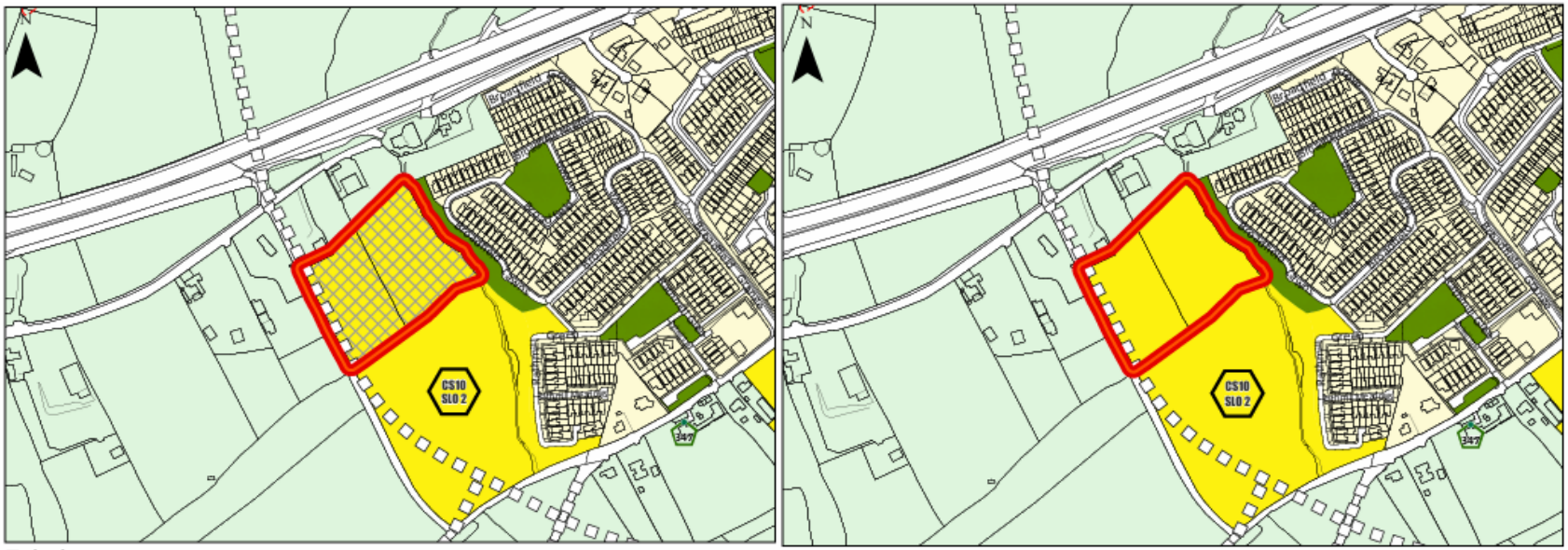
	hierarchy of land use and related plans pertinent and relevant to the Proposed Variation, namely: • National Planning Framework First Revision, • River Basin Management Plan for Ireland 2024, • Eastern and Midland Regional Economic and Spatial Strategy, • Catchment-based Flood Risk Assessment and Management (CFRAM) and Flood Risk Management Plans, • Greater Dublin Drainage Project, • National 4th Biodiversity Action Plan 2023-2030, • Transport Strategy for the Greater Dublin Area 2022- 2042, • South Dublin Climate Change Action Plan 2024 -2029, • BusConnects, • DART+ South West and DART +West, • Dublin City Development Plan 2022 -2028. Dún Laoghaire • Rathdown County Development Plan 2022 -2028. Kildare County Development Plan 2022 -2028. Fingal County Development Plan 2023 -2029. All of the above plans and programmes have been subject to full SEA and AA and where relevant project level assessment via the EIA and AA Directives. As the SEA and AA conclude relating to transport related projects. Of the above transport related projects BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in

	addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. Consideration of projects that are currently going through the planning process is somewhat speculative and again beyond the scope of the SEA to consider all active travel projects or proposals under consideration by SDCC or TII. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Lands which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process'. Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to

	the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **SFRA** The SFRA for these lands is as follows: *Proposed variation site 169 (Cherryfield Way) comprises amenity grassland and developed land with residential use. It is situated to the north of Firhouse Road to the south of Templeogue. The lands are currently zoned for enhancement and protection of outstanding natural character and amenity. The River Dodder runs approximately 40m to the northeast of the site. The site is not situated within Flood Zones A or B, nor in the 1% AEP and 0.1% HEFS extents. The zoning has been pulled back further than the riparian corridor. Thus, no justification test is required and the variation to the land use zoning in the CDP is appropriate. Flood risk for any new development should be assessed in accordance with Section 4.3 of this SFRA.* Thus, no justification test is required and the variation to the land use zoning in the CDP is appropriate. Flood risk for any new development should be assessed in accordance with Section 4.3 of this SFRA, which relates to Development in Flood Zone C but adjoining or in close proximity to Flood Zone A or B and recommends that as a minimum, a site specific flood risk assessment should be undertaken which will screen out possible indirect sources of flood risk and where they cannot be screened out it should present mitigation measures. **Conclusion** South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and

	climate action and to deliver on the revised housing targets set for the county. The lands at Cherryfield Way are within the Dublin City and Suburbs settlement area, have existing residential use on a significant area of the proposed rezoning, and are accessible to public transport and good active travel links. It is considered that the proposed rezoning would rationalise the use of the lands, overcome existing issues in relation to the current ability to use the pitch, and have sufficiently protected the riparian corridor of the Dodder River. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to proposed Variation No. 2 (Amendment no. 12) to the County Development Plan 2022-2028.	

AMENDMENT NO. 13 - RATHCOOLE



Existing

Proposed

Submission No.

SD-C401-CDP25-3 – Stephen Nolan

SD-C401-CDP25-195 – Michael Kelly

SD-C401-CDP25-257 – Graham Martin

SD-C401-CDP25-326 – Sean Keane

SD-C401-CDP25-343 – Dijo Joseph

SD-C401-CDP25-360 – Noel Crowley

SD-C401-CDP25-465 – Magdalena Zajac

SD-C401-CDP25-511 – Sarah Clery

SD-C401-CDP25-692 – Roisin Quinn

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-1037 – Dillon Gill

SD-C401-CDP25-1113 – Gena Mc Cafferty

SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1513 – National Transport Authority
SD-C401-CDP25-1553 – Cllr Linda de Courcy	SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1704 – Piotr Zajac
SD-C401-CDP25-1802 – Kingswood Heights Residents Association NIA		

Summary	CE Response
Zoning and Overdevelopment The majority of submissions object to Amendment No. 13, mainly due to overdevelopment concerns. The change in designation is not appropriate at this time as the Rathcoole area lacks adequate infrastructure, amenities and services. Rezoning would also contribute to the loss of open and green space, natural habitats, valuable woodland and biodiversity. Other proposals within this Variation, such as the rezonings in Newcastle and Citywest, will only make this situation worse and risks overpopulating the area. The need for housing is acknowledged but the submissions emphasise that there is a need for infrastructure and services to be put in place first before any new developments. A submission states that the Variation site will not be built upon during the lifetime of the plan. Therefore, Rathcoole will have no further growth relative to neighbouring settlements (Newcastle and Saggart).	**Site Context and History** The lands subject to this proposed rezoning are located along Whitehouse Lane, (Amendment No. 13) off Windmill Road to the west of Rathcoole with the Applegreen Service Station lying to the north along the N7. The proposed site, consisting of approximately 2 hectares, was originally zoned 'RES-N' in 2016 to form part of the South Dublin County Council Development Plan 2016-2022. This zoning aimed 'to provide for new residential communities in accordance with approved area plans.' However, the site remained undeveloped during the plan period. During the preparation of the South Dublin County Council Development Plan 2022–2028, it was determined that sufficient land was zoned at the time to reach the county's population targets, as set out in the Core Strategy and Settlement Strategy Chapter. As such, while retaining the underlying zoning, the site was designated to be a 'Strategic Residential Reserve' (SRR) in 2022 to ensure that the lands would have a longer-term delivery capacity. The purpose of this designation was 'to protect and safeguard strategic residential reserve

Requests the council to zone appropriate land in Rathcoole for new developments to help with the housing crisis. **Traffic and Roads** Multiple submissions state that Rathcoole Village and the surrounding road network is already heavily congested and are at an unsustainable level. Many journeys, which should only take a few minutes can take over an hour at peak times. This is aggravated by: - A high volume of HGV's crossing the N7; - No alternative routes to access the N7 inbound; - The continued expansion of Greenogue logistics and industrial estates and; - Public transport services not adequately meeting the needs of the population. This congestion creates dangerous conditions for pedestrians, cyclists and school children. To help address the traffic issues, a number of submissions state that there is a need for: - A second N7 interchange and flyover; - A new ring road from Saggart to Newcastle and; - Road upgrades. These must be delivered before/in tandem with new development.	lands for potential future residential growth beyond the lifetime of the plan'. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken.

The NTA has indicated that the proposed rezoning (sic) at Rathcoole, while not as accessible as those north of Lucan and at Liffey Valley and Coldcut, may still be regarded as aligning with the principle of consolidation into existing settlements. **Schools** A number of submissions state that schools in the area are at capacity. A submission states that the new school in Rathcoole, which is near completion, will be the same capacity as the existing school and therefore will be under capacity from the day it opens. Another submission states that despite the support of all local public representatives and a strong community campaign to establish a secondary school in Newcastle, the Department of Education has not aligned the delivery of post-primary school places with on-the-ground population growth and projected residential expansion. Requests that local councillors place a condition on the residential zoning on Newcastle and Rathcoole that it cannot take effect until there is clear commitments and timelines in respect of the delivery of the permanent buildings for Rathcoole Educate Together National School and that the 'Regional Solution' additional secondary school be located in Newcastle. A submission states that education infrastructure should be delivered in	When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has identified lands which have been carefully evaluated through a criteria-based approach to best meet the housing shortfall for 2028 with built-in additional capacity. **Variation Proposal** Given the need to rezone more land in the county to accommodate the county's increased housing growth targets since the adoption of the County Development Plan, as set out 'Variation Context and Process' heading above, the Variation proposal is seeking to remove the Strategic Residential Reserve (SRR) designation, thereby removing this constraint on the development of the zoned lands and allowing for residential development.

parallel with housing and there should be alignment with the Department of Education. It is stated that safer pedestrian and cycling infrastructure is needed near schools. The Department of Education and Youth have not made direct comment on school infrastructure requirements for Rathcoole. However, they have acknowledged the Variation's proposal to reserve a secondary school site as part of rezoning of lands at Ballynakelly in Newcastle. **Community and Social Facilities** A number of submissions state that public services, such as medical/healthcare, community facilities, libraries, community centres, sports facilities and recreation amenities, are struggling to meet the current demand. Additional housing without the guaranteed provision of adequate services would place an unsustainable burden on the community. A submission states that the development in Rathmills was supposed to include an on-site crèche and playground, neither of which has been delivered by the developer. **Water and Wastewater** Uisce Éireann states that the Rathcoole Major Trunk watermains traverse the southern boundary of the site but direct connection not allowable. States that wayleave must be maintained, and development	**Zoning and Overdevelopment** Submissions objecting to the Variation proposal and the concerns regarding overdevelopment are noted. Regarding Rathcoole's context, Rathcoole is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described in the Regional Spatial and Economic Strategy as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. It is acknowledged that Rathcoole's population has expanded rapidly in recent decades; there has been a 97.9% change in growth between the years 2006 and 2022. Considering this growth as part of its analysis, Variation no. 2 sets out a clear and phased approach for residential capacity within Rathcoole. Table 9 of the Written Statement in proposed Variation no. 2 sets out the current capacity in the adopted Plan of undeveloped lands within Rathcoole likely to be delivered within the current and subsequent Development Plan periods. This identifies potential to accommodate 711 units / 21ha in total. Table 9.2 then identifies that 119 of these units are forecast to be delivered within the current Development Plan period. Table 10 shows the additional zoned lands based on the Variation. This includes the approximate 69-unit capacity associated with this

can't inhibit access for maintenance or endanger its structural integrity.	Amendment 13 on the 2-hectare lands already zoned to the west of Rathcoole. This is reflected in the Core Strategy Table 11 with total capacity up to 2028 in Rathcoole estimated as 188 units. Based on this, there is sufficient land remaining zoned after 2028 to accommodate a further 523 units. It is considered that Rathcoole can accommodate the moderate level of growth introduced by the proposed Variation on the zoned lands and that it aligns with its categorisation as a self-sustaining growth town. Given the above, the rezoning of further land at this time, as requested in one of the submissions, is not required and would not be sustainable at this time. **Traffic and Roads** The Planning Authority acknowledges that the existing road network in the Saggart / Rathcoole / Citywest area experiences peak-hour congestion, particularly on radial routes linking to the N7 corridor and within local distributor roads during morning and evening commuting periods. However, the assessment of road capacity within the Development Plan context is undertaken on the basis of: • Strategic transport modelling at GDA level, led by the National Transport Authority • Local traffic assessments undertaken as part of Development Plan preparation • Ongoing monitoring of traffic conditions and junction performance.

	In addition, zoning of land does not in itself permit development, and all future planning applications are required to be supported by site-specific Traffic and Transport Assessments, which must address: • Local and cumulative traffic impact • Junction capacity and safety • Travel demand management measures • Alignment with modal shift objectives Where deficiencies are identified, mitigation measures are required to be implemented prior to or concurrent with development. The Planning Authority also acknowledges the submissions emphasis on infrastructure-first and phased development. The County Development Plan already provides for: • Phased growth informed by the Settlement Capacity Audit • Infrastructure appraisal as part of Development Plan monitoring • The ability to withhold or condition development where critical infrastructure is not available. The 'Western Dublin Orbital Route' Road is part of the six-year road programme in the County Development Plan and traverses the western boundary of the site. The description of this road in the County Development Plan, Table 7.5 is that it will provide a 'link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be primarily to provide resilience to the M50, recognising that this may

	also provide additional resilience to peripheral roads within the county, in particular between the N7 and N4'. While the County Development Plan includes this indicative road alignment, in response to Specific Local Objective SM6 SLO 1 of the South Dublin County Development Plan 2022–2028 the Planning Authority is currently preparing a brief for a Transport Assessment and Transport Plan for the western area of the County. It is envisaged that the Transport Assessment and Transport Plan will be developed using an Area-Based Transport Assessment (ABTA) methodology, in accordance with TII and NTA guidance, and that one or more Local Transport Plans will be prepared. Subject to the final scope, the process is expected to include public consultation and will assess existing and future travel demand across all transport modes, review existing and planned transport infrastructure and services, identify the need for additional transport interventions, assess options including phasing and cost implications, and identify an integrated package of transport solutions. Having regard to same, appropriate solutions for the transport infrastructure to the west of the County, including this area, has yet to be determined. However, it is intended that this strategic transport plan will arrive at a list of phased transport schemes at a strategic and local level to cater for the current and future transport needs of the western area of SDCC. Regarding the NTA submission, it should be noted that the lands in Rathcoole are already zoned. The NTA notes that Rathcoole is not as well served by public transport as some of the other sites in the

	proposed variation but recognises that lands at this location align with the principle of consolidation into existing settlements. **Schools** The council notes the submissions concerns regarding school capacity. However, there are a number of major school projects underway in Rathcoole: - Rathcoole ETNS project is currently at Stage 2b (Detailed Design). Permission has been granted in Q4 2024 for a new primary school at Lands south of Coolamber Drive, Rathcoole, Co. Dublin (Planning Ref. SD23A/0336). - Major Project at Holy Family Community School, Rathcoole, for a new post-primary school. The project is currently On Site (under construction) (Planning Ref. SD16A/0029 and SD16A/0029/EP). - Major Project at Scoil Chronáin Primary School, Rathcoole, to provide a new replacement school is currently at Stage 3 (Tender Stage). This project was identified in the First Tranche of NDP Rollout by the Department of Education and Youth in Q1 2026. Also relevant to wider Citywest / Saggart / Rathcoole / Newcastle neighbourhood area is the provision for a post primary school as part of the SLO within Amendment no 1. at Ballynakelly, Newcastle. This is in accordance with the County Development Plan objective COS8 SLO 1 which states: *COS8 SLO 1* *To identify a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest / Saggart / Rathcoole / Newcastle to provide for the needs identified for the catchment area by the Department of Education.*

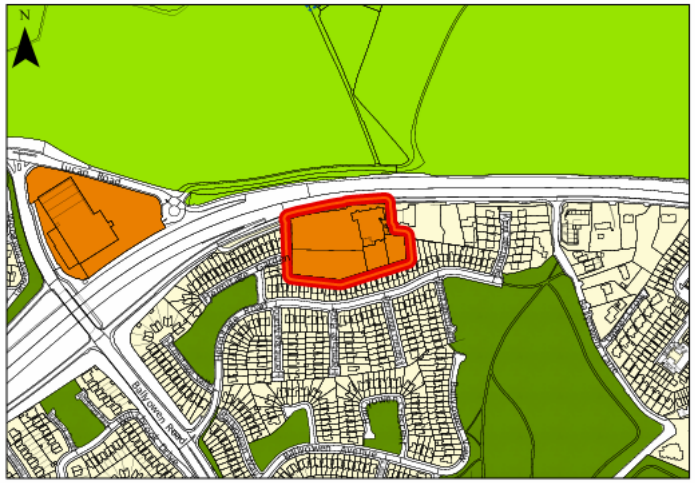
	The Department of Education and Youth has acknowledged the SLO which includes for this school reservation. Regarding the submission which states that safer pedestrian and cycling infrastructure is needed near schools. The County Development Plan seeks to promote this and contains the following objectives: SM2 Objective 7: *To promote walking and cycling for school trips by implementing the following measures:* *-Identifying school sites that are as close as possible to the communities they serve;* *-Ensuring that multiple access points are provided to school sites for pedestrians and cyclists;* *-Ensuring that adequate and secure bicycle storage is provided within schools;* *-Promoting initiatives such as the Green Schools and Schools Streets projects;* *-Prioritising school routes for permeability projects and provision and enhancement of pedestrian and cycle ways;* *-Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools.* COS8 Objective 4: *To support and facilitate the extension of existing school facilities, based on identified needs, subject to appropriate safeguards in relation to safe travel to school, traffic management and the amenities of the area.* COS8 Objective 6:

	To ensure new schools are designed and located to promote walking and cycling and access to public transport, by implementing the following measures: *-Ensuring school sites are in locations that are central and accessible to the communities they serve;* *-Providing infrastructure including safe cycle ways and footpaths;* *-Requiring a mobility management plan for all new schools that prioritises active travel modes and public transport;* *-Incorporating measures to promote walking and cycling at design stage including permeability and connectivity with the surrounding area through provision of adequate access points for pedestrians and cyclists;* *-Ensuring the provision of adequate secure bicycle storage;* *-Working with existing and new schools to increase the proportion of students walking and cycling through the promotion of initiatives such as the 'Green Schools' and 'School Streets' projects. (Refer to Chapter 7: Sustainable Movement);* *-Introducing measures that would support increased bus services to enable more students to travel to school through public transport.* **Community and Social Facilities** The concerns regarding the lack of community and social facilities are noted. The South Dublin County Council Capital Programme Update (April 2026) outlines that SDCC is 'working on design and fit-out planning to introduce a library hub within Rathcoole Courthouse that will provide core library services as well as supporting events, cultural activities and community-based programming'. Also, it was announced that the council's greenspace programme will 'commence in sequence at Rathcoole Park, Sean Walsh Park, Clondalkin Park and Dodder Valley Park (western section) over the coming weeks with delivery of these expected by autumn'.

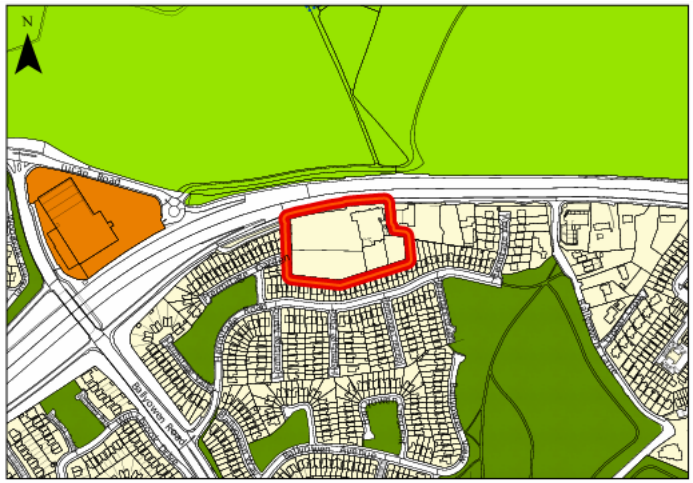
	In addition, a new HSE primary care facility has been delivered in proximity to Rathcoole at Citywest. Through the Development Management process, all planning applications are assessed in terms of their impact on green space and biodiversity. In the County Development Plan, there are a number of objectives which seek to protect and encourage greater consideration of biodiversity and ecosystem services in the relevant planning applications. For example, an innovation of the Plan was the requirement for a Green Space Factor (GSF). This is a score-based system that establishes minimum standards for listed GI interventions in new developments. GI5 Objective 4: *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).* Regarding the Rathmills development, any planning enforcement queries should be directed to the planning enforcement section of the Council. This is not a matter for the Variation. **Water and Wastewater**

	The submission from Uisce Éireann is noted. The detail in the submission will be addressed at planning application stage and through the requirement for the developer to engage with UÉ in advance of development. South Dublin County Council will continue to liaise with Uisce Éireann on an on-going basis. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The proposed Amendment Ref. 13 is for lands that have already gone through the zoning process and been adopted for residential development. The proposed Amendment is simply seeking to remove a designation which retained them for future development. Given the revised housing targets, their release for immediate development is now required. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to Variation No. 2 (Amendment no. 13) to the South Dublin County Development Plan 2022-2028.	

AMENDMENT NO. 14 - FOXHUNTER



Existing



Proposed

Submission No.

SD-C401-CDP25-41 – Ilya Ustinov

SD-C401-CDP25-65 – Tracy Malone

SD-C401-CDP25-110 – Anna Chrysovergi

SD-C401-CDP25-147 – Conor OShea

SD-C401-CDP25-171 – John O'Shea

SD-C401-CDP25-176 – Emer Dunne

SD-C401-CDP25-181 – Tony O Dowd

SD-C401-CDP25-198 – Brian Richardson

SD-C401-CDP25-203 – David O'Reilly

SD-C401-CDP25-259 – Paul mcentee

SD-C401-CDP25-261 – Philip Jordan

SD-C401-CDP25-262 – Cillian Doyle

SD-C401-CDP25-267 – Tina Lewis

SD-C401-CDP25-272 – James Murphy

SD-C401-CDP25-273 – Patrick Bradshaw

SD-C401-CDP25-275 – Catherine Murphy	SD-C401-CDP25-280 – Jennifer Rafter	SD-C401-CDP25-282 – John Kelly
SD-C401-CDP25-284 – Colin Bond	SD-C401-CDP25-285 – Trisha Duffy-Barber	SD-C401-CDP25-311 – Ann Crowley
SD-C401-CDP25-328 – Gerard Clarke Clarke	SD-C401-CDP25-330 – Sarah McDermott	SD-C401-CDP25-356 – Susan Kavanagh
SD-C401-CDP25-359 – Shane Nestor	SD-C401-CDP25-363 – Owen O Brien	SD-C401-CDP25-388 – Robert Maloney
SD-C401-CDP25-400 – Majella Bond	SD-C401-CDP25-413 – Vivek Soni	SD-C401-CDP25-414 – niall oneill
SD-C401-CDP25-418 – Michael Delany	SD-C401-CDP25-419 – Allison Davis	SD-C401-CDP25-429 – Stuart Campbell
SD-C401-CDP25-431 – Lorna Quinn	SD-C401-CDP25-455 – Elizabeth O'Reilly	SD-C401-CDP25-456 – Thomas O'Reilly
SD-C401-CDP25-463 – Alan Tolan	SD-C401-CDP25-469 – Patricia Graham	SD-C401-CDP25-477 – Joe Mahon
SD-C401-CDP25-478 – Paul Donnelly	SD-C401-CDP25-480 – Joy Hearn	SD-C401-CDP25-483 – Enda Haughey
SD-C401-CDP25-492 – Barbara Kenna	SD-C401-CDP25-493 – Liam Morgan	SD-C401-CDP25-496 – Roger Cromer
SD-C401-CDP25-506 – Neal Murphy	SD-C401-CDP25-512 – John Sheehan	SD-C401-CDP25-514 – Fearghal Bracken
SD-C401-CDP25-528 – Natasha Bartlett	SD-C401-CDP25-530 – Micheál Boland	SD-C401-CDP25-534 – Julie Keane

SD-C401-CDP25-552 – Ruth Meehan	SD-C401-CDP25-557 – Derek McGlynn	SD-C401-CDP25-594 – Rupert Fuller
SD-C401-CDP25-611 – Niamh Power	SD-C401-CDP25-613 – Liam Bartley	SD-C401-CDP25-625 – Kevin Murtagh
SD-C401-CDP25-627 – Siobhan Casey	SD-C401-CDP25-635 – Ruairi Quinn	SD-C401-CDP25-637 – Elizabeth Quinn
SD-C401-CDP25-642 – Sinéad Mcintyre	SD-C401-CDP25-648 – Diane Grogan	SD-C401-CDP25-653 – Sarah Ann Mulqueen
SD-C401-CDP25-661 – Geraldine Walsh	SD-C401-CDP25-662 – Kieran Hallinan Hallinan	SD-C401-CDP25-673 – Sinead Donnelly
SD-C401-CDP25-683 – Paul Douglas	SD-C401-CDP25-684 – Davina Monahan	SD-C401-CDP25-685 – Ronan Brannigan
SD-C401-CDP25-686 – Colm Doyle	SD-C401-CDP25-687 – Esther Monahan	SD-C401-CDP25-688 – Andrew Tully
SD-C401-CDP25-693 – Naomi Anderson	SD-C401-CDP25-704 – Lucy Jordan	SD-C401-CDP25-712 – Neil Homan
SD-C401-CDP25-715 – Peter McCabe	SD-C401-CDP25-718 – Mary McCabe	SD-C401-CDP25-720 – Sophie Dennehy
SD-C401-CDP25-721 – Philip Dennehy	SD-C401-CDP25-723 – Norman Carroll	SD-C401-CDP25-725 – Norman Carroll
SD-C401-CDP25-735 – Bernie Murtagh	SD-C401-CDP25-740 – Ann Nealon	SD-C401-CDP25-743 – Paula McMahon
SD-C401-CDP25-750 – Pauline Bligh	SD-C401-CDP25-751 – Mary Anderson	SD-C401-CDP25-753 – Joseph Bligh

SD-C401-CDP25-756 – Pádraic Slavin	SD-C401-CDP25-761 – Yvonne Brannigan	SD-C401-CDP25-772 – James Grogan
SD-C401-CDP25-776 – Mary Whittle	SD-C401-CDP25-777 – Little Folk Preschool	SD-C401-CDP25-783 – Sarah Owen
SD-C401-CDP25-822 – Amanda Whelan	SD-C401-CDP25-837 – Ken Goodwin	SD-C401-CDP25-847 – Grace Lavery O'Reilly
SD-C401-CDP25-848 – Eithne Richardson	SD-C401-CDP25-849 – Adrienne Sullivan	SD-C401-CDP25-873 – Patrick O'BRIEN
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-878 – Paul&Linda McKenna	SD-C401-CDP25-883 – Eoin McDonagh
SD-C401-CDP25-884 – Dermot Keogh	SD-C401-CDP25-887 – Nina Healy	SD-C401-CDP25-895 – Heather Hallinan
SD-C401-CDP25-903 – Anne Marie Brady	SD-C401-CDP25-906 – Brendan Hanley	SD-C401-CDP25-912 – glenn roche
SD-C401-CDP25-931 – Pat OKeeffe	SD-C401-CDP25-938 – Leon Donovan	SD-C401-CDP25-949 – Marian Henry
SD-C401-CDP25-954 – Elaine McConnell	SD-C401-CDP25-956 – Jennifer Begley	SD-C401-CDP25-967 – Matt Lavery-O'Reilly
SD-C401-CDP25-989 – Louise Brogan	SD-C401-CDP25-1005 – John Green	SD-C401-CDP25-1034 – Aileen Ennis
SD-C401-CDP25-1041 – Transport Infrastructure Ireland	SD-C401-CDP25-1050 – Aileen Ennis	SD-C401-CDP25-1065 – Patrick Gunning
SD-C401-CDP25-1079 – Orla Duke	SD-C401-CDP25-1088 – Una Duke	SD-C401-CDP25-1095 – Mary Heery

SD-C401-CDP25-1111 – Ronan Duke	SD-C401-CDP25-1140 – Nigel Place	SD-C401-CDP25-1159 – David Whittle
SD-C401-CDP25-1169 – Tina Brady	SD-C401-CDP25-1174 – Aine Maguire	SD-C401-CDP25-1178 – Alecia McSweeney
SD-C401-CDP25-1202 – Celine Kiernan	SD-C401-CDP25-1214 – Andrew Dunne	SD-C401-CDP25-1239 – Cllr. Helen Farrell
SD-C401-CDP25-1241 – Derek Roche	SD-C401-CDP25-1246 – Deborah kiernan	SD-C401-CDP25-1260 – David Kinsella
SD-C401-CDP25-1269 – Deirdre McIntyre	SD-C401-CDP25-1270 – Marcel Notenboom	SD-C401-CDP25-1271 – Karen Kinsella
SD-C401-CDP25-1297 – Audrey Smith	SD-C401-CDP25-1314 – Miriam Whittle	SD-C401-CDP25-1325 – Siobhan Nolan
SD-C401-CDP25-1329 – Michelle Whelan	SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1359 – Elizabeth Cuddy
SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1380 – Aoife Slattery
SD-C401-CDP25-1384 – Grainne Slattery	SD-C401-CDP25-1412 – Elaine Collins Collins	SD-C401-CDP25-1416 – Thomas Henry
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1449 – Marie Murphy
SD-C401-CDP25-1450 – Edina Almasi	SD-C401-CDP25-1456 – Donal Curran	SD-C401-CDP25-1502 – daa
SD-C401-CDP25-1507 – Karina ODonnell	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1523 – Kevin Farrell

SD-C401-CDP25-1525 – Gary Connolly	SD-C401-CDP25-1528 – Johanne Monahan	SD-C401-CDP25-1532 – John Gobbett
SD-C401-CDP25-1535 – Elaine Chapman	SD-C401-CDP25-1558 – Genevieve Hennessy	SD-C401-CDP25-1568 – Gary Conlon
SD-C401-CDP25-1580 – Edel Mooney	SD-C401-CDP25-1581 – Bryan Kealy	SD-C401-CDP25-1591 – DEASUN O BROIN
SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1597 – Cllr Vicki Casserly	SD-C401-CDP25-1600 – Agnieszka Trzos
SD-C401-CDP25-1618 – Paddy Keating	SD-C401-CDP25-1619 – Darragh Begley	SD-C401-CDP25-1636 – Maria Guerriero
SD-C401-CDP25-1643 – Tara Ryan	SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1666 – Shane Moynihan TD
SD-C401-CDP25-1706 – Maura O'Keeffe	SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1710 – Ruth Curran
SD-C401-CDP25-1715 – Maria Murphy	SD-C401-CDP25-1717 – Jonathan Roach	SD-C401-CDP25-1722 – Patricia Mac Manus
SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1754 – Kenneth Lavin	SD-C401-CDP25-1772 – Philip Curran
SD-C401-CDP25-1792 – Teresa Duggan	SD-C401-CDP25-2001 – Ben O Byrne	SD-C401-CDP25-2432 – Katie Murnaghan

Summary	CE Response

A number of submissions outline the reasons why a land parcel (c. 1.18ha.) located at Foxhunter, Ballydowd (currently zoned Objective 'RW'), should not be considered as part of the proposed variation to the SDCC County Development Plan. **Overview** A large volume of submissions were received in respect of the proposed rezoning for lands at the Foxhunter (Amendment No. 14). Many submissions were identical or near-identical in content, signed by multiple residents of the area, and a large number of standardised individual submissions. The submissions are therefore summarised thematically below for ease of reference and response. **Overdevelopment – Lucan Wide Cumulative Impact** Overdevelopment and disproportionate levels of development have been flagged as issues throughout the consultation submission received by SDCC. Key issues raised include: Disproportionate levels of zonings in certain areas (e.g. Lucan) Certain sites may be omitted from the proposed variation (e.g. Finnstown, Foxhunter, St. Edmunsbury etc.) Further to this, incorrect baseline figures and analysis have been suggested in submissions and used to undertake capacity audit . Additionally, it is also stated that adequate zoned land already exists within the county to meet current demand, contrary to capacity audit . The proposed variation is also	This amendment is in relation to the designation of lands at the Foxhunter, Ballydowd that are currently zoned Objective 'RW' to 'RES' under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028. The land parcel in question is c. 1.18ha. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted CDP. The NPF Implementation Guidelines. required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the

suggested to undermine the SDCC own development plan. The topic of 'Overdevelopment' is dealt with in each of the various variation sites throughout this report, however, in a broader sense, the wider context is dealt with in some detail below to allow for wider consideration, notably in the comparative context of Lucan and Waterford, as well as how sites were selected. Submissions also raise consistent and strongly expressed concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by rapid population growth, disproportionate housing delivery, and inadequate supporting infrastructure. Residents emphasise that Lucan has undergone significant expansion over several decades, with population growth increasing from a small village of a few thousand in the 1980s, to approximately 15,000 by 1990, 57,000 by 2016, and circa 65,000 by 2026, largely driven by continuous residential development. This growth is frequently compared to that of a city, with Lucan now described as having a population broadly comparable to Waterford City, but without appropriate infrastructure, services or facilities. Concerns are further raised regarding density, noting that Lucan accommodates a similar population within	shared goals in the NPF, RSES and CDP in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county.

a significantly smaller land area, resulting in a markedly more intense urban form. A key theme is the perception that Lucan and Adamstown have absorbed a disproportionate share of housing development within South Dublin, including the delivery of two Strategic Development Zones (Adamstown and Clonburris), with submissions highlighting that this is unique nationally. It is also noted that 64% of lands identified for additional development under Proposed Variation No. 2 are located within the Lucan–Adamstown area, reinforcing concerns regarding imbalanced spatial distribution of growth. The cumulative pipeline of development is considered substantial, with thousands of units already delivered and significant additional capacity (including SDZ build-out lands and proposed rezonings) yet to be realised, potentially resulting in a further major increase in population. Submissions consistently assert that this level of growth has outpaced the delivery of critical infrastructure and services, resulting in existing deficits across multiple sectors. Transport infrastructure is identified as a primary constraint, with references to chronic congestion on the N4, Newcastle Road, Adamstown Road, R120 and within Lucan Village, where traffic is described as persistent throughout the day rather than limited to peak periods. Public transport is considered	**Overdevelopment – Lucan Wide Cumulative Impact** Submissions raise consistent and strongly held concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by cumulative population growth, a concentration of housing delivery, and infrastructure provision not keeping pace with development. The Planning Authority acknowledges that the Lucan–Adamstown area has experienced significant and sustained population growth over several decades, evolving from a small settlement into a major suburban population centre within the Dublin Metropolitan Area. The area forms part of a key growth corridor within the Dublin Metropolitan Area, where the availability of suitable and serviceable lands, including those proximate to existing and planned transport infrastructure, has been identified at regional and national level as critical to meeting housing demand. A central concern relates to the cumulative impact of development, with submissions asserting that population growth has outpaced the provision of critical infrastructure. Concerns relating to congestion on key transport routes, public transport capacity, and pressure on schools, childcare, healthcare and community facilities are recognised as part of the cumulative impact of growth in the area. Specific issues include traffic congestion on key routes such as the N4, Adamstown Road, Newcastle Road and within Lucan Village, alongside constraints in public transport capacity, including overcrowded bus services and reliance on future rail interventions. Submissions also highlight pressure on social infrastructure, including school places, childcare provision, healthcare services and community facilities, with references to oversubscription and capacity constraints. In addition,

insufficient and unreliable, with overcrowded bus services, lack of rail or Luas connectivity, and the absence of a direct link to Dublin Airport highlighted as key failings. The projected growth associated with further rezonings is considered likely to exacerbate car dependency, congestion and associated environmental impacts. Similarly, significant pressure is identified on social infrastructure, including school capacity, childcare provision and healthcare services. Submissions refer to school place shortages, oversubscribed facilities, and limited GP availability, with many practices reportedly not accepting new patients. Community, recreational and sports facilities are also considered deficient relative to the size of the population, with recent examples cited of facilities reaching capacity shortly after opening. This is compounded by concerns regarding utilities and drainage infrastructure, with suggestions that some systems are already approaching or exceeding operational capacity. A further critical issue is the loss of remaining greenfield and high-amenity lands, particularly at locations such as St. Edmundsbury, Finnstown and other proposed sites. These lands are described as important for biodiversity, landscape character, recreation, and climate resilience, as well as forming part of the wider Liffey Valley green infrastructure network.	concerns are raised regarding the loss of greenfield lands and high-amenity areas, which are viewed as important for environmental quality, recreation and biodiversity. Submissions also raise concerns that a disproportionate quantum of lands identified under the proposed variation are located within the Lucan–Adamstown area. The Planning Authority acknowledges the perception that a disproportionate share of future development is directed to the Lucan area; however, the identification of lands is not based on geographic distribution, but on a rigorous, evidence-based assessment of suitability, infrastructure capacity, accessibility and alignment with national planning policy. In this regard, the availability of suitably located lands within the Dublin Metropolitan Area, including in Lucan–Adamstown, is a key factor in accommodating projected population growth. Submissions frequently draw comparisons with Waterford City to illustrate the scale of population growth; however, the Planning Authority considers that such comparisons require careful contextualisation. Waterford is designated under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) as a Regional City of Scale, with a defined Metropolitan Area Strategic Plan (MASP) and a clear national policy objective to achieve significant population growth supported by targeted investment in infrastructure, regeneration and metropolitan-scale services. By comparison, the Lucan–Adamstown–Palmerstown area forms part of the wider Dublin Metropolitan Area, where growth is planned and distributed across the region in accordance with national housing targets and strategic planning policy, and where the availability of land

Their rezoning is viewed as contributing to the progressive erosion of natural and environmental assets in an area already experiencing extensive urbanisation. Overall, the issue of overdevelopment is framed in terms of cumulative impact, with submissions arguing that continued rezoning, in advance of infrastructure delivery, represents a "housing-led" rather than "infrastructure-led" approach. The prevailing concern is that further development will intensify existing deficits, leading to declines in quality of life, increased congestion and environmental pressure, and an erosion of local character and community cohesion, unless balanced by timely and proportionate investment in infrastructure and services. **Overdevelopment and Phasing** A number of submissions raise significant concern that the proposed rezoning at Foxhunter, in conjunction with the other variation lands, would result in excessive and unsustainable levels of development within the immediate and wider Lucan area. It is emphasised that the cumulative impact of existing and permitted development, including the development of Adamstown SDZ and Clonburris SDZ, will place significant pressure on existing physical and social infrastructure.	and proximity to transport corridors are key determinants in shaping development patterns. The revised NPF provides for substantial population growth within the Eastern and Midland Region, reflecting Dublin's role as the primary engine of national population growth, while also supporting higher relative growth in regional cities to achieve balanced regional development. In this context, the Planning Authority considers that the proposed variation responds to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land be identified to meet increased and accelerated housing demand. Submissions question the necessity of proposed rezonings, with reference to the housing capacity identified in the South Dublin County Development Plan 2022–2028. While it is acknowledged that the Development Plan identified a substantial quantum of zoned land, subsequent to its adoption there have been significant changes in national planning policy, including the revised NPF and associated Section 28 Ministerial Guidelines. These guidelines require planning authorities to review their Core Strategy and zoning provisions to ensure alignment with updated housing targets and delivery requirements. In response, the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. This process included engagement with key internal departments and relevant infrastructure providers to ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development.

It is contended that residential development, at the subject lands, would exacerbate the wider areas capacity to absorb additional population, in terms of services and infrastructure. Submissions further state that the concentration of the proposed rezonings within the wider Lucan area, represents an unequal distribution of development, when compared relative to other proposed locations within South Dublin County. Submissions request that any further development, including at the subject lands, should be deferred until supporting infrastructure has been delivered. Particular emphasis is placed on the need for transport infrastructure upgrades, including the delivery of the DART+ South West, in advance of any rezoning or development. **Environment, Biodiversity and Green Infrastructure** Several submissions state that the Foxhunter lands form part of a wider landscape associated with the Liffey Valley Corridor, which is an identified Green Infrastructure (GI) corridor within the CDP. Several submissions emphasise the importance of supporting and enhancing the GI network and local biodiversity, it is expressed that development at this location would disrupt and diminish the aforementioned.	The sites identified under the proposed variation were selected on the basis of this evidence-based assessment, having regard to their proximity to existing and planned infrastructure, their capacity to support appropriate densities, and their alignment with compact growth and transport-oriented development principles. Importantly, future development is not unstructured but will be coordinated through the application of site-specific Specific Local Objectives (SLOs) and the Development Plan framework. Zoning represents a strategic first step and does not, in itself, facilitate immediate development. The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations. The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. In this way, SLOs provide a structured mechanism to ensure that development is aligned with available or planned infrastructure and proceeds in a coordinated manner. Furthermore, the SLOs ensure that development proposals are subject to detailed assessment and coordination, thereby avoiding piecemeal or uncoordinated development and ensuring that infrastructure requirements, including transport demand, are clearly identified and addressed at the appropriate stage. The Council has also delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. These investments demonstrate the Council's ongoing commitment to

A number of submissions express any potential development at the subject lands, would give rise to significant environmental impacts, particularly in relation to air quality and noise. Concern is expressed that continuous exposure to traffic and congestion along the N4, would exceed acceptable standards for residential development. It is stated that mitigation measures, would be insufficient to address these potential impacts, and would not protect the existing residential amenity. **Community and Social Facilities** Several submissions raise concern regarding the capacity of existing community and social infrastructure within the Lucan area. Submissions highlight limited access to GP and primary health care services, increased waiting times for Childcare facilities and community facilities. It is stated that additional development, at the subject lands, would place further pressure on existing services. A number of submissions refer to the subject site's location and configuration, detailing that it would be suitable for community or healthcare provisions, which would be not applicable if the subject lands are zoned for residential development.	aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone (SDZ) framework represents best practice in the coordinated delivery of large-scale residential communities. These areas have been planned and phased to provide for the delivery of community facilities, transport infrastructure and open space in tandem with population growth. This approach reflects a coordinated, urban design-led model of development, promoting the efficient use of land and supporting transport-oriented development. The experience of the SDZs has informed the Council's approach to future growth, and the Planning Authority will continue to apply and reflect on the lessons learned to ensure that development is delivered in a coordinated and sustainable manner. The delivery of infrastructure such as DART+ South West, BusConnects and active travel networks provides the basis for improved sustainable mobility within the wider area. It is recognised that public transport service provision and service levels are a matter for the National Transport Authority (NTA) and relevant operators. The Planning Authority will continue to engage with the NTA and other stakeholders to ensure that future transport demand arising from population growth, including that facilitated by these rezonings, is planned for and responded to in a coordinated manner, aligned with national and regional transport strategies. The zoning approach for

Access, Housing and Density A number of submissions raise concern regarding the potential scale, height and density of development that could arise from the proposed rezoning. Several submissions express concern that any future development on the subject lands, could lead to high-density proposals, including tall buildings, which are considered to be visually inappropriate and out of character with the surrounding area. A submission raises concern regarding the type and tenure of housing to be delivered on the lands, it is stated that a high-rise apartment scheme would only cater for short term rental occupation and not support the cohesion of the existing residential community. In addition, submissions refer to the planning history of the site, noting that previous applications for residential development have been refused by An Coimisiún Pleanála (formerly An Bord Pleanála), and that those decisions demonstrate the lands are not suitable for residential development. A number of submissions request the inclusion of a Specific Local Objective (SLO) - that there will never be any access through Hermitage Gardens and Hermitage Park for the subject lands. It is stated that such measures are necessary to protect residential	lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated district and neighbourhood transport assessments. This will inform detailed engagement with both elected members and national transport agencies on future transport options and potential projects. This study will develop a transport strategy. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. While the cumulative nature of development in the Lucan–Adamstown area is acknowledged, it is managed through ongoing coordination of land use, infrastructure planning and delivery. In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools, health care, and transport services by relevant agencies. As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is

amenity, and that any rezoning should explicitly retain or strengthen these elements. **Employment and Retail** A number of submissions raise concern regarding the loss of employment lands, due to the proposed rezoning of the subject lands from 'RW' to 'RES'. A number of submissions emphasise that retaining the 'RW' zoning objective would facilitate job creation, thereby supporting a more balanced pattern of development in the immediate area. It is stated that maintaining employment based uses on the subject lands, adjacent to the N4, would reduce the need for long distance commuting and support sustainable travel patterns. Several submissions raise concern that an increase in housing without corresponding employment provisions would exacerbate an existing imbalance between where people live and work. **Parking** A number of submissions state that existing residential areas such as Hermitage Park and the surrounding estates, are already experiencing pressure on parking capacity and that additional development on the subject lands would exacerbate this issue.	known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. The Planning Authority will continue to engage with relevant agencies to align future development with the timely delivery of supporting infrastructure. Overall, the concerns raised regarding overdevelopment, infrastructure capacity and quality of life are acknowledged. However, the Planning Authority is satisfied that the proposed variation is grounded in national policy, statutory requirements and a coordinated development framework. The approach seeks to balance the need to accommodate ongoing population growth within the Dublin Metropolitan Area—supported by the availability of suitable lands—with the delivery of infrastructure, sustainable transport integration and the principles of compact, transit-oriented development, while contributing to broader national objectives of balanced regional growth. **Overdevelopment and Phasing** The Planning Authority notes the range of issues raised in submissions relating to phasing, policy compliance, overdevelopment, density and housing in the context of the proposed zoning (Amendment No. 14), as well as the wider Lucan area. These matters are interrelated and have been considered in a holistic manner, having regard to national and regional planning policy, the statutory framework of the 2 No. SDZ

Several submissions raise concern that insufficient on-site parking at the subject lands, would result in overspill parking into adjoining estates, in particular Hermitage Park. This increase in on-street parking would reduce accessibility, obstruct footpaths and cycle routes, and disrupt residential amenity. **Parks and Open Space** Several submissions highlight that the subject lands are an informal green space and local amenity for surrounding residents. **Public Transport** A number of submissions raise concern regarding the adequacy, capacity, and reliability of public transport services serving the Lucan area. Submissions state that existing bus services are operating at or near capacity, particularly during peak hours, resulting in overcrowding and passengers unable to board. Furthermore, railway services are limited in accessibility for parts of Lucan, resulting in heavy reliance on the bus services. Several submissions indicate that upgrades are required to support any additional population growth. A lack of committed or short term solutions for public transport infrastructure, including delivery of major projects such as DART+ South West and Luas extensions, does not provide immediate relief solutions to support the existing demand.	Planning Schemes, and the provisions of the South Dublin County Development Plan 2022–2028. The Planning Authority acknowledges the number of submission's reference to a systems-thinking approach, which emphasises the interrelationship between land use, infrastructure, environmental protection and community wellbeing. It is considered that this approach is reflected in the preparation of the proposed Variation, which has been informed by the Strategic Environmental Assessment, Appropriate Assessment, infrastructure capacity assessments, and extensive engagement with both internal departments and external agencies (including the NTA and Uisce Éireann). The Variation forms part of a broader, plan-led framework, aligned with the Revised National Planning Framework and Regional Spatial and Economic Strategy, which explicitly integrate housing delivery with environmental protection, climate resilience, transport investment and infrastructure provision. **Environment, Biodiversity and Green Infrastructure** The Planning Authority notes concern regarding the location of the subject site and the potential impact of development on the wider Liffey Valley Green Infrastructure (GI) corridor, impacts on biodiversity and environmental quality. Notwithstanding this, it is considered that the subject lands, at this moment in time, align with national definitions of brownfield land, as set out in the Sustainable Residential Development and Compact Settlements Guidelines (2024) (Appendices - A).

A number of submissions request the inclusion of a Specific Local Objective (SLO) - that Dart West and Dart Southwest must be operational before any rezoning development is approved. A number of submissions also highlight a lack of direct public transport connection to key destinations, in particular Dublin Airport. A submission was received from the National Transport Authority (NTA), the NTA notes the proposals to rezone a large number of sites throughout the County. It is the view of the NTA that those sites to the north at Lucan and Liffey Valley, additional to Finnstown Castle, Adamstown West and Tubber Lane, are well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. The sites at St. Edmundsbury (sic), Liffey Valley and Coldcut are served by a variety of radial and orbital services while the site at the Foxhunter could potentially be served effectively by the same services, subject to details of any emerging development proposal. **Schools** A number of submissions raise concern regarding the operational capacity of primary and secondary schools in the Lucan area. Furthermore, it is highlighted that significant distances are being made	Accordingly, biodiversity and green infrastructure will be carefully considered ensuring that GI features are appropriately protected, integrated and, where possible, enhanced through a robust, plan-led assessment process in line with national, regional and local policy objectives. Any future development proposal(s) will be brought forward through a planning application, informed by detailed environmental assessment, and site-specific ecological studies in accordance with the current requirements of the CDP. In relation to concerns regarding air quality and noise, including proximity to the N4, these matters will be subject to detailed assessment at planning application stage, including where required, environmental and technical assessments to ensure that development complies with applicable standards in accordance with the CDP, and does not give rise to unacceptable impacts on existing and/or future residential amenity. It is noted that residential development is proximate to the N4 at locations adjacent to the subject lands. **Community and Social Facilities** The Council notes the concerns raised in submissions regarding the capacity, delivery, and coordination of community and social infrastructure within the wider Lucan area, including delays in the provision of facilities and pressures arising from ongoing population growth. The Council has recently improved community and social infrastructure in the wider area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and

by students, due to availability and associated catchment areas. **Traffic and Roads** Several submissions highlight that the existing road network in the wider Lucan Area, including the N4 and R136, is already operating at or beyond capacity and cannot accommodate additional traffic arising from further residential development. Concerns are raised regarding key junctions and routes, including the N4 slip road and connections to Lucan Village, with submissions indicating that additional traffic would exacerbate the operation of same. In this regard, a number of submissions request the inclusion of a Specific Local Objective (SLO) - that an orbital ring road MUST be completed and operational before any further development is approved for Lucan and Adamstown. Several submissions place emphasis on local residential streets, including Hermitage Gardens and Hermitage Park, as unable to accommodate vehicular movement via the subject lands. Submissions highlight that any access through same, would result in increased traffic volumes and heighten any potential risk to pedestrians.	opening of Lucan House, the continued development of Griffeen Park, extending into Clonburris, the Grand Canal Greenway, and the delivery of community, recreational and childcare facilities through SDZ Planning Schemes. In response to the zoning of lands, the Council will adapt current strategies and bring forward future capital projects. The South Dublin County Development Plan 2022–2028 (CDP) provides a clear and structured framework for ensuring that infrastructure provision aligns with population growth. Chapter 8 (Community Infrastructure and Open Space) sets out defined standards for schools, childcare, healthcare, community centres and open space, informed by a Social / Community Infrastructure Audit (SIA). These standards are applied to all new development areas to ensure that future demand is identified and addressed in a systematic manner, including the application of population-based thresholds for educational and community facilities. SDCC will continue to promote, engage and facilitate the work of the HSE in the delivery of health services. Furthermore, it is noted that community and healthcare uses are permissible and/or open for consideration, under the proposed Zoning Objective ‘RES’ in accordance with the CDP (Chapter 12, Table 12.2). **Access, Housing and Density** Concerns regarding density and building height are noted. Residential density is guided by national policy, particularly the Sustainable Residential and Compact Settlement Guidelines (2024), which require efficient use of well-located land proximate to services and public transport.

In this regard, submissions request for a traffic and transport assessment, in advance of any rezoning, detailing that development should not proceed without clear evidence that the road network can accommodate additional demand. A submission was received from the Transport Infrastructure Ireland (TII), with a recommendation with regard to the Foxhunter Site: *In the interests of maintaining the safe and efficient operation of the national roads network and in consideration of the safety and amenity of future residential occupants in accordance with official national road policy and public safety; TII recommends that this proposed rezoning is premature pending a evidenced review which identifies and addresses mitigations and measures for both the management of the safety and operation of the national road network and protection of the amenity of future residential occupants at this location.* **Utilities, Water and Wastewater** Several submissions raise concern regarding the capacity of existing utilities serving the immediate to wider area. It is highlighted that current systems, including drainage and utility networks, are under significant pressure and that there are no planned upgrades to support the subject lands.	Detailed matters such as density, height and layout will be determined at planning application stage, having regard to applicable national guidance and Development Plan standards. Any proposals must demonstrate high-quality design and appropriate integration with surrounding areas. The Planning Authority notes that the zoning of lands for residential use, does not predetermine housing typology or tenure mix. In relation to concerns regarding previous refusals on the subject lands by An Coimisiún Pleanála (ACP), formerly An Bord Pleanála (ABP), it is noted that each application is assessed on its own individual merits, having regard to the policy context and material considerations at time of determination and does not prejudice the appropriate function of rezoning lands itself. The request for an SLO, on the subject lands, prohibiting access through adjoining residential areas is noted. However, it is considered that matters relating to access arrangements can be appropriately addressed at planning application stage, where detailed assessment of vehicular and pedestrian connectivity, safety and residential amenity can be undertaken. The Planning Authority does not consider a SLO limiting the access options appropriate. **Employment and Retail** The concerns raised regarding the 'RW' zoning objective, and the potential loss of employment provision is noted. Notwithstanding this, having regard to the nature and scale of the subject lands, it is considered that the lands by virtue of their location, directly adjacent to residential development, are better suited for

A submission was received from Uisce Éireann (UÉ), formerly Irish Water (IW), In relation to the Foxhunter site. UÉ have indicated that development of the lands is '*Feasible without upgrades*' A submission was received from Electricity Supply Board (ESB), with regard to the overall variation, having no site specific objections to the variation, ESB concluded the following: *ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly:* • *Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the level of operational activities ongoing at our high-voltage substations within South Dublin are protected* • *A collaborative partnership between South Dublin County Council and ESB to proactively identify and secure appropriate sites for the development of essential energy infrastructure will allow both organisations to*	similar development consistent with the provisions of the Revised NPF and associated guidelines. Furthermore, it is noted that residential, employment and retail uses are permissible and/or open for consideration, under the proposed Zoning Objective 'RES' in accordance with the CDP (Chapter 12, Table 12.2) and employment uses or a mixed use approach can be facilitated. **Parking** The Planning Authority notes concern regarding parking pressure and potential overspill into surrounding areas. The approach to car parking in the County is directly informed by national planning policy and reflects a clear shift towards supporting sustainable transport and reducing reliance on the private car. The South Dublin County Development Plan 2022–2028 adopts maximum (not minimum) car parking standards, which are applied on a location-based, accessibility-led approach. These standards vary across the County depending on access to public transport and services. National policy, particularly the Sustainable Residential Development and Compact Settlements Guidelines (2024), reinforces this approach and introduces Specific Planning Policy Requirements (SPPRs) which planning authorities are required to apply. These guidelines provide that: • Car parking provision should be reduced at all urban locations; • In areas with good access to public transport and services, parking should be minimised, substantially reduced or, where appropriate, omitted;

plan proactively, identify a viable strategic site, and ensure infrastructure keeps pace with the county's long-term growth objectives. • *ESB respectfully requests that due consideration is given to the need for critical upgrades and capacity enhancements across South Dublin, as these are essential to address current grid constraints, support renewable energy integration, and enable sustainable residential and industrial growth.* • *Ensuring that public utilities are permissible under all zoning objectives is critical to enabling timely, efficient delivery of network capacity upgrades and supporting sustainable local growth and climate goals.* • *Recognising the opportunities for early engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways and the provision of ducting/underground cabling.* **Zoning, Policy and Red Line Boundary** A number of submissions detail that the Revised National Planning Framework (NPF), and its associated National Strategic Outcomes (NSOs), seek to promote compact growth, protect amenity and heritage, climate mitigation and sequence development with infrastructure.	• Parking standards are expressed as maximum allowable levels, and proposals must justify the level of parking provided Parking provision is assessed at planning application stage, where it must be demonstrated that adequate parking is provided in accordance with the standards set out in the CDP and relevant national guidance. Where necessary, mitigation measures and parking management will be required to ensure that adjacent residential amenity, pedestrian movement and accessibility are protected. The Council does not consider it necessary to amend or create a new SLO for the site with regard to parking arrangements. **Parks and Open Space** The Planning Authority acknowledges the lands may function as an informal open space. However, it is noted that that the subject lands largely comprise of underutilised brownfield lands in private ownership and do not function as public open space. The CDP and relevant national guidance require that all residential development, incorporates appropriate levels of public and private open, and contributes to the wider open space and green infrastructure network. Any future proposals, at planning application stage, will therefore be required to demonstrate that sufficient, high-quality and accessible open space is provided, for future residents and to contribute to the surrounding area. **Public Transport** The Planning Authority acknowledges concerns regarding public transport capacity, frequency and reliability, including bus overcrowding

Submissions raise concern that the proposed rezoning, at the subject lands, is inconsistent with the NSO's and contradicts same. Separately, a number of submissions raise concern regarding the inclusion of the Foxhunter Pub; clarification is sought from the Planning Authority to confirm whether the building is included and if it is a protected structure. **Aviation Safeguarding** A submission was received from the Dublin Airport Authority (DAA), this is summarised as follows; The submission specifically addresses two sites proposed for residential zoning under the variation, namely St. Edmundsbury (Amendment Ref. No. 6) and Foxhunter (Amendment Ref. No. 14). DAA highlight that both sites are located within Noise Zone D for Dublin Airport, as well as within the Noise Abatement Objective (NAO) contours identified by the Aircraft Noise Competent Authority (ANCA). DAA draw attention to the importance of land-use planning controls as a core element of the Balanced Approach under EU Regulation 598/2014, noting that policy objective DAO-11 of the Fingal Development Plan 2023 seeks to strictly control new residential development within airport noise zones and to require appropriate noise insulation where development is permitted.	and rail constraints. Engagement with the NTA and relevant stakeholders is ongoing in respect of strategic projects such as DART+ South West and BusConnects, which are critical to enhancing capacity and supporting modal shift in the wider Lucan area. In this regard, The NTA has indicated that the sites at St. Edmundsbury, Liffey Valley and Coldcut are served by a variety of radial and orbital services and that the site at the Foxhunter could potentially be served effectively by the same services, subject to details of any emerging development proposal. In this context, it is noted that St. Edmundsbury and by extension the Foxhunter lands are well served by public transport and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. This view from the NTA is noted and welcomed. Consideration will be given, at planning application stage, to the potential for impacts on adjoining residential areas. Where necessary, mitigation measures will be required to ensure that adjacent residential amenity, movement and accessibility are not adversely affected. The request for an SLO, on the subject lands, linked to the development and operation of the Dart Southwest is noted. Having regard to the nature and scale of the subject lands, its location in the County, and proximity to existing and/or planned Bus corridor schemes (as indicated by the NTA), it is considered that the inclusion of an SLO to this effect is not appropriate in this instance. **Schools** The concerns raised regarding the capacity of primary and secondary schools within the Lucan area are acknowledged.

While DAA have no objection in principle to residential development at these locations, subject to the achievement of acceptable residential amenity, they highlight the potential for future conflict with the Dublin Airport NAO. In particular, DAA note that the NAO is assessed on the basis of population exposure within the 45 dB Lden and 40 dB Lnight contours, and that these calculations are not adjusted to reflect the presence of noise insulation. As a result, any additional residents within these contours would increase the numbers of population classified as Highly Annoyed (HA) and Highly Sleep Disturbed (HSD), potentially impacting the achievement of the NAO and the operational resilience of Dublin Airport. The DAA request that this issue be explicitly addressed in the assessment of Proposed Variation No. 2, given the central role of land-use planning in managing aircraft noise impacts. They also request that any rezoning within designated Airport Noise Zones include robust policy safeguards, specifically: Mandatory noise insulation measures appropriate to the level of aviation noise exposure; and clear notification requirements to prospective purchasers and/or occupiers regarding the location	A submission was received from the Department of Education and Youth (DOEY), with a recommendation with regard to the Foxhunter Site, the Department have indicated that there will be a need for an additional 24 classroom primary school and a 32 classroom secondary school to cater for the increase in the wider Liffey Valley area, within which the subject site has been included in for school place planning. **Traffic and Roads** The concerns raised regarding traffic congestion, road capacity and the status of the existing network, including the N4 and R136, to accommodate additional demand are acknowledged. The Chief Executive is advancing a West of County Transport Strategy to address longer-term movement capacity and infrastructure requirements across the western part of the County, including the Lucan area. At a local level, the Council is actively optimising the performance of the existing road network through a range of measures. These include the operation the Traffic Management Centre, coordinated signal control systems and the deployment of real-time traffic detection technology to dynamically manage flows. A structured programme of traffic signal upgrades and asset management is underway, alongside ongoing junction improvements, pedestrian crossing upgrades and traffic calming measures. These interventions are complemented by school safety and active travel programmes which reduce peak demand.

of dwellings within an Airport Noise Zone and associated elevated levels of aircraft noise.	Active travel is a core component of transport policy in Lucan. Active travel reduces congestion by directly removing short car trips from the network, particularly at peak times when capacity constraints are most acute. Even modest reductions in peak traffic volumes can significantly improve network performance and junction efficiency. Walking and cycling also enable more efficient use of limited road space, increase the people-carrying capacity of corridors, and support public transport by reducing demand for car-based access trips. In addition, active travel facilitates more localised trip patterns, reducing the need for longer journeys on the strategic road network. Active travel is required to achieve national climate and modal shift targets, supports compact growth patterns, and provides an effective means of accommodating increased population without reliance on road capacity expansion. In this regard, a submission was received from the Transport Infrastructure Ireland (TII), with a recommendation with regard to the Foxhunter Site (Amendment No. 14): *In the interests of maintaining the safe and efficient operation of the national roads network and in consideration of the safety and amenity of future residential occupants in accordance with official national road policy and public safety; TII recommends that this proposed rezoning is premature pending a evidenced review which identifies and addresses mitigations and measures for both the management of the safety and operation of the national road network and protection of the amenity of future residential occupants at this location.*

	The Planning Authority acknowledges TII's role and recognises the importance of protecting the strategic function of the national road network, including the TEN-T Core and Comprehensive Networks. It is emphasised that the identification of the subject lands for residential development, does not give rise to an immediate development. Should any future redevelopment proposal(s) on the site arise, they would remain subject to a Transport and Traffic Assessment through the development management process and be required to meet the appropriate CDP Policies and Objectives. It is noted that the CDP contains a number of policy and objectives (Chapter 7 - Policy SM4, Policy SM6, Chapter 11 – Policy IE8, and Chapter 12 - Section 12.7.2), requiring that development proposals adjacent to and/or affecting national roads: • Demonstrate that the operation, safety and capacity of the national road network are not compromised • Avoid direct access onto national roads • Address noise, air quality, lighting and drainage impacts through appropriate mitigation It is considered that, subject to implementation of appropriate mitigation measures, traffic and road impacts can be satisfactorily considered as part of a planning application process. **Utilities** The concerns raised in submissions regarding the capacity of existing utilities, including water supply, wastewater and drainage infrastructure, are acknowledged.

	In this regard, UÉ has indicated that development of the Foxhunter lands is '*Feasible without upgrades*.' This position is noted and welcomed. In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing, can be provided in a resilient, sustainable manner, and that development does not proceed in advance of essential services being put in place. A submission was received from the ESB with regard the overall variation, having no site-specific objections to the proposed variation, SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals. **Zoning, Policy and Red Line Boundary** In relation to the Foxhunter Pub, the Planning Authority can confirm that the pub and associated lands are correctly identified, within the red line boundary, as per the published Book of Maps (February 2026). Furthermore, in the interest of clarity, this variation does not alter the use of the existing building, and the structure itself is not identified as a protected structure, as per CDP mapping. **Aviation Safeguarding** The Council notes the submission from the DAA, and reaffirms its position with regard to the application of Public Safety Zones (PSZs)

	under Policy IE14 of the CDP, including Inner and Outer PSZs, which restrict or prohibit development involving human occupancy in proximity to runway thresholds. These zones are specifically intended to protect public safety on the ground and will continue to apply to any future planning applications within the defined areas. With regard to Dublin Airport and the DAA submission, the Council notes that while South Dublin County lies approximately 10 km from the airport boundary and therefore experiences limited direct noise and safety impacts, the importance of Dublin Airport to the national economy and tourism is fully recognised. The relevant provisions of Policy IE11 (Dublin Airport), including limits on building height within the Outer Horizontal Surface and consultation with DAA and the IAA, will continue to be rigorously applied. Similarly, Policy IE13 (Noise) will guide the assessment of any noise-sensitive development within noise-affected areas, including requirements for appropriate noise assessment and mitigation. The Council also notes the request from both DAA plc (in relation to Dublin Airport Noise Zones) that future residential development within airport-influenced zones be carefully managed to avoid adverse consequences for both aviation operations and residential amenity. In this regard, and the DAA considerations through either: • the refinement of Specific Local Objectives (SLOs) associated with relevant variation sites; and/or • the application of clear GIS-based safeguarding and noise mapping layers, to be read in conjunction with Development Plan maps and applied consistently in the assessment of planning applications within, or in close proximity to, airport safeguarding zones.

	Such an approach would enhance clarity for applicants and the public, ensure early identification of aviation constraints, and reinforce the requirement for appropriate design responses, including noise mitigation and disclosure to prospective occupiers, where residential or other sensitive uses are proposed. Notwithstanding the above, the Council strongly supports the continued safeguarding of Weston Airport and Dublin Airport, as set out in the Development Plan. It is satisfied that the existing policy framework under Chapter 11.8 and Chapter 12 (Implementation and Monitoring) provides a robust and enforceable basis for managing development in proximity to aerodromes. Any future development proposals arising from Proposed Variation No. 2 will be assessed in full compliance with these policies, in consultation with the IAA, airport operators and other prescribed bodies, ensuring the protection of aviation safety, operational resilience, and residential amenity in the context of proper planning and sustainable development. Therefore, it is not considered necessary to add an SLO to reflect the DAA commentary for the subject lands, as the CDP provides adequate and appropriate safeguarding. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the

	county. The subject lands at the Foxhunter are appropriate lands to meet these objectives. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to Variation No. 2 (Amendment no. 14) of the South Dublin County Development Plan 2022-2028.	

AMENDMENT NO. 15 - NINTH LOCK ROAD

Existing

Proposed

Submission No.

SD-C401-CDP25-191 – nial Caffrey

SD-C401-CDP25-748 – Alan Furlong

SD-C401-CDP25-809 – Cllr Trevor Gilligan PC

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-1375 – Office of the Planning Regulator

SD-C401-CDP25-1442 – Paul Gogarty TD

SD-C401-CDP25-1676 – South Dublin Conservation Society

Summary	CE Response
Submissions address the proposed rezoning of lands at Ninth Lock Road (Amendment No. 15) from open space to residential use.	The lands subject to this proposed rezoning from open space to residential, often referred to as Letts Field, are located along the Ninth Lock Road (Amendment No. 15). The site is largely brownfield, in use as a fuel depot and currently accessed from Neilstown Road.

Zoning
A submission indicates that the proposed rezoning is very small when taken in isolation, but when you look at the size of the adjacent Clonburris SDZ, which does not have adequate amenities and infrastructure provided for in the plan, the use of the site as open space for community use would be more beneficial.
 	
Heritage
It is stated that there is no mention of the fact that Neilstown Lodge is a protected structure (No. 113 in the Record of Protected Structures) and borders the site of two monuments on the Record of Monuments - R149517 House - 16th/17th century Neilstown DU017-032002 and R149517 Castle - unclassified Neilstown DU017-032001.
 	
The Lodge needs protection as the last remnant of Neilstown House and its curtilage and any development here could impact negatively on it and any archaeological remains below ground.
 	
Water and Wastewater Infrastructure
The Uisce Éireann submission states that minor upgrades may be required but states that these can be developer driven.
 	
Public Poll
Results of an online public poll carried out by a local councillor were submitted in respect of a range of
	Along the Ninth Lock Road, an original entrance with timber lancet windows set within flanking screen walls of the entrance gateway to the former Neilstown Gate Lodge, is a protected structure (RPS Ref. 113) which lies within the south of the site.
	
	Zoning
	Reference to the inadequacy of amenities and infrastructure in the Clonburris SDZ planning scheme is noted. However, Section 4 of the Clonburris planning scheme includes a detailed phasing programme which is being adhered to. The phasing scheme requires the delivery of infrastructure in tandem with development. Delivery of the four key community buildings within the SDZ are progressing in line with the Scheme requirements. A high-level overview of Community Buildings delivery in tandem with Stages 7, 8 and 11 of the Scheme is set out below.
	
	• **Stage 7 – Kishoge Community Centre (Library**)
	  ○ Major civic facility providing library and flexible community spaces. Early design development is underway, with pre-planning expected shortly.
	• **Stage 8 – Clonburris Urban Centre (Arts Centre)**
	  ○ The flagship civic and cultural building for the SDZ, incorporating significant community and arts space. Initial design work is progressing, with pre-planning the next milestone.
	• **Stage 11b – District Park Hub (Sports Facility)**
	  ○ Sports and community hub within the District Park, including a sports hall and community room. Planning is already secured, and design refinement and value engineering are ongoing.

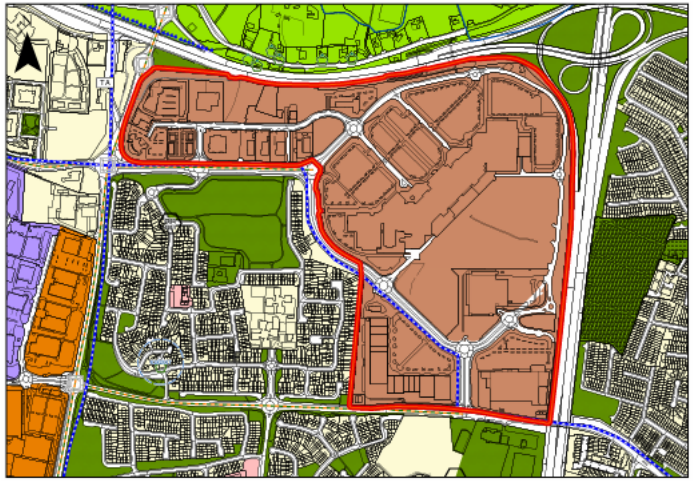
sites proposed to be rezoned as part of Variation No. 2. The results shown in the submission for the proposed rezoning at the Ninth Lock Road indicated 0 in favour, 11 against.	• **Stage 11c – Grand Canal Park Changing Facilities** Amenity building for the Grand Canal linear park, providing storage, toilet and changing facilities for allotments within the park. In the context of the potential for use of the Variation site for open space or community uses, it is noted that it is a brownfield site in use as a fuel depot for many years. There is currently no amenity benefit generated from this site. The proximity of the site to the Clonburris SDZ lands, located as it is on the opposite side of the Ninth Lock Road, provides potential for this site to benefit from the integrated land use and transport planning approach which the SDZ site will deliver as it is developed. An independently conducted online poll was recorded by way of a submission indicating the number of respondents who were for and against the rezoning, there being 11 No and 0 Yes. However, it is not known if any of the respondents' made submissions through the variation process. As such, the CE cannot respond further on the results or the reasons for them. **Heritage** The concerns raised regarding potential impact on the protected structure and the record of monuments and places within the Zone of Notification on the adjoining open space is noted. A fuel depot has been operating on the site for a lengthy period of time. Given that the site is bounded by the protected structure (entrance and gates to the former Neilstown Gate Lodge) any future development would have to demonstrate how these features and the gate lodge were protected. It is noted that the Gate Lodge itself has

	been added on to by structures associated with the existing business. The County Development Plan contains objectives which offer significant protection for built heritage and protected structures. A zone of notification is an area designated around archaeological sites that are protected under the National Monuments Acts. In this case the zone of notification lies within Neilstown Park outside the proposed area for rezoning. Nonetheless, any planning application on the lands would be referred to the Department Housing, Local Government and Heritage and their recommendations considered as part of the planning assessment. Typically, these are dealt with through standard conditions applied to a permission. **Water and Wastewater** Uisce Éireann's indication that any minor upgrades which may be required can be developer driven are noted and welcomed. **Conclusion** Having regard to the brownfield nature of the site, the proximity of the site to the designated SDZ lands at Clonburris and the associated amenities existing or planned for the scheme, the proposed rezoning meets the requirements for compact and sequential development. It is considered that the rezoning of these lands as set out in proposed amendment No. 15 is in accordance with the proper planning and sustainable development of the area and would offer any future residents a positive environment with potential to overlook the existing open space at Neilstown Park and to avail of the significant community infrastructure in the adjacent Clonburris SDZ.

	It is noted that the OPR has made one recommendation on Variation No. 2 which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation No change to Variation No. 2 (Amendment no. 15) to the South Dublin County Development Plan 2022-2028.	

AMENDMENT NO. 16 - LIFFEY VALLEY MRC

Existing



Proposed

Submission No.

SD-C401-CDP25-62 – Patrick Kenna	SD-C401-CDP25-330 – Sarah McDermott	SD-C401-CDP25-388 – Robert Maloney
SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-414 – niall oneill	SD-C401-CDP25-431 – Lorna Quinn
SD-C401-CDP25-446 – Fiachra Brennan	SD-C401-CDP25-812 – Brady Shipman Martin	SD-C401-CDP25-847 – Grace Lavery O'Reilly
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-1000 – Stacey McGrath	SD-C401-CDP25-1048 – Matt Lavery-O'Reilly
SD-C401-CDP25-1076 – Patrick Healy	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1375 – Office of the Planning Regulator

SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1513 – National Transport Authority
SD-C401-CDP25-1532 – John Gobbett	SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1709 – Daniel McCartney
SD-C401-CDP25-1725 – Department of Education and Youth		

Summary	CE Response
Zoning Numerous submissions understand the principle behind the proposed amendment to the zoning on the subject lands but have raised concerns with the impact additional housing would have on the area. The Major Retail Centre (MRC) zoning should identify specific parcels of land within the area that are suitable for residential development in the short-medium term. This should include existing greenfield sites, along with existing car-centric development within the site (e.g. car dealerships and drive-thru restaurants). Including residential zoning development on the lands is a disaster without a full array of town centre uses. **Overdevelopment** The scale of the proposals raises significant concerns about sustainability, environmental protection, and the ability of existing infrastructure to cope with additional growth.	**Variation and Site Context** The lands are currently zoned as Major Retail Centre (MRC) 'to protect, improve and provide for the future development of a Major Retail Centre'. The proposed Variation will provide for residential development within the current MRC zoning on the lands. Residential use type was permitted within mixed use development on the Liffey Valley lands up to the 2016 County Development Plan at which time it was changed to a not permitted use. The proposal in this Variation would reintroduce residential as permitted in principle within the zoning matrix. The majority of western portions of the site occupies the Liffey Valley Shopping Centre. The southern element of the site includes Tesco supermarket, Liffey Valley Retail Park and a B & Q store. The northern portion of the lands facilities a number of car dealerships and other commercial businesses. There remain vacant lands to the rear of the shopping centre. The total MRC lands measure approximately 67.8 hectares. **Amendments to MRC Zoning**

It was highlighted that 64% of all lands identified in South Dublin for additional development in Proposed Variation No. 2 are in Lucan and Adamstown. Thousands of housing units have already been delivered in this area through the two Strategic Development Zones (SDZ) of Adamstown SDZ and Clonburris SDZ. The resources are not in place to support further development of the Lucan area. The proposed rezoning in the wider area, that is to Finnstown Castle, Liffey Valley Centre lands, St Edmundsbury, Adamstown West, Tubber Lane, Foxhunter site, Adamstown South/West and Grange Castle could result in 10,000 homes. There is a substantial amount of lands zoned for residential development in the wider area, which also includes Strategic Development Zones at Adamstown and Clonburris. It was identified by Uisce Éireann that water network upgrades would be required. In addition to this, sewer network upgrades are likely required and impacts on downstream pumping station would need to be modelled. ESB identifies several network reinforcement initiatives that are currently underway or being evaluated through South Dublin to address substation capacity constraints and main maintain security of supply.	Amendment No. 16 set out in the proposed Variation No. 2 to the South Dublin County Development Plan (2022) seeks to amend the current zoning of MRC to allow for additional permissible uses to that currently set out in Chapter 12 of the Development Plan (2022). Amendment Ref. No. 61 includes alterations to Chapter 9 (Economic Development and Employment) with modifications to the text, policy and objectives in Section 9.5.2 (Pages 362 and 363) as follows: *Liffey Valley Shopping Centre is designated as a Major Retail Centre (MRC). This reflects the Level 2 Retail designation under the regional retail hierarchy set out in the RSES. The established shopping centre use allows for complementary leisure, retail warehouse and commercial land uses. A Major Retail Centre zoning objective applies to this area (see also Chapter 12: Implementation and Monitoring). On-going redevelopment of the shopping centre is taking place with new and expanded retail offer and improved transport mobility measures. The centre will develop as a key public transport hub, works for which will be completed within the life of this County Development Plan. This will provide opportunity for the centre to further expand its offering,* ***to facilitate residential uses as part of a more mixed-use centre*** *and to take advantage of the opportunities provided by the vacant sites within the area.* The current wording associated with Objective 1 of Policy EDE10 (Liffey Valley Major Retail Centre) is adjusted as follows in the proposed amendments: *To support Liffey Valley as a Major Retail Centre (MRC) and allow for the growth of the existing shopping centre and complementary leisure*

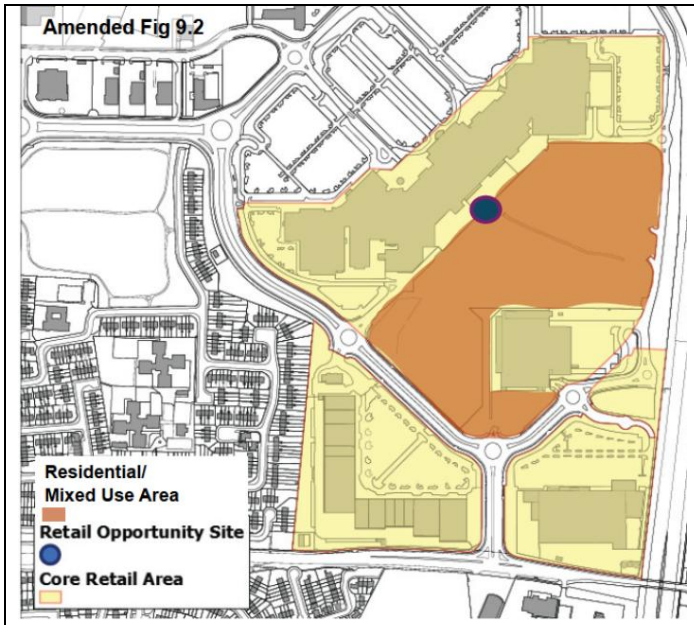
Social Infrastructure Lucan's infrastructure is already overstretched across key services: - School place shortages - Insufficient childcare spaces - Overburdened healthcare facilities - Insufficient community, youth, and sports amenities - Under resourced green and recreational spaces in parts of Lucan There has been no public health nurse for some parts of Lucan for 5+ years. A social infrastructure audit must be completed to ensure adequate services are in place prior to any development. The Department of Education and Youth's submission to the proposed Variation identified school need for the wider Lucan, Adamstown, Palmerstown neighbourhood area but linked this more to growth in Lucan. It should be noted that further engagement with the Department was undertaken following their submission and this is referenced in the CE Response opposite. The Department's submission also indicated that school provision will be subject to the projected population materialising, the age profile of the future population and additional factors that influence	*/ entertainment, retail warehouse, commercial* ***and residential*** *land uses.* Table 12.8 of the current Development Plan (2022) includes modifications in relation to the Permitted in Principle Uses and the Open for Consideration Uses. The Permitted in Principle Uses would include the following additional uses: - Community Centre - Housing for Older People - Live-Work Units - Residential - Traveller Accommodation - Work-Live Units The Open for Consideration Uses would include the following additional uses: - Bed and Breakfast - Conference Centre - Embassy - Guest House - Home Based Economic Activities - Nursing Home - Office-Based Industry - Offices over 1,000sqm - Residential Institution - Retirement Home **Variation Context and Process**

school accommodation needs. The DoEY will continue to engage with the Council regarding the development of both new and existing schools whilst ensuring sufficient land is zoned for this purpose where required. **Traffic And Roads** The submissions state that there is already severe road congestion in the area. Concerns are raised in relation to the lack of permeability from adjacent neighbourhoods with just two main entrances to the site and footbridge that connects with a remote bus stop. Entering or exiting the Liffey Valley complex at the main Fonthill Road Roundabout is hostile for pedestrians or cyclists and difficult for vehicular traffic also. The submissions highlight that the Coldcut Road entrance is not welcoming to anything other than vehicular traffic. Connectivity between these two sites needs to be considered further. Submissions suggest that the zoning change should be accompanied with specific local objectives which seek to significantly reduce car usage in the area as part of any further developments. Specific local objectives should mandate that no new car parking capacity should be provided by any new development within the site. Additional submissions highlighted that any new residential/mixed-use development should ensure that car parking elsewhere is reduced.	For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of ‘additional provision’ of up to 50% to meet the baseline targets, land sufficient to

It was highlighted that vehicular traffic may be tempted to drive down Coldcut Road and Kennelsfort in Palmerstown. The bus stop and scooter freeway ignores traffic lights effectively blocking right turning traffic at the Silver Granite resulting in significant tailbacks. Submissions state that residential development at the subject sites would lead to an overspill of parking on local roads. **Public Transport** The submissions state that Lucan's public transport system is already at capacity and this applies to the local bus stops. Buses routinely pass stops at peak times due to overcrowding. Furthermore, train services are not suitable. The National Transport Authority notes the proposal to rezone a large number of sites throughout the County. It is the view of the NTA that Liffey Valley is well served by public transport and will benefit from investment in the Liffey Valley and Lucan Core Bus Corridor schemes. The site is served by a variety of radial and orbital services. **Parking** A submission suggests that an SLO should be placed on the lands requiring car parking to be provided predominantly in underground or undercroft structures as part of any planning proposal. This	accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. This site has been identified as meeting the required criteria for inclusion in the variation. **Inclusion of Residential and Associated Uses into the Zoning** In order to meet the housing growth targets, the subject lands are considered a suitable opportunity to support high density residential development encouraging the objectives of compact settlements and focusing development in metropolitan areas in a sustainable manner. The lands are situated next to long established settlements to west and south. Given the built-up nature of the subject lands and proximity to current and proposed transport links, the lands provide an ideal opportunity to support housing development. Therefore, this approach

would ensure that land would not be lost to surface car parking and instead could be used for high-quality public open space, landscaping and community amenity areas and support improved urban design outcomes and liveable urban neighbourhoods. **Masterplan Approach** A local authority led Masterplan needs to be developed rather than leaving it to developers. The Masterplan should follow 15-minute city principles, while also recognising Liffey Valley MRC's role as a generator of business from across the county and beyond. The Masterplan should show where residential and mixed uses would be provided. High-density and minimum height targets should be set throughout, and the development of the Lucan Luas should be emphasised in any Masterplan. **Neighbourhood Plans** SDCC should work with neighbourhoods to develop street plans that allow for planned redevelopment to a higher density, benefitting existing homeowners and residents through increased housing supply in centrally located areas. It is suggested to work with tenants, homeowners, landowners and key stakeholders to develop street plans and neighbourhood plans that allow for higher density targets within existing neighbourhoods.	would direct housing delivery away from less accessible locations in the County, limiting the need for rezoning elsewhere in areas in less suitable areas. Any future residents on these lands would have access to good public transport links, active travel routes and to nearby services and amenities, as such meeting long-term compact growth aspirations. The additional uses introduced to the proposed zoning objectives will support the existing community and allow flexibility for residential development within an established settlement and built-up area. **Overdevelopment and Social and Physical Infrastructure** The proposed zoning amendments on the subject lands would facilitate a plan-led approach to provide housing in line with housing requirements set at national level. The concerns raised in relation to pressures put on social infrastructure in the area are noted. However, the Planning Authority is satisfied that there are mechanisms in place to ensure residential development at the subject lands can be supported while integrating existing and projected network of schools, healthcare and community services in the area. The planned and on-going delivery of social infrastructure in consultation with the relevant national and regional bodies would ensure a robust framework to facilitate development on the subject lands and wider area. *Wider Lucan Area* The Council note the projected housing numbers for the wider area. The submissions highlight that 64% of lands identified for additional housing development under Proposed Variation No. 2 are located within the Lucan area followed by thousands of homes from the Adamstown SDZ and Clonburris SDZ. The Compact Settlement Guidelines promotes higher density developments in locations in areas of existing

A submission was made on behalf of Hines Real Estate Ireland in favour of the proposed zoning changes as set out in Table 12.8 of the Written Statement supporting the proposed Variation No.2, to include residential as permitted in principle. Hines' ambition is to deliver an urban mixed-use hub within the SDCC area that is well connected by public transport. It is suggested to update the wording of Policy EDE10 Objective 4 of the Development Plan to include the word "live" as follows: *To promote a high standard of urban design in the Major Retail Centre that contributes to the creation of safe and attractive spaces and creates desirable places within which to work, **live** and visit.* The submission suggests updating Figure 9.2 within Chapter 9 of the Development Plan (2022) to reflect a more mixed-use nature to this centre by identifying a mixed-use area as set out in the image below:	and planned public transport infrastructure. This approach seeks to meet the housing growth targets in a sustainable manner. Therefore, the Council is responding to the requirements set out in the NPF and Section 28 Guidelines by identifying suitable lands to support the increased housing demands. The concerns raised in relation to overdevelopment in the Lucan and Adamstown area are noted. It is acknowledged that the Liffey Valley MRC serves residents of the Lucan area. However, given the location of the lands, to the east of Lucan and more aligned with Palmerstown and North Clondalkin, the existing built form on the lands and the current capacity on vacant / other areas of the lands to accommodate housing and the accessibility of public transport and local facilities, the lands are not considered to unduly impact on the Lucan area. While it is noted that there are lands proposed for rezoning in the Lucan area, each has site related Specific Local Objectives (SLOs) setting out requirements for master planning, infrastructure assessments and phasing requirements to ensure a plan-led approach is achieved ensuring housing delivery is in line with the delivery of the relevant infrastructure. This approach seeks to balance the housing growth requirements in parallel with delivery of infrastructure requirements whilst promoting the principles of compact growth and transit-orientated development. Further response on the perception of overdevelopment is contained with the relevant Amendments in the Lucan area. *Schools* There are a range of schools also located in the area; St Kevin's Community College St Bernadette's Junior and Senior Schools



Overall, Hines Real Estate Ireland welcomes Variation No 2 as prepared by SDCC and suggested some further minor amendments for SDCC's consideration.

Collinstown Community College
Palmerstown Community College
Pobalscoile Iosolde, Palmerstown
King's Hospital School, Palmerstown

Following the submission to the proposed Variation by the Department of Education and Youth, the Planning Authority engaged further with them towards identifying a more detailed analysis of school requirements. Following this, the Department of Education and Youth indicated that should the new populations facilitated by the rezonings materialise at Liffey Valley and Coldcut there will be a need to reserve a primary school site (24-32 classrooms depending on population growth) For secondary schools, it is likely that existing schools in the vicinity will need to expand with the possible requirement of a new secondary school should there be further increases in population above that projected in the current re-zoning.

Having regard to the above it is considered that a Specific Local Objective should be attached to the lands as follows:

CS7 SLO10:
Development on these lands shall have regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development.

Healthcare
Objective 2 linked to Policy COS6 of the Development Plan (2022) seeks to promote healthcare facilities of an appropriate scale to be provided in new communities on a phased basis in tandem with the

	delivery of housing, in accordance with the phasing requirements of Local Area Plans and approved planning schemes and in locations that are accessible by public transport, walking and cycling. There are a number of health facilities within the vicinity of the subject lands for example Hermitage Hospital, Liffey Valley Medical, Village Medical Centre and pharmacies. While health infrastructure is not within the remit of the Council to provide it is supported by the Development Plan (2022) and the Council will continue to support the provision of such facilities. Furthermore, the Planning Authority will continue to facilitate the promotion and introduction of health facilities in the area. *Childcare* Giraffe Childcare is currently located towards the north-western portion of the subject lands. In addition to this, Sweetpea Preschool and Cocoon Childcare are located within the vicinity of the lands. Also located in the area; Ready, Steady Play, Fonthill Road**,** First Steps, Rowlagh**,** Cherry Orchard Community Childcare Services and Quarryvale Creche. Objective 2 linked to Policy COS2 (Social/Community Infrastructure) of the Development Plan (2022) highlights that the council will work closely with the Depart of Education and Youth and the relevant public bodies and state agencies to meet the necessary provision of childcare facilities. Policy COS7 seeks to support the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee. Furthermore, the requirement for creche facilities as part of development is assessed during the planning application process having regard to Childcare Guidelines. *Utilities*

	The ESB acknowledges the aims of the proposed Variation No.2 of the Development Plan (2022) and notes the increased reliance on electricity, combined with climate change impacts are driving the need to enhance the reliability and resilience of the network. It is noted that the ESB Networks are firmly committed in expanding electricity network capacity across Ireland to meet the demands of a growing population and accelerated housing development and the organisation proposes substantial infrastructure investments. ESB identifies several network reinforcement initiatives that are currently underway or being evaluated through South Dublin to address substation capacity constraints and main maintain security of supply. Coordination between SDCC and ESB will continue to ensure secure suitable sites for the development of key electricity infrastructure is considered to support additional housing targets. Uisce Éireann (UÉ) states that water network upgrades would be required on the lands. Furthermore, UÉ emphasised that sewer network upgrades are likely and impacts on downstream pumping station would need to be modelled. Where there are no UÉ projects, upgrades can be developer driven. It is noted that an upgrade of the Ringsend plant was recently completed and it should suffice for the period of the Development Plan 2022-2028. UÉ stated that the Drainage Area Planning is ongoing in the GDA (Greater Dublin Area) across several catchments that will inform upgrade interventions, *Green Infrastructure and Recreational Facilities* Collinstown Park is located to the south of Liffey Valley and includes play areas and dog runs as well as supporting active recreation in terms of pitches. Collinstown Park Sports Complex adjacent to the park and to Collinstown Community College offers various sports facilities and activities including a Cycling Inclusion Centre of Excellence. Cherry

	Orchard Football Club has an astro pitch within easy reach off the R833 (Coldcut Road). In addition, the regional park at Waterstown is accessible by way of the two footbridges over the N4 and the M50. The Liffey Valley is a core green infrastructure corridor adjacent to the lands, of which Waterstown Park is a part. To the extent possible within this built-up area, development will be required to demonstrate green infrastructure features as part of the existing County Development Plan policy. *Environmental Protection* The Variation was accompanied by a Strategic Environmental Assessment that evaluated the likely environmental effects of implementing the Variation, to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making while considering economic and social considerations. **Traffic, Roads and Public Transport** The Revised National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and the South Dublin County Development Plan 2022–2028 sets out ambitions for a long-term approach to transport and land-use integration focusing a shift away from car dependency whilst focusing growth along good public transport routes with access to key active travel infrastructure. Policy SM1 (Overarching – Transport and Movement) of the Development Plan (2022) promotes ease of movement by integrating sustainable land-use planning with a high-quality sustainable transport and movement network. Objective 3 of Policy SM1 (Overarching-Transport and Movement) in the Development Plan (2022) highlights the importance in supporting

	sustainable transport projects like BusConnects. In addition to this, Policy SM3 (Public Transport – Bus) stipulates the importance in delivering the BusConnect corridor routes in consultation with the NTA. The subject lands have access to good public transport links that would be appropriately served by the proposed rezoning set out in the Variation. The National Transport Authority acknowledges that Liffey Valley is well served by public transport. The area will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. The Liffey Valley core bus corridor scheme has commenced, the first of 12 core corridor schemes to do so. The Lucan to City Centre BusConnects scheme is advancing with Notice to Treat issued to landowners in April 2026. The lands Liffey Valley have been prioritised due to existing and planned public transport provision in the area. It is also noted that Liffey Valley, as part of the BusConnects scheme, has now delivered on the bus interchange with associated changes to car parking and traffic movement within the area surrounding the retail centre. The Council continues to actively liaise with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) on the planning and delivery of transport infrastructure across west Dublin, including bus, rail and strategic road networks. This engagement includes ongoing input into the BusConnects programme, which seeks to improve bus capacity, frequency and reliability across the metropolitan area. While submissions highlight dissatisfaction with aspects of BusConnects implementation to date, the Planning Authority notes that the programme represents an evolving network, and SDCC will continue to work with the NTA to secure enhanced bus services.

	A Transport and Traffic Assessment, would be prepared in accordance with the relevant guidance of the National Transport Authority and Transport Infrastructure Ireland, as part of any large scale development, detailing the impact of the proposed development on the wider transport network and setting out measures to mitigate and alleviate such impacts, with particular emphasis on sustainable travel modes. All significant development proposals are subject to a detailed Transport Impact Assessment and Road Safety Audits, where required. These assessments must demonstrate compliance with the GDA Transport Strategy's mode share targets and prioritise walking, cycling, and public transport accessibility. More detailed, cumulative junction and network analysis is required and undertaken at individual planning application stage where required, therefore specific development quantum, trip generation, and mitigation measures can be properly assessed at this point ensuring suitable pedestrian connectivity can be achieved. As such, a Masterplan demonstrating 15-minute city principles is not required for the proposed zoning changes set out in the Variation and these details would be developed further as part of the Traffic Impact Assessment supporting any potential development at the subject lands. The Council continues to invest in active travel infrastructure through projects such as Cycle South Dublin. Car parking standards are set out in section 28 Guidelines, the Sustainable Residential and Compact Settlement Guidelines 2024. As an area with good public transport links, car parking requirements would be reduced as per the guidelines and County Development Plan policy. As such, development within Liffey Valley MRC will be delivered in a way that supports a modal shift, managing traffic impacts and moves away from car-dependent growth to the area.

	The congestion issues raised next to the Silver Granite are considered to be a significant distance from the subject lands and proposed zoning modifications outlined within the proposed Variation No.2 of the Development Plan (2022) relating to these lands would not result in additional impact with regards to this concern. **Parking** For reasons of ensuring liveable neighbourhoods and improved urban design outcomes, a submission has suggested that an SLO should require car parking to be predominantly underground or undercroft. The Revised NPF includes NPO 22 which states: *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.* The standards for car parking are set out in the Residential Development and Compact Settlement Guidelines 2024 and are based on reduced levels of car parking in areas where public transport is frequent and accessible. Liffey Valley is one such area. Typically, high density residential development will include either undercroft or underground car parking as part of development as it would be difficult to achieve high density with large areas of surface car parking. It is considered that there is sufficient policy and objectives at national and local level to address the most appropriate way to facilitate the required car parking at planning application stage and it is not necessary to include an SLO in the Variation. **Masterplan Approach**

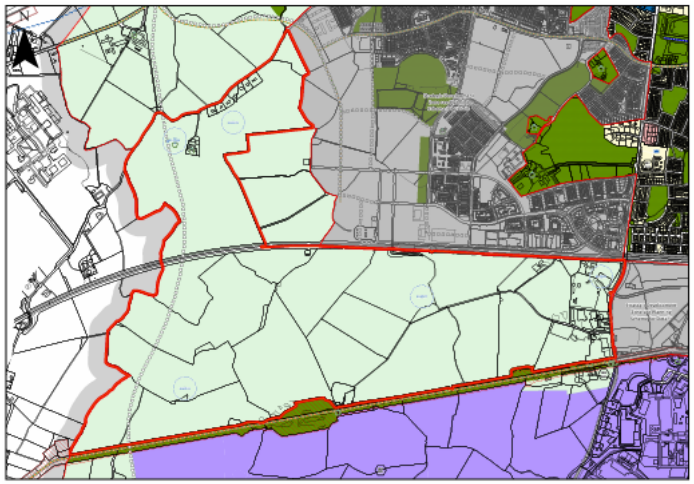
	Objective 2 of Policy QDP1 (Successful and Sustainable Neighbourhoods) of the Development Plan (2022) that residential, mixed use and employment development should provide an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated).Policy QDP2 of the Development Plan (2022) further promotes the use of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest. Additionally, Policy QDP5 promotes short distance neighbourhoods striving towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities. A separate Masterplan for the lands is not considered necessary in this instance in supporting the proposed zoning alterations on the subject lands. The proposed flexibility to the Permitted in Principle uses and Open for Consideration uses is suggested given the high levels of connectivity associated with the subject lands when considering public transport routes and active travel measures. Key routes would be cultivated as part of the design process of any planning discussions with SDCC, while considering the main ambitions to promote sustainable movement patterns. As part of any planning application assessment details in relation to residential numbers and mixed-uses locations would be clarified in line with Development Plan objectives, including but not limited to those outlined above. **Proposed Development Plan Amendments**

	Policy EDE10 of the Development Plan (2022) notes the importance of Liffey Valley Shopping Centre as a designated Major Retail Centre (MRC). This reflects the Level 2 Retail designation under the regional retail hierarchy set out in the RSES. The centre will develop as a key public transport hub, providing opportunity for the centre to further expand its offering and to take advantage of the opportunities provided by the vacant sites within the area. The suggested updated wording to EDE10 Objective 4 is considered appropriate and will reflect the inclusion of residential and associated uses within the zoning. As such, it is recommended to update the wording of Policy EDE10 Objective 4 of the Development Plan to include the word "live" as follows: *To promote a high standard of urban design in the Major Retail Centre that contributes to the creation of safe and attractive spaces and creates desirable places within which to work,* ***live*** *and visit.* The submission from the developer also requests updating Figure 9.2 within Chapter 9 of the Development Plan to identify the lands within the MRC zoning where residential is to be located. This suggested modification is not supported and the proposed changes to the MRC zoning matrix allows for flexibility to incorporate mixed-use development on the lands within the entire area. The suitability of individual sites for the provision of mixed use / residential will be assessed at planning application stage having regard to the zoning objective. **Height and Massing** Objective 6 associated with Policy QDP3 (Neighbourhood Context), ensures that higher buildings in established areas respect the surrounding context and take account of heights and their impact on

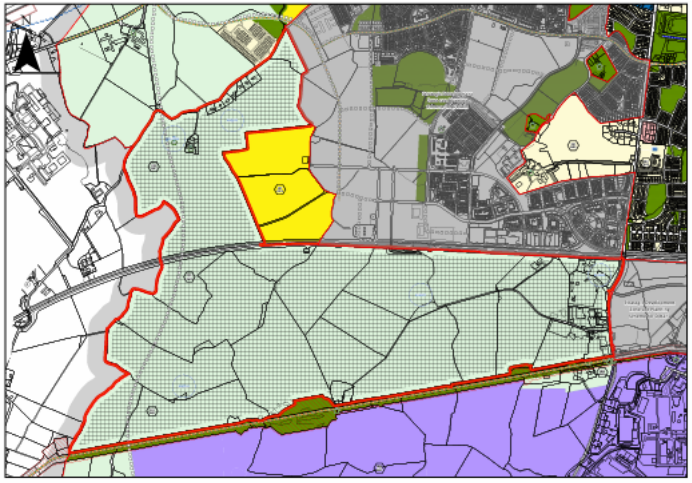
	light and the negative impact that they may have on existing communities to ensure consistency with regards to Healthy Placemaking. Height and massing of any future development at the subject sites would be considered as part of the planning application process, having regard to Development Plan policy including the need to comply with South Dublin's Building Height and Density Guidelines. **Neighbourhood Plans** A key ambition of the Planning Authority in line with national and regional policies is to direct growth within existing urban areas and along public transport corridors, with the aspiration to prevent unsustainable urban sprawl. The Planning Authority will continue to promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in. Policy QDP7 (High Quality Design-Development General) of the Development Plan (2022) seeks to promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture. There are a number of Local Area Plans, Strategic Development Zones and Local Planning Framework documents produced by SDCC that underwent public engagement process. The Council will continue to engage with local residents where these plans are being prepared. It is also noted that all planning applications are subject to public consultation with the ability to appeal SDCC decisions to An Coimisiún Pleanála. **Conclusion** South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and

	climate action and to deliver on the revised housing targets set for the county. The inclusion of residential and associated use types into the MRC zoning matrix as permitted in principle or open for consideration is considered appropriate to support residential development meeting local housing targets directed by national planning policies, whilst also ensuring the maximisation of existing investment in public transport infrastructure and delivering on compact growth. As set out in Section 2 of this CE Report, the OPR has made one recommendation which is that the Planning Authority continue to progress the zoning of additional residential zoned lands, identified as amendments 1 to no. 16 of the proposed Variation. Planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
CE Recommendation To include the following Specific Local Objective (SLO) on the MRC lands: **CS7 SLO10:** ***Development on these lands shall have regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development.*** AND To amend Policy EDE10 Objective 4 of the County Development Plan 2022-2028 as follows: *To promote a high standard of urban design in the Major Retail Centre that contributes to the creation of safe and attractive spaces and creates desirable places within which to work**, live** and visit.*	

AMENDMENT NO. 17 ADAMSTOWN SOUTH AND WEST (OUTER)



Existing



Proposed

Submission No.

SD-C401-CDP25-2 – Igor Shcherba Shcherba

SD-C401-CDP25-17 – Igor Shcherba Shcherba

SD-C401-CDP25-30 – David Lane

SD-C401-CDP25-31 – Iryna Danilova

SD-C401-CDP25-32 – Graham Forde

SD-C401-CDP25-39 – Jorge Collado

SD-C401-CDP25-42 – Kate Taylor

SD-C401-CDP25-44 – Ciaran Henry

SD-C401-CDP25-45 – Nicola Henry

SD-C401-CDP25-46 – Ruth French

SD-C401-CDP25-47 – Sinead Nolan Nolan

SD-C401-CDP25-51 – David McNamara

SD-C401-CDP25-55 – Catherine Coyne

SD-C401-CDP25-56 – Cathal Nolan

SD-C401-CDP25-57 – James Connolly

SD-C401-CDP25-62 – Patrick Kenna

SD-C401-CDP25-69 – Nicky Weir

SD-C401-CDP25-70 – Emmet Rafferty

SD-C401-CDP25-71 – Emmet Rafferty	SD-C401-CDP25-74 – Sophie Henry	SD-C401-CDP25-75 – Kathryn Murray
SD-C401-CDP25-78 – Diane O'Connell	SD-C401-CDP25-83 – Aisling Murphy	SD-C401-CDP25-85 – James Delaney
SD-C401-CDP25-87 – Noelle Whelan	SD-C401-CDP25-92 – Jagadish Mahadevan	SD-C401-CDP25-94 – Julie Monahan
SD-C401-CDP25-95 – Kate Henry	SD-C401-CDP25-96 – Darren Brennan	SD-C401-CDP25-101 – Thomas Woods
SD-C401-CDP25-104 – Kim McCrave	SD-C401-CDP25-106 – Marcia McDonagh	SD-C401-CDP25-109 – Mark Kavanagh
SD-C401-CDP25-112 – Elaine McConnell	SD-C401-CDP25-113 – Mark McConnell	SD-C401-CDP25-116 – Áine Byrne
SD-C401-CDP25-117 – Brid McCormack	SD-C401-CDP25-118 – Aoife Flood	SD-C401-CDP25-119 – Maude Mcmenamin
SD-C401-CDP25-121 – Hanna Varghese	SD-C401-CDP25-122 – julieanne anderson	SD-C401-CDP25-124 – Isabella Fitzsimons
SD-C401-CDP25-126 – Laoibhse Curtis	SD-C401-CDP25-146 – Orla Kelly	SD-C401-CDP25-148 – Cronan Dooley
SD-C401-CDP25-157 – Zelda Cunningham	SD-C401-CDP25-163 – Rory Thynne	SD-C401-CDP25-166 – Elaine O'Hare
SD-C401-CDP25-167 – Sharon Carroll	SD-C401-CDP25-170 – Kevin Donoghue	SD-C401-CDP25-171 – John O'Shea
SD-C401-CDP25-177 – Anand RAJAGOPALAN	SD-C401-CDP25-178 – NIranjana Rajagopalan	SD-C401-CDP25-182 – Terri Moloney

SD-C401-CDP25-183 – Kelley Dunleavy	SD-C401-CDP25-184 – Sean Young	SD-C401-CDP25-185 – Caroline Hogarty
SD-C401-CDP25-186 – Danijela Klopotan	SD-C401-CDP25-190 – Dara-Jane Ruane	SD-C401-CDP25-192 – nial Caffrey
SD-C401-CDP25-193 – Hazel Caffrey	SD-C401-CDP25-197 – Simon Dowling	SD-C401-CDP25-200 – Sofia Alberty
SD-C401-CDP25-206 – Louise Heffernan	SD-C401-CDP25-211 – jorgea rafferty	SD-C401-CDP25-214 – Maureen Young
SD-C401-CDP25-224 – John Brennan	SD-C401-CDP25-227 – Emma Gavin	SD-C401-CDP25-228 – Denise Collins
SD-C401-CDP25-229 – Margaret Dennehy	SD-C401-CDP25-246 – Catherine Kelly	SD-C401-CDP25-273 – Patrick Bradshaw
SD-C401-CDP25-274 – Renata Futo	SD-C401-CDP25-282 – John Kelly	SD-C401-CDP25-285 – Trisha Duffy-Barber
SD-C401-CDP25-293 – Darren Nolan	SD-C401-CDP25-304 – Tom O' FGlynn	SD-C401-CDP25-306 – aoife rafter
SD-C401-CDP25-307 – David Francis	SD-C401-CDP25-308 – Michael Dwyer	SD-C401-CDP25-309 – Mario Ilha
SD-C401-CDP25-310 – Neasa Henry	SD-C401-CDP25-318 – Fearghal Lawlor	SD-C401-CDP25-320 – Karl Meehan
SD-C401-CDP25-330 – Sarah McDermott	SD-C401-CDP25-331 – Hugh McKiernan	SD-C401-CDP25-335 – ian mclaughlin
SD-C401-CDP25-339 – Alyson Brady	SD-C401-CDP25-340 – Dolores Donnelly	SD-C401-CDP25-341 – Catherine Lane

SD-C401-CDP25-342 – Marian Laffan	SD-C401-CDP25-345 – Eileen Sheahan-mclaughlin	SD-C401-CDP25-350 – Liam Byrne
SD-C401-CDP25-351 – Aoife Byrne	SD-C401-CDP25-352 – Derek Byrne	SD-C401-CDP25-353 – Carl Humphreys
SD-C401-CDP25-354 – Carmel Byrne	SD-C401-CDP25-358 – Katie Hynes	SD-C401-CDP25-359 – Shane Nestor
SD-C401-CDP25-364 – Stephen Mason	SD-C401-CDP25-372 – Kayleigh Fox	SD-C401-CDP25-378 – Joseph Fox
SD-C401-CDP25-381 – Valerie O'Neill	SD-C401-CDP25-384 – Miriam Cuesta Moratinos	SD-C401-CDP25-385 – Mary Maloney
SD-C401-CDP25-386 – Justyna Zajakala	SD-C401-CDP25-387 – Philip Kavanagh	SD-C401-CDP25-388 – Robert Maloney
SD-C401-CDP25-391 – Pat Lennon	SD-C401-CDP25-393 – Aisling Lennon	SD-C401-CDP25-395 – Fiona Wolfe
SD-C401-CDP25-397 – Brendan Lennon	SD-C401-CDP25-406 – Joe Whyte	SD-C401-CDP25-407 – Bryan Murphy
SD-C401-CDP25-411 – Brian Kirwan	SD-C401-CDP25-412 – Colette McParland	SD-C401-CDP25-413 – Vivek Soni
SD-C401-CDP25-414 – niall oneill	SD-C401-CDP25-419 – Allison Davis	SD-C401-CDP25-425 – Claire Keogh
SD-C401-CDP25-426 – Aidan Brennan	SD-C401-CDP25-431 – Lorna Quinn	SD-C401-CDP25-434 – Katarzyna Czarzasta
SD-C401-CDP25-436 – Glenn Tubbert	SD-C401-CDP25-441 – Joanne Larkin	SD-C401-CDP25-444 – Timea Tokai

SD-C401-CDP25-450 – Adrienne Doherty	SD-C401-CDP25-459 – Aderrig	SD-C401-CDP25-460 – Evans Kipchaui
SD-C401-CDP25-480 – Joy Hearn	SD-C401-CDP25-482 – Maciej Zajakala	SD-C401-CDP25-491 – Arpit Jain
SD-C401-CDP25-499 – Fiona Dwyer	SD-C401-CDP25-534 – Julie Keane	SD-C401-CDP25-537 – emilian dackiewicz
SD-C401-CDP25-541 – Owen McCabe	SD-C401-CDP25-553 – Saagar Vashisht	SD-C401-CDP25-571 – Murali Krishna Tummala
SD-C401-CDP25-594 – Rupert Fuller	SD-C401-CDP25-598 – Darren Kenny	SD-C401-CDP25-603 – Loe Antonio de Souza Lobo
SD-C401-CDP25-605 – Bhupender Jeet Singh	SD-C401-CDP25-615 – Niamh Power	SD-C401-CDP25-664 – Flood Crowley Partnership
SD-C401-CDP25-671 – Conor Doyle	SD-C401-CDP25-679 – Joanne O'Flynn	SD-C401-CDP25-685 – Ronan Brannigan
SD-C401-CDP25-690 – eric neville	SD-C401-CDP25-695 – Sharon Holland	SD-C401-CDP25-699 – Veronica McCallum
SD-C401-CDP25-712 – Neil Homan	SD-C401-CDP25-722 – Kristin Springer	SD-C401-CDP25-776 – Mary Whittle
SD-C401-CDP25-783 – Sarah Owen	SD-C401-CDP25-825 – Jennifer Merriman	SD-C401-CDP25-838 – Ray Barnes
SD-C401-CDP25-841 – David Kilgannon	SD-C401-CDP25-847 – Grace Lavery O'Reilly	SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-906 – Brendan Hanley	SD-C401-CDP25-912 – glenn roche	SD-C401-CDP25-921 – Oksana Abrosimova
SD-C401-CDP25-1136 – Peter McCallum	SD-C401-CDP25-1159 – David Whittle	SD-C401-CDP25-1160 – Ashleigh D'Arcy
SD-C401-CDP25-1167 – Inland Fisheries Ireland	SD-C401-CDP25-1174 – Aine Maguire	SD-C401-CDP25-1184 – Louise Brogan
SD-C401-CDP25-1187 – Local Resident	SD-C401-CDP25-1193 – Priya Parameswaran	SD-C401-CDP25-1202 – Celine Kiernan
SD-C401-CDP25-1214 – Andrew Dunne	SD-C401-CDP25-1233 – Sarah Casey	SD-C401-CDP25-1239 – Cllr. Helen Farrell
SD-C401-CDP25-1260 – David Kinsella	SD-C401-CDP25-1270 – Marcel Notenboom	SD-C401-CDP25-1271 – Karen Kinsella
SD-C401-CDP25-1305 – Geraldine Lavin	SD-C401-CDP25-1325 – Siobhan Nolan	SD-C401-CDP25-1365 – Hermitage Park
SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1412 – Elaine Collins Collins	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1450 – Edina Almasi
SD-C401-CDP25-1479 – Hugh McGreevy & Sons (c/o Tom Phillips + Associates)	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1525 – Gary Connolly

SD-C401-CDP25-1532 – John Gobbett	SD-C401-CDP25-1542 – Sean Ward	SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail
SD-C401-CDP25-1585 – KPMG Planning for Cairn Homes PLC and the Crowley family	SD-C401-CDP25-1586 – Pallavi Deshmukh	SD-C401-CDP25-1597 – Cllr Vicki Casserly
SD-C401-CDP25-1608 – Manami Greene	SD-C401-CDP25-1643 – Tara Ryan	SD-C401-CDP25-1655 – LIONA O'TOOLE
SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1700 – STANLEY PAUL BLESSING WILLIAM	SD-C401-CDP25-1705 – Kirill Priadko
SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1722 – Patricia Mac Manus	SD-C401-CDP25-1725 – Department of Education and Youth
SD-C401-CDP25-1727 – Ajai Govind Govindan	SD-C401-CDP25-1760 – Laura Doyle	SD-C401-CDP25-2001 – Ben O Byrne
SD-C401-CDP25-2432 – Katie Murnaghan		

Summary	CE Response
The majority of submissions opposed the inclusion of the SDA, whilst a number of landowners / consultants / stakeholders also submitted responses requiring clarification or amendments. These are set out under each relevant topic. **Overdevelopment – Lucan Wide Cumulative Impact**	This amendment is in relation to the designation of lands at Adamstown South and West (Outer) that are currently zoned Objective RU to a 'Future Strategic Long Term Development Area' (SDA) under Variation No. 2 of the South Dublin County Development Plan 2022 2028. This is represented by the hatched lands, rather than the RES N Lands (yellow).

Overdevelopment and disproportionate levels of development have been flagged as issues throughout the consultation submission received by SDCC. Key issues raised include: Disproportionate levels of zonings in certain areas (e.g. Lucan) Certain sites may be omitted from the proposed variation (e.g. Finnstown, Foxhunter, St. Edmunsbury etc.). Further to this, incorrect baseline figures and analysis have been suggested in submissions and used to undertake capacity audit. Additionally, it is also stated that adequate zoned land already exists within the county to meet current demand, contrary to capacity audit. The proposed variation is also suggested to undermine the SDCC own development plan. The topic of 'Overdevelopment' is dealt with in each of the various variation sites throughout this report, however, in a broader sense, the wider context is dealt with in some detail below to allow for wider consideration, notably in the comparative context of Lucan and Waterford, as well as how sites were selected. Submissions also raise consistent and strongly expressed concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by rapid population growth, disproportionate housing delivery, and inadequate supporting infrastructure. Residents emphasise that	The rezoning includes an associated SLO, CS3 SLO1, it states the following: To protect and enhance the Green Infrastructure Corridor along the western boundary with Kildare and protect the Grand Canal Corridor pNHA as part of any future development proposals for these lands to the south and west of Adamstown SDZ. Appropriate ecologically informed buffers for GI corridors and the Grand Canal pNHA will form part of any such proposal. Note also the objectives related to the SDAs in the written statement: CSO3 Objectives 1 to 3, and other relevant SLOs as set out. The SDA is directly south of Adamstown Station and to the south of the Adamstown SDZ, it is to the north of Grange Castle and to the west of Clonburris SDZ. They will surround the proposed variation lands of Adamstown SDZ West. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by

Lucan has undergone significant expansion over several decades, with population growth increasing from a small village of a few thousand in the 1980s, to approximately 15,000 by 1990, 57,000 by 2016, and circa 65,000 by 2026, largely driven by continuous residential development. This growth is frequently compared to that of a city, with Lucan now described as having a population broadly comparable to Waterford City, but without appropriate infrastructure, services or facilities. Concerns are further raised regarding density, noting that Lucan accommodates a similar population within a significantly smaller land area, resulting in a markedly more intense urban form. A key theme is the perception that Lucan and Adamstown have absorbed a disproportionate share of housing development within South Dublin, including the delivery of two Strategic Development Zones (Adamstown and Clonburris), with submissions highlighting that this is unique nationally. It is also noted that 64% of lands identified for additional development under Proposed Variation No. 2 are located within the Lucan–Adamstown area, reinforcing concerns regarding imbalanced spatial distribution of growth. The cumulative pipeline of development is considered substantial, with thousands of units already delivered and significant additional capacity (including SDZ build-out lands and proposed	the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business as usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Planning Authority progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process, Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD).

rezonings) yet to be realised, potentially resulting in a further major increase in population. Submissions consistently assert that this level of growth has outpaced the delivery of critical infrastructure and services, resulting in existing deficits across multiple sectors. Transport infrastructure is identified as a primary constraint, with references to chronic congestion on the N4, Newcastle Road, Adamstown Road, R120 and within Lucan Village, where traffic is described as persistent throughout the day rather than limited to peak periods. Public transport is considered insufficient and unreliable, with overcrowded bus services, lack of rail or Luas connectivity, and the absence of a direct link to Dublin Airport highlighted as key failings. The projected growth associated with further rezonings is considered likely to exacerbate car dependency, congestion and associated environmental impacts. Similarly, significant pressure is identified on social infrastructure, including school capacity, childcare provision and healthcare services. Submissions refer to school place shortages, oversubscribed facilities, and limited GP availability, with many practices reportedly not accepting new patients. Community, recreational and sports facilities are also considered deficient relative to the size of the population, with recent examples cited of facilities reaching capacity shortly after opening.	Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built in additional capacity. South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. **Future Strategic Development Areas** The Chief Executive notes that current housing delivery within the County is significantly reliant on the planned capacity and phased delivery of existing Strategic Development Areas such as Clonburris and Adamstown, which continue to provide the primary locations for large-scale, serviced residential growth. While these areas remain critical to meeting short- to medium-term supply, there is a clear requirement to identify and advance additional Strategic Development Areas to ensure continuity of delivery and to avoid future supply constraints. In this regard, a proactive, plan-led approach is required to bring forward new sustainable growth locations, aligned with infrastructure provision, transport capacity and national planning policy, thereby ensuring that housing delivery can be maintained at the necessary scale beyond the build-out of the existing SDAs. This approach is intended to ensure that critical infrastructure planning, environmental assessment and stakeholder engagement are advanced in parallel with any future consideration of rezoning, thereby reducing delivery risk and avoiding a reliance on retrospective infrastructure provision.

This is compounded by concerns regarding utilities and drainage infrastructure, with suggestions that some systems are already approaching or exceeding operational capacity. A further critical issue is the loss of remaining greenfield and high-amenity lands, particularly at locations such as St. Edmundsbury, Finnstown and other proposed sites. These lands are described as important for biodiversity, landscape character, recreation, and climate resilience, as well as forming part of the wider Liffey Valley green infrastructure network. Their rezoning is viewed as contributing to the progressive erosion of natural and environmental assets in an area already experiencing extensive urbanisation. Overall, the issue of overdevelopment is framed in terms of cumulative impact, with submissions arguing that continued rezoning, in advance of infrastructure delivery, represents a "housing-led" rather than "infrastructure-led" approach. The prevailing concern is that further development will intensify existing deficits, leading to declines in quality of life, increased congestion and environmental pressure, and an erosion of local character and community cohesion, unless balanced by timely and proportionate investment in infrastructure and services.	In accordance with the Guidelines, Variation No. 2 of the CDP is focussed on the current CDP period, while considering the long term need to 2040 and carrying out preparatory work. In terms of the long term housing growth requirement up to 2040, this will largely be addressed in the next CDP, which will be a 10 year plan. Notwithstanding this, given the housing need is known and the detailed plan making process necessary for Strategic Development Areas it is considered prudent at this point to identify suitable future SDAs. The proposed Variation identifies areas as strategic landbanks to enable the commencement of preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of strategic lands as the need arises in the 2030s. The land identified as Future Long Term Strategic Development Areas ('Future SDAs') will provide for housing needs in future development plans. It is important to note that while the lands proposed as Future SDAs under the Variation, they will require a future rezoning decision. The following locations are identified as Future SDAs: • Newlands • Belgard Road • ***Adamstown South and West (outer)*** • Grange Castle / R136 In addition, the proposed Future SDAs align with National Policy Objective 10 of the National Planning Framework (NPF) First Revision 2025 relating to Transport Orientated Development (TOD) which states: • National Policy Objective 10 • Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and

Zoning, Overdevelopment and Phasing *Zoning* A substantial number of submissions address the proposed zoning of lands within Adamstown SDZ West and the Adamstown South & West (Outer) Strategic Development Area (SDA), with strong views expressed regarding both the principle and timing of any residential zoning in this location. Many submissions object to the proposed residential wider levels of zoning, emphasising that many areas have historically functioned as High Amenity lands, strategic green buffers and transitional landscapes between Adamstown SDZ, Lucan Village and the wider Liffey Valley. It is argued that the proposed zoning represents a significant departure from long-established planning objectives which sought to protect these lands from urban development, preserve their landscape setting, and maintain physical separation between settlements. A recurring theme across submissions is the cumulative impact of zoning and development in the Lucan Adamstown area, noting the SDZs, it is contended that the zoning of additional greenfield lands within Adamstown SDZ West and the Outer SDA is premature and unnecessary, particularly in the absence of clear evidence that existing zoned and serviced lands cannot meet housing requirements within the current plan period.	located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth. The SDA designation at Adamstown South and West is planning for future land use change and growth adjacent to Adamstown and the DART+ corridor. This approach provides a number of clear advantages. It ensures that new housing is located close to high-capacity public transport, enabling access to employment, education and services without reliance on the private car, thereby supporting reduced congestion and more efficient use of the existing road network. The Strategic Development Area model, as demonstrated at Adamstown and Clonburris, provides a framework for the coordinated and phased development of lands at scale, allowing for the integrated provision of residential neighbourhoods alongside employment uses, town centres, open space and green infrastructure. This plan-led and phased approach ensures that infrastructure, services and amenities are delivered in tandem with development, creating sustainable, well-served communities while maximising the benefits of significant public investment in rail infrastructure such as DART+. **Overdevelopment – Lucan Wide Cumulative Impact** Submissions raise consistent and strongly held concerns that the Lucan–Adamstown area is experiencing unsustainable levels of development, characterised by cumulative population growth, a concentration of housing delivery, and infrastructure provision not keeping pace with development. The Planning Authority acknowledges that the Lucan–Adamstown area has experienced significant and sustained population growth over several decades, evolving from a small settlement into a major suburban population centre within the Dublin Metropolitan Area.

Alternative approaches are advanced by a number of submitters, particularly in respect of Adamstown West, where it is suggested that the lands would be more appropriately designated for public open space, green infrastructure or a regional park, forming part of a continuous network linked to the Grand Canal corridor and the Liffey Valley, addressing deficits in open space and enabling environmental protection. In contrast, a more limited number of submissions, notably from Flood / Crowley Partnership, TPA on behalf of McCreevey, and Cairn Homes, support Amendment Ref. No. 17, which identifies Adamstown South & West (Outer) as a Future Strategic Long-Term Development Area. This support is grounded in the strategic position of the lands between Adamstown and Clonburris SDZs, their proximity to Adamstown Railway Station, and their potential to consolidate prior public investment in transport and utilities. These submissions acknowledge that the designation appropriately avoids premature residential zoning within the lifetime of the current Development Plan, while providing long-term certainty regarding the strategic growth direction of the area. Supportive submissions further elaborate that, should future residential zoning be pursued beyond the current plan period, it should be sequenced and carefully structured, with first priority afforded to lands with direct frontage onto the Western Dublin Orbital Road. This approach is presented as a means	The area forms part of a key growth corridor within the Dublin Metropolitan Area, where the availability of suitable and serviceable lands, including those proximate to existing and planned transport infrastructure, has been identified at regional and national level as critical to meeting housing demand. A central concern relates to the cumulative impact of development, with submissions asserting that population growth has outpaced the provision of critical infrastructure. Concerns relating to congestion on key transport routes, public transport capacity, and pressure on schools, childcare, healthcare and community facilities are recognised as part of the cumulative impact of growth in the area. Specific issues include traffic congestion on key routes such as the N4, Adamstown Road, Newcastle Road and within Lucan Village, alongside constraints in public transport capacity, including overcrowded bus services and reliance on future rail interventions. Submissions also highlight pressure on social infrastructure, including school places, childcare provision, healthcare services and community facilities, with references to oversubscription and capacity constraints. In addition, concerns are raised regarding the loss of greenfield lands and high-amenity areas, which are viewed as important for environmental quality, recreation and biodiversity. Submissions also raise concerns that a disproportionate quantum of lands identified under the proposed variation are located within the Lucan–Adamstown area. The Planning Authority acknowledges the perception that a disproportionate share of future development is directed to the Lucan area; however, the identification of lands is not based on geographic distribution, but on a rigorous, evidence-based

of facilitating an orderly development pattern, ensuring direct access to strategic infrastructure, and avoiding piecemeal or fragmented growth. Technical documentation accompanying these submissions, including transport assessments prepared by DBFL, is cited in support of this position, indicating how frontage-led zoning could enhance accessibility, circulation and integration with the wider road network when development is eventually brought forward. Strong support is also expressed for the early activation of the Adamstown Station TOD area, which is described as a discrete and deliverable element capable of operating independently within the current plan horizon, while not prejudicing the comprehensive masterplanning of the wider SDA. At the same time, even those supportive submissions express reservations about the lands remaining indefinitely within a passive "long-term" category. They seek clearer signals within the Plan that preparatory studies, masterplanning and engagement with infrastructure providers will progress in the near term, rather than deferring all consideration to a distant future plan cycle. However, they support a carefully sequenced, infrastructure-led and long-term strategic approach to zoning within Adamstown South & West (Outer), emphasising the importance of clarity, masterplanning and alignment with strategic transport infrastructure such as the Western Dublin Orbital Road.	assessment of suitability, infrastructure capacity, accessibility and alignment with national planning policy. In this regard, the availability of suitably located lands within the Dublin Metropolitan Area, including in Lucan–Adamstown, is a key factor in accommodating projected population growth. Submissions frequently draw comparisons with Waterford City to illustrate the scale of population growth; however, the Planning Authority considers that such comparisons require careful contextualisation. Waterford is designated under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) as a Regional City of Scale, with a defined Metropolitan Area Strategic Plan (MASP) and a clear national policy objective to achieve significant population growth supported by targeted investment in infrastructure, regeneration and metropolitan-scale services. By comparison, the Lucan–Adamstown–Palmerstown area forms part of the wider Dublin Metropolitan Area, where growth is planned and distributed across the region in accordance with national housing targets and strategic planning policy, and where the availability of land and proximity to transport corridors are key determinants in shaping development patterns. The revised NPF provides for substantial population growth within the Eastern and Midland Region, reflecting Dublin's role as the primary engine of national population growth, while also supporting higher relative growth in regional cities to achieve balanced regional development. In this context, the Planning Authority considers that the proposed variation responds to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land be identified to meet increased and accelerated housing demand.

Lastly, a submission was received from TPA on behalf of landowner Hugh McCreevey. Whilst the submission broadly supports the variation, and the designation of c.250 hectares at Adamstown South and West as a nationally significant strategic growth area central to meeting NPF housing targets. It argues that, while presented as a single designation, the lands north and south of the rail line function as distinct strategic areas that should each have standalone but coordinated masterplans. Clarification on this point is requested as a non-material alteration to the Variation. *Overdevelopment* Overdevelopment is a dominant and cross-cutting issue raised throughout submissions, consistently framed as a cumulative outcome of successive zoning and development decisions, rather than a concern with any single site in isolation. Submissions specifically reference the proposed Adamstown South & West (Outer) Strategic Development Area (SDA) and state that, when considered alongside the ongoing and incomplete development of Adamstown SDZ, Clonburris SDZ, and other recent and proposed zoning variations in the wider Lucan area, the cumulative scale of development is considered excessive and unsustainable. Many submissions argue that Lucan and wider area has already accommodated a disproportionate share	Submissions question the necessity of proposed rezonings, with reference to the housing capacity identified in the South Dublin County Development Plan 2022–2028. While it is acknowledged that the Development Plan identified a substantial quantum of zoned land, subsequent to its adoption there have been significant changes in national planning policy, including the revised NPF and associated Section 28 Ministerial Guidelines. These guidelines require planning authorities to review their Core Strategy and zoning provisions to ensure alignment with updated housing targets and delivery requirements. In response, the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. This process included engagement with key internal departments and relevant infrastructure providers to ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development. The sites identified under the proposed variation were selected on the basis of this evidence-based assessment, having regard to their proximity to existing and planned infrastructure, their capacity to support appropriate densities, and their alignment with compact growth and transport-oriented development principles. Importantly, future development is not unstructured but will be coordinated through the application of site-specific Specific Local Objectives (SLOs) and the Development Plan framework. Zoning represents a strategic first step and does not, in itself, facilitate immediate development. The purpose of the Specific Local Objective is to provide clear site-specific policy guidance in respect of key infrastructure linkages and environmental considerations.

of county-wide housing growth, with Adamstown and Clonburris SDZs together representing significant concentrations of development that continue to exert pressure on transport infrastructure, schools, community and social facilities, healthcare provision, utilities and environmental assets. In this context, the inclusion of the SDA is widely viewed as a further intensification that would exacerbate existing constraints, rather than address them. Submissions repeatedly describe Lucan as having reached, or already exceeded, its practical carrying capacity, with references to sustained traffic congestion, worsening journey times, overcrowded schools, limited community facilities, pressure on health services, and diminishing access to green space. The issue of overdevelopment is closely linked to the knock-on impacts identified across other issue areas in submissions. It is argued that the cumulative addition of residential development associated with the SDA, when combined with Adamstown SDZ, Clonburris SDZ and other zonings, would generate significant additional travel demand onto an already constrained transport network, intensify congestion across Lucan and surrounding routes, and further undermine road safety. Similarly, submissions contend that schools and community facilities have not kept pace with existing population growth and that further development at SDA scale would stretch these services beyond capacity. Environmental and amenity impacts are also linked to overdevelopment,	The SLO will be applied through appropriate phasing conditions, planning assessment and compliance mechanisms at planning application stage. In this way, SLOs provide a structured mechanism to ensure that development is aligned with available or planned infrastructure and proceeds in a coordinated manner. Furthermore, the SLOs ensure that development proposals are subject to detailed assessment and coordination, thereby avoiding piecemeal or uncoordinated development and ensuring that infrastructure requirements, including transport demand, are clearly identified and addressed at the appropriate stage. The Council has also delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. These investments demonstrate the Council's ongoing commitment to aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit. The Planning Authority also notes that the development of Adamstown and Clonburris through the Strategic Development Zone (SDZ) framework represents best practice in the coordinated delivery of large-scale residential communities. These areas have been planned and phased to provide for the delivery of community facilities, transport infrastructure and open space in tandem with population

with submissions stating that continued expansion reduces the availability of open space, erodes green buffers and diminishes overall quality of life. A recurring narrative within these submissions is that Lucan has taken “more than its fair share” of development, with some submitters pointing to figures suggesting that a high proportion of proposed rezonings in the county are concentrated locally. This is framed as inequitable and contrary to balanced regional development, particularly where other areas have greater capacity or opportunity to absorb growth with fewer cumulative impacts. At the same time, a smaller number of submissions, primarily from landowners and prospective developers, address overdevelopment from a different perspective. These submissions argue that the Adamstown South & West (Outer) SDA represents sequential consolidation rather than leap-frogging, contending that development of the SDA would complete a strategic “missing piece” between Adamstown SDZ, the canal corridor and the Grange Castle employment lands. From this viewpoint, the SDA is seen not as an expansion into remote greenfield locations but as a logical continuation of an established growth centre, capable of being planned comprehensively and delivered in phases. It is suggested that, if approached through masterplanning and infrastructure-led sequencing, development within the SDA could avoid fragmented or ad-hoc growth	growth. This approach reflects a coordinated, urban design-led model of development, promoting the efficient use of land and supporting transport-oriented development. The experience of the SDZs has informed the Council’s approach to future growth, and the Planning Authority will continue to apply and reflect on the lessons learned to ensure that development is delivered in a coordinated and sustainable manner. The delivery of infrastructure such as DART+ South West, BusConnects and active travel networks provides the basis for improved sustainable mobility within the wider area. It is recognised that public transport service provision and service levels are a matter for the National Transport Authority (NTA) and relevant operators. The Planning Authority will continue to engage with the NTA and other stakeholders to ensure that future transport demand arising from population growth, including that facilitated by these rezonings, is planned for and responded to in a coordinated manner, aligned with national and regional transport strategies. The zoning approach for lands in Lucan is consistent with national and local planning policy which promotes compact, sustainable growth. In particular, the lands are generally located in proximity to existing and planned schools, neighbourhood centres, public transport fixed infrastructure and existing routes and parks. This pattern of development reduces the need to travel by car, supports shorter trips and enables greater use of walking, cycling and public transport. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated district and neighbourhood transport assessments. This will inform detailed engagement with both elected members and national

and support the consolidation of Adamstown as a coherent urban area. Notwithstanding this supportive position, the prevailing view across submissions is that cumulative overdevelopment remains a critical concern, and that the proposed SDA, when assessed alongside the scale and pace of existing SDZ development and other zoning proposals, would intensify already evident pressures on infrastructure, services and the environment. Submissions therefore consistently call for greater restraint, consolidation of existing zoned lands, and meaningful resolution of current deficits before any further large-scale development associated with the SDA is progressed. *Phasing* Phasing is one of the most consistently raised and strongly expressed issues across submissions relating to Adamstown SDZ West and the Adamstown South & West (Outer) Strategic Development Area (SDA). Submissions broadly contend that the current approach to phasing is inadequate and insufficiently robust, particularly given the cumulative scale of development already underway or permitted within Adamstown SDZ, Clonburris SDZ, and other non-SDA variation sites in the wider Lucan Adamstown area. Many submissions argue that the scale and pace of development across multiple large sites have resulted in residential occupation significantly outpacing the delivery of essential infrastructure and services.	transport agencies on future transport options and potential projects. This study will develop a transport strategy. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. While the cumulative nature of development in the Lucan–Adamstown area is acknowledged, it is managed through ongoing coordination of land use, infrastructure planning and delivery. In considering cumulative impacts, it is recognised that capacity is not a static measure but evolves over time, having regard to the status of permitted and constructed development, the progression of capital infrastructure programmes, and the delivery of schools, health care, and transport services by relevant agencies. As such, detailed cumulative assessment is most appropriately carried out at defined points in time where the status of these variables is known, including at planning application stage and through ongoing infrastructure planning processes. This approach does not defer consideration of cumulative impact but reflects the dynamic nature of infrastructure delivery and ensures that assessment is based on up-to-date and verifiable information. The identification of zoned residential lands forms an important input into wider infrastructure planning, as it establishes the projected population and development quantum required to inform investment decisions by the Council and external service providers. The Planning Authority will continue to engage with relevant agencies to align future development with the timely delivery of supporting infrastructure.

A dominant concern is the linkage of future development to the commencement, rather than the operational delivery, of critical infrastructure. In particular, submissions strongly object to development proceeding on the basis that DART+ South West has merely commenced construction, arguing that this does not provide usable public transport capacity and could result in a prolonged period where additional development is served by already constrained transport networks. Similar concerns are raised in respect of schools, roads, utilities, parks and community facilities, with submissions repeatedly stating that these services should be fully delivered, operational, and accessible before any further rezoning or large-scale development is permitted within the SDA. Submissions frequently emphasise that existing phased new towns, notably Adamstown SDZ and Clonburris SDZ, should be substantially completed before further strategic lands are brought forward. It is argued that these SDZs were expressly intended to deliver comprehensive, infrastructure-led growth, yet remain incomplete, with outstanding deficits in transport capacity, community and social facilities, schools, and recreational amenities. In this context, the inclusion and future activation of the SDA is viewed by many as premature, with requests that rezoning be deferred until the existing SDZs have delivered their full complement of infrastructure and	Overall, the concerns raised regarding overdevelopment, infrastructure capacity and quality of life are acknowledged. However, the Planning Authority is satisfied that the proposed variation is grounded in national policy, statutory requirements and a coordinated development framework. The approach seeks to balance the need to accommodate ongoing population growth within the Dublin Metropolitan Area—supported by the availability of suitable lands—with the delivery of infrastructure, sustainable transport integration and the principles of compact, transit-oriented development, while contributing to broader national objectives of balanced regional growth. **Zoning, Overdevelopment and Phasing** The submissions received in relation to zoning within Adamstown SDZ West and the Adamstown South & West (Outer) Strategic Development Area (SDA) have been carefully considered, having regard to the cumulative development context in the wider Lucan Adamstown area, the statutory planning framework, and national and regional policy objectives. It is acknowledged that a substantial number of submissions object to the principle and timing of additional residential zoning in Lucan and in a wider sense at St. Edmundsbury, Adamstown SDZ West and Finnstown. These submissions emphasise the longstanding designation of these lands as transitional landscapes, performing important roles as green buffers between Adamstown SDZ, Lucan Village and the wider Liffey Valley, and express concern that rezoning would represent a departure from historic planning objectives to maintain separation between settlements and protect landscape and environmental assets. Strong emphasis is also placed on the cumulative impact of development from the SDZs both of which remain incomplete and

services. The absence of clear, enforceable phasing triggers tied to delivery outcomes rather than project initiation is cited as a fundamental weakness of the current proposals. At the same time, submissions from landowners and consultants, including those representing interests within the SDA, advance a more structured and supportive phasing narrative. These submissions propose a masterplan-led phasing strategy, whereby an agreed framework for the entire SDA is established in advance of planning applications, ensuring that later phases are safeguarded and coherently integrated. Central to this approach is the identification of Phase 1 within the Adamstown Station Transit Oriented Development (TOD) area, which is presented as a logical and contained first phase capable of acting as a catalyst and gateway for the wider SDA. This TOD-focused phase is argued to be uniquely suitable for early delivery due to its proximity to Adamstown Railway Station, existing rail services, BusConnects corridors, and planned DART+ upgrades, allowing it to function independently without prejudicing the comprehensive development of the remaining lands. Supportive submissions emphasise that phasing should be explicitly linked to infrastructure sequencing, social infrastructure provision, and mobility delivery, with clear milestones governing the progression from one phase to the next. From this	continue to generate pressure on transport networks, services and environmental capacity. At the same time, it is necessary to distinguish between immediate residential zoning and the identification of lands for long-term strategic growth. Amendment Ref. No. 17 does not propose the rezoning of the Adamstown South & West (Outer) lands for residential development. The designation of the SDA reflects the strategic location of the lands within the Dublin Metropolitan Area, and their proximity to Adamstown Railway Station, existing and planned public transport investment, and strategic road infrastructure. The approach is consistent with national policy supporting Transit Oriented Development (TOD) and compact, sequential growth at locations capable of integrating future population with high-capacity public transport and existing infrastructure, rather than facilitating dispersed or ad-hoc development elsewhere. Supportive submissions from Flood / Crowley Partnership, Cairn Homes and other landowners, as well as the submission from TPA on behalf of Hugh McCreevey, are noted in this regard. They also acknowledge that the SDA designation appropriately avoids premature residential zoning, while providing clarity on the long-term spatial strategy for the area. The Planning Authority notes the suggestion advanced by TPA that the lands north and south of the railway line could function as distinct but coordinated strategic areas requiring separate masterplans. While this observation is acknowledged, it is considered that, at this stage, the lands are appropriately designated as a single Strategic Development Area. This ensures a coherent, integrated and plan-led approach to future development, avoids piecemeal consideration, and safeguards the ability to coordinate infrastructure, transport, green infrastructure

perspective, the SDA is framed as an opportunity to correct earlier shortcomings by embedding enforceable, infrastructure-first phasing mechanisms, provided that lessons from the delivery of Adamstown SDZ and other large-scale developments are fully applied. Overall, submissions on phasing underscore the importance of addressing development in a cumulative and strategic manner, recognising the compounded impacts of multiple SDZs and variation sites within the Lucan Adamstown area. While many submissions oppose further advancement of the SDA until existing developments are completed and operational deficits resolved, others support progression only on the basis of a tightly controlled, TOD-led and masterplanned phasing strategy that ensures infrastructure, services and sustainable transport are delivered in advance of, or at least in step with, residential development. **Transport** *Public Transport, Active Travel and Public Safety* Submissions raise extensive concerns regarding the adequacy, reliability and capacity of public transport serving the wider Lucan area, but with respective to the proposed SDA, expressing concern at the cumulative impact and further issues around service delivery and reliability. Recurrent reference is made to existing levels of overcrowding on bus services operating along the Lucan corridor, particularly	and environmental protection measures across the full extent of the lands. The detailed structuring of the SDA, including any subdivision into phases or character areas, will be a matter for a future masterplan and/or statutory planning framework, informed by environmental assessment, infrastructure capacity and engagement with prescribed bodies. It is emphasised that any future progression of development within the SDA will be masterplan-led, phased and infrastructure-first, with sequencing explicitly linked to the delivery of services and strategic infrastructure, including public transport, road capacity, schools, community facilities, utilities, open space and green infrastructure. Further engagement with infrastructure providers, statutory agencies and the public will form an integral part of this process. In summary, while the concerns raised regarding cumulative impacts, environmental sensitivity and the capacity of Lucan/ Adamstown to absorb further development are acknowledged, it is considered that the proposed long-term SDA designation represents an appropriate and policy-aligned response to housing supply. The amendment does not facilitate immediate residential zoning, but instead provides strategic clarity, avoids ad-hoc expansion, and aligns future growth with TOD principles and national policy objectives, while ensuring that detailed consideration of scale, form, phasing and infrastructure delivery is deferred to a more appropriate stage through a comprehensive masterplanning process. *Overdevelopment* The Planning Authority acknowledges concerns regarding cumulative development pressures in the Lucan–Adamstown area, including impacts on infrastructure, services and environmental assets. However,

during peak commuting hours, with frequent reports of buses arriving full or failing to stop. Submissions also stated that public transport in Lucan is already under significant strain. DART+ South West remains without a confirmed construction timeline and has been subject to repeated delays, while existing bus services are frequently overcrowded. The BusConnects redesign has reduced service coverage in areas such as Dodsborough and Hillcrest, and despite Lucan's size, there is still no direct public transport link to Dublin Airport. Advancing rezoning for large scale development before these critical transport upgrades are delivered will further overstretch an already constrained system. Submissions further highlight the withdrawal and reconfiguration of established routes under BusConnects, most notably the removal of the former Route 25 from Adamstown, which is described as having reduced direct connectivity to the city centre and key destinations. Rail services at Adamstown Station are also cited as operating at or near capacity, with overcrowding on the Kildare line and limited peak hour service frequency identified as ongoing constraints. A dominant theme across submissions is concern regarding the linkage of further residential development to the commencement, rather than the delivery of, the DART+ South West project. It is argued that this approach does not equate to the availability of usable transport capacity and could result in a	it is emphasised that existing growth, including Adamstown and Clonburris SDZs, is being delivered through statutory, plan-led frameworks which provide for the phased and coordinated provision of infrastructure, community facilities and open space in tandem with development. The identification of Adamstown South and West (Outer) as a Strategic Development Area (SDA) does not constitute immediate zoning or enable development in the short term, but instead establishes a long-term, strategic framework for growth. The SDA will be subject to comprehensive masterplanning, environmental assessment and infrastructure-led phasing, ensuring that development occurs sequentially and in a coordinated manner. Its location adjacent to the existing built-up area and Adamstown Station supports a Transit Oriented Development (TOD) approach, aligned with the National Planning Framework (NPF) objectives for compact growth, sustainable mobility and climate action. Accordingly, the SDA is considered a policy-led response to long-term metropolitan growth, ensuring that development is planned, integrated and delivered in a sustainable manner, rather than contributing to uncoordinated or premature overdevelopment. *Zoning* The Planning Authority acknowledges concerns regarding the timing and scale of zoning; however, it is emphasised that the SDA designation does not equate to immediate development or zoning. Instead, it provides a structured, plan-led mechanism to guide future growth beyond the lifetime of the current Development Plan, ensuring that land use, infrastructure and environmental considerations are addressed in advance of development.

prolonged interim period during which congestion and car dependency would intensify while construction is ongoing. Submissions emphasise that, notwithstanding the presence of a rail station, Adamstown remains characterised by high levels of car use, and that additional population growth in advance of enhanced public transport provision would undermine sustainable mobility objectives. The absence of a direct public transport link between Lucan and Dublin Airport and the wider South Dublin area is repeatedly cited as evidence of a strategic gap in the transport hierarchy serving a major growth area. In addition to the above, a submission was received from the National Transport Authority (NTA), the NTA notes the identification of future strategic long-term development areas at Adamstown South and West (Outer), Belgard, Newlands, Grange Castle, and the objectives which apply to their progress. The NTA is satisfied that in the long-term, development at these locations could potentially align with the principles of transport and land-use integration as long as their development is subject to a statutory land use plan which provides for the phasing of growth in line with the provision of transport infrastructure and services. In the case of Newlands in particular, this should include an assessment of the interface between any	The designation approach is therefore consistent with NPF policy objectives for compact growth and TOD, ensuring that development is directed to accessible, serviced locations contiguous to existing urban areas, while avoiding unmanaged or ad hoc expansion. Overall, the Planning Authority is satisfied that the proposed framework provides robust safeguards to ensure that any future zoning and development is phased, infrastructure-led, environmentally sensitive and compliant with national and local planning policy. Note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Any future progression of lands within the SDA will be contingent on the preparation of a comprehensive masterplan, supported by Strategic Environmental Assessment, Appropriate Assessment, flood risk assessment and detailed Transport and Traffic Strategies, as well as alignment with County Development Plan objectives and Section 28 Guidelines. Development will be required to demonstrate infrastructure capacity, environmental protection (including green infrastructure and ecological buffers), and integration with existing urban structure. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3, and do not preclude the identification of the subject lands as a Future SDA. **Transport** *Public Transport, Active Travel and Public Safety*

emerging developments and the Red Cow Luas services and depot facilities, and the potential impacts on the N7 National Road. It is the view of the NTA that the most appropriate mechanism to achieve the above is through undertaking Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII), as part of the preparation of statutory land use plans. The need for an ABTA for these sites should be included within the objectives under Policy CS3. Iarnród Éireann highlights strong population and housing growth pressures and notes that key housing developments are dependent on the DART+ South West project, requiring transport assessments before proceeding. It also emphasises that developments near the railway, including Adamstown lands, must protect the railway boundary and allow for future infrastructure upgrades. In contrast, submissions from landowners and prospective developers, including Flood Crowley Partnership and Cairn Homes, highlight the public transport strengths of the lands, placing strong emphasis on a Transit Oriented Development (TOD) approach. These submissions describe Adamstown Station as a genuine transport anchor offering existing commuter rail services, integration with BusConnects corridors, cycle parking and taxi	The designation of Adamstown South and West (Outer) Strategic Development Area as a Future Strategic Long-Term Development Area reflects a plan-led, long-term approach. In relation to transport and movement, the area has significant potential to be developed in accordance with Transit Oriented Development (TOD) principles, centred on Adamstown Station and supported by the future delivery of DART+ South West, alongside BusConnects improvements. This ensures that any future development is aligned with high-capacity public transport, subject to appropriate phasing and infrastructure delivery. Any future phasing framework in a plan for this SDA will be required to align development progression with the delivery and operation of transport infrastructure and network capacity. Active travel will be a core component of any future planning framework for the SDA, integrating with and expand the existing Adamstown SDZ walking and cycling network, including connections to the Grand Canal Greenway and Grangecastle employment area, supported by Cycle South Dublin and national active travel policies. Design standards such as DMURS and the National Cycle Manual will ensure safe, legible and high-quality environments, prioritising pedestrians and cyclists. While submissions highlight current deficiencies and safety concerns, the SDA provides an opportunity to address these through a masterplan-led, infrastructure-first approach, ensuring coordinated delivery of future transport infrastructure, services and active travel infrastructure. The Planning Authority is advancing a comprehensive transportation study for the west of the county, along with associated district and

facilities, and note that DART+ South West is projected to substantially increase rail passenger capacity over time. They also highlight the availability of direct pedestrian and cycling connections to the Grand Canal Greenway and the Grange Castle employment area as key sustainable mobility assets capable of supporting compact growth. The submission from TPA on behalf of McCreevey objects to the condition preventing occupation of homes until DART+ South West construction commences, citing a lack of evidence or transport assessment. It argues the condition conflicts with national housing policy and would effectively sterilise over 2,500 essential homes needed to meet statutory targets to 2028 and 2034. This exposes SDCC to potential intervention for failing to zone deliverable land in line with the NPF and 2025 Housing Guidelines. Submissions also argue that car dependent development in advance of public transport delivery conflicts with climate action objectives and would increase emissions, congestion and environmental impact, contrary to national policy. *Active Travel and Public Safety* Active travel considerations are raised across submissions in relation to the Adamstown South & West (Outer) Strategic Development Area (SDA), with submissions expressing contrasting perspectives based on existing conditions and future	neighbourhood transport assessments. This will inform detailed engagement with both elected members and national transport agencies on future transport options and potential projects. This study will develop a transport strategy and inform future analysis and land uses for this designated SDA. This work will specifically assess cumulative development impacts across the Lucan–Adamstown area, including Adamstown and Clonburris SDZs and other zoned lands, to ensure that future growth is based on a clear understanding of network capacity and movement and supported by appropriate mitigation and infrastructure delivery measures. Overall, the Planning Authority is satisfied that a future framework will deliver a safe, connected and sustainable transport network, supporting modal shift, public safety and long-term environmental and mobility objectives, and notes the commentary from Irish Rail and the NTA. With regard to the NTA, the Council welcomes the NTAs view that the Future Strategic Long-Term Development Areas could potentially align with the principles of transport and land-use integration subject to a statutory land use plan providing for growth in line with the provision of transport infrastructure and services. The intention of the Future SDA designation is to allow for the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders including the NTA and TII to plan for the release of lands as need arises in the 2030s, to inform future rezoning proposals. The observations on Adamstown SDA and the interface with the existing transport infrastructure is noted and will be a key consideration as part of the plan-led approach to these lands set out in Policy CS3.

development potential. The issue is framed both in terms of current deficiencies within the wider Lucan Adamstown area and the opportunity for improvement through comprehensive, masterplanned development of the SDA. A number of submissions raise concerns regarding the current quality and safety of walking and cycling conditions, particularly within and adjoining Adamstown SDZ. These submissions state that footpaths and cycle lanes are increasingly obstructed by on-street parking, especially in newer residential areas with limited parking provision, undermining pedestrian accessibility and cyclist safety. Traffic congestion and widespread rat-running through residential streets are also cited as factors that discourage walking and cycling, with submissions arguing that high traffic volumes, speeding vehicles and fragmented cycling infrastructure create unsafe conditions. In this context, it is contended that further development within the SDA, if not accompanied by safe, segregated and continuous walking and cycling infrastructure, would exacerbate existing problems and further discourage active travel as a viable mode of transport, particularly for children, older residents and less confident cyclists. These concerns are closely linked to cumulative development pressures arising from Adamstown SDZ, Clonburris SDZ and other zoned lands, with submissions arguing that active travel infrastructure	An objective within that policy clearly sets out the intent for a statutory process and the need for sustainable transport options as follows: *CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* The benefit that an Area-Based Transport Assessments (ABTA) could bring to the process is noted and considered appropriate to include by way of a further objective under Policy CS3. The Planning Authority notes that the Transit Oriented Development (TOD) approach for Adamstown South and West (Outer) aligns with national objectives for compact growth, climate action and sustainable mobility, focusing development around Adamstown Station and the future delivery of DART+ South West. The Strategic Development Area (SDA), together with other variation lands, will be required to integrate with existing and planned infrastructure and will be subject to detailed masterplanning, Transport and Traffic Assessments, and phased infrastructure delivery. This approach ensures that future development is delivered in a coordinated, sustainable and infrastructure-led manner, avoiding adverse impacts on the wider transport network while supporting long-term growth.

has not always been delivered in step with residential growth. By contrast, submissions from Cairn Homes and other landowners and consultants express strong support for the integration of the SDA into regional and local active travel networks as a core structuring principle. These submissions highlight the strategic opportunity presented by the SDA to deliver a coherent and connected active travel framework rather than incremental, fragmented provision. Particular emphasis is placed on direct connections to the Grand Canal Greenway, enabling east west cycling and walking links of regional significance, as well as enhanced north south pedestrian and cycle permeability connecting Adamstown with the Grange Castle employment area. These corridors are presented as key routes capable of supporting daily commuting, leisure activity and access to services. Supportive submissions also outline proposals for internal green loops and high-quality public realm within the SDA, designed to ensure safe, attractive and walkable access to public transport, schools, community facilities and local amenities from all development phases. From this perspective, the SDA is viewed as an opportunity to embed active travel at the outset, ensuring that walking and cycling are convenient, safe and intuitive choices, particularly in proximity to the Adamstown Station Transit Oriented Development (TOD) area.	*Traffic and Roads* The Planning Authority acknowledges that the Lucan–Adamstown road network is experiencing significant congestion and capacity pressures, including at Lucan Village, the N4 corridor, Newcastle Road (R120), Adamstown Road and surrounding routes, arising from cumulative development in the area. Concerns relating to rat-running, road safety, congestion beyond peak hours and impacts on local movement and emergency access are noted. However, the designation of the Strategic Development Area (SDA) does not permit immediate development; rather, it establishes a pathway to a plan-led framework to integrate with surrounding SDZs, align with the GDA Transport Strategy and County Development Plan objectives, and not compromise future strategic infrastructure, including ongoing studies such as the western transport study. Overall, while existing traffic issues are acknowledged, the Planning Authority considers that the SDA framework ensures that any future development will be infrastructure-led, rigorously assessed and strategically integrated, and will not proceed where adequate capacity and mitigation measures are not demonstrated. *Parking* The Planning Authority acknowledges existing parking pressures within parts of the Adamstown–Lucan area; however, it is emphasised that the Strategic Development Area (SDA) comprises future lands and will be subject to a comprehensive, masterplan-led approach. Any future development will be required to comply with the South Dublin County Development Plan parking standards, alongside national policy objectives under the National Planning Framework (NPF) promoting compact growth and reduced car dependency/modal shift.

Overall, submissions on active travel reflect a clear tension between existing shortcomings and future potential. While many submissions highlight current safety issues, congestion and poor enforcement as barriers to active travel. The effectiveness of active travel provision within the SDA is therefore closely linked to the manner in which development is planned and phased, and to whether lessons from the delivery of existing SDZs are successfully applied. **Traffic and Roads** Traffic and road capacity issues are the most consistently raised concerns across the combined submissions. Submissions describe severe and persistent congestion affecting a wide network of local and strategic routes in the wider Lucan Adamstown area, including Lucan Village, the N4 /M4corridor and associated junctions, Newcastle Road (R120), Adamstown Road, Dodsborough Road, the R136, the SuperValu junction and the internal distributor roads serving Adamstown SDZ. Many submissions state that congestion is no longer confined to traditional peak periods and is now experienced throughout the day, with adverse impacts on daily journeys, emergency service response times, and overall accessibility. There is a strong emphasis on the cumulative nature of these impacts, with submissions highlighting that	Parking provision will be determined through detailed Traffic and Transport Assessments and Mobility Management Plans, or other mechanisms as required, ensuring it is responsive to location, accessibility, and proximity to high-capacity public transport and active travel infrastructure in line with Transit Oriented Development (TOD) principles. This approach ensures that parking is managed in an integrated, sustainable and policy-compliant manner, avoiding the replication of car-dependent development and supporting a shift towards more sustainable travel behaviours. Therefore, it is important to note, Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Any future assessment will consider the capacity of the existing road network, identify required mitigation measures, and assess impacts on adjoining land uses. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 Objective 3, and do not preclude the identification of the subject lands as a Future SDA. **Biodiversity and Green Infrastructure** The issues raised in relation to biodiversity and green infrastructure have been carefully considered, having regard to the submissions received, the strategic planning context for the area, and the specific policy mechanisms proposed to address these matters.

congestion has intensified steadily as a result of ongoing development associated with Adamstown SDZ, Clonburris SDZ and wider residential growth in the Lucan area. Increased rat running through established residential estates, including Castlegate and Ballyowen, is repeatedly cited as drivers seek to avoid congested arterial routes. This is described as generating additional road safety risks, particularly for pedestrians and cyclists, and undermining residential amenity within these neighbourhoods. Submissions frequently raise concerns regarding road safety. The combined impacts of construction traffic associated with ongoing SDZ build out are also highlighted, with submissions citing dust, noise, vibration and safety concerns arising from heavy goods vehicles travelling through established residential areas. A recurring and significant concern is that the inclusion of the Strategic Development Area (SDA) at Adamstown South and West would substantially exacerbate existing traffic and transport problems. Submissions argue that development of the SDA, when considered in combination with existing and permitted development in Adamstown and Clonburris, would generate thousands of additional daily vehicle movements onto an already overloaded road network. It is maintained that this would result in longer journey times, increased congestion and further deterioration in road safety, in the absence of	It is acknowledged that the lands within Adamstown SDZ West and the Adamstown South & West (Outer) Strategic Development Area (SDA), including St. Edmundsbury, Aderrig West and Finnstown, form part of a wider, interconnected green and ecological network extending along the River Liffey, the Grand Canal corridor and adjoining amenity and transitional lands. The importance of hedgerows, historic field boundaries, woodland patches, canal-side environments and semi-natural grasslands in supporting ecological connectivity, biodiversity resilience and wider environmental functions such as climate adaptation and water regulation is recognised. The concern expressed regarding the cumulative pressures arising from the build-out of Adamstown SDZ, Clonburris SDZ and other zonings is therefore noted. However, it is considered that the planning framework for the SDA has been expressly structured to respond to these biodiversity and green infrastructure sensitivities, rather than to disregard them. In particular, Amendment Ref. No. 17 introduces a Specific Local Objective (SLO) which requires the protection and enhancement of the Green Infrastructure Corridor along the western boundary with Kildare and the Grand Canal Corridor pNHA as a fundamental element of any future planning of the SDA lands. The SLO explicitly requires that appropriate, ecologically informed buffers to both the green infrastructure corridor and the Grand Canal pNHA will form part of any development proposals. This establishes biodiversity and green infrastructure as a required structuring principle, rather than a residual consideration. It is important to emphasise that the designation of the lands as a Future Strategic Long-Term Development Area does not facilitate immediate development. Rather, it provides a plan-led mechanism

committed and delivered road infrastructure upgrades. Overall, submissions contend that the existing road network lacks the capacity to accommodate further large-scale residential development, particularly within the SDA, without significant and clearly defined investment in transport infrastructure. The cumulative impact of existing development, combined with the potential activation of the SDA, is presented as a key concern, with many submissions stating that further development would intensify congestion and worsen traffic conditions across the wider Lucan Adamstown area unless addressed through a comprehensive, infrastructure led approach. The Cairn Homes submissions, as outlined in the DBFL Technical Notes identify feasible access solutions via the R120 / Lucan Sarsfields GAA access road, including signalised junction upgrades and compliance with DMURS and CDP standards. The Western Dublin Orbital Road is identified as a critical long-term structuring route, strengthening the case for frontage-led future zoning. Phased road upgrades are presented as capable of accommodating early development without reliance on speculative infrastructure. **Parking**	through which constraints analysis, ecological assessment and green infrastructure strategy must be undertaken in advance of any masterplanning or rezoning. The SLO requires that future proposals are informed by a comprehensive understanding of ecological assets, connectivity functions and environmental carrying capacity. In this context, the issues raised by submitters are intended to be addressed proactively through evidence-based studies at masterplan stage, including ecological surveys, habitat assessments and green infrastructure mapping, rather than retrospectively mitigated. The submissions from Cairn Homes and Flood Crowley Partnership are noted in this regard. While acknowledging the ecological sensitivity of the lands, these submissions do not seek to diminish the role of biodiversity or green infrastructure. On the contrary, they promote a landscape-led, biodiversity-integrated approach, in which green infrastructure operates as the primary framework shaping future development within the SDA. These submissions outline the retention and enhancement of existing hedgerows, canal-side habitats and landscape features, and identify the potential to reinforce and extend ecological corridors linking Adamstown SDZ, the Grand Canal and the Liffey Valley. The delivery of biodiversity net gain, habitat enhancement and climate-resilient landscapes through nature-based solutions and long-term stewardship is identified as a key objective of any future development scenario. In addition, the wider Development Plan Green Infrastructure policies, including identified green infrastructure corridors and the statutory protection afforded to the Grand Canal pNHA, will apply in full to any future plan making within the SDA. Development will therefore be required to demonstrate consistency with county-wide green infrastructure objectives, Water Framework Directive requirements, and

Parking is raised across submissions as a significant and growing issue within the Adamstown Lucan area, closely linked to the cumulative scale and density of development associated with Adamstown SDZ, Clonburris SDZ, non-SDA variation sites, and the proposed Adamstown South & West (Outer) Strategic Development Area (SDA). Submissions consistently describe parking pressure as an existing problem within Adamstown SDZ, particularly in newer residential developments characterised by lower car-parking ratios, and express concern that the inclusion and eventual development of the SDA would further exacerbate these issues. Many submissions refer to widespread overspill parking onto residential streets, obstruction of footpaths and cycle lanes, and resulting conflicts between residents, pedestrians and cyclists. Specific locations within Adamstown SDZ, such as Tandy Lane and The Crossings, are cited as examples where parking demand routinely exceeds supply, leading to compromised pedestrian safety, reduced accessibility for people with disabilities, and difficulties for emergency service access. Parking pressures are also highlighted in the vicinity of schools and transport nodes, where congestion associated with set-down and pick-up activity is said to worsen local traffic conditions and safety risks. Submissions further note the lack of adequate electric vehicle (EV) charging provision, which is	biodiversity protection measures, ensuring that ecological connectivity and environmental quality are not only safeguarded but strengthened. Given the long-term horizon of the SDA, it is considered essential that detailed scrutiny of environmental constraints, ecological features and green infrastructure opportunities forms an integral part of any future framework or masterplan. The purpose of the SDA designation and the accompanying SLO is to ensure that biodiversity and green infrastructure considerations are addressed up-front, strategically and cumulatively, thereby avoiding piecemeal erosion of ecological assets and ensuring a positive environmental outcome in the context of any future growth. In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. Furthermore, should any future proposal(s) on the lands arise in the future, after a plan making and zoning process, they would remain subject to a variety of assessment through the development management process and be required to meet the appropriate CDP Policies and Objectives. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA

viewed as increasingly problematic in the context of climate and transport policy objectives. These concerns are framed in strongly cumulative terms. Submissions argue that the parking issues currently evident within Adamstown SDZ reflect a broader mismatch between residential density, transport provision and parking standards. In this context, it is contended that additional development associated with the Outer SDA would place further strain on local streets and exacerbate parking conflicts unless addressed comprehensively. At the same time, submissions from landowners and consultants, including those representing interests within the SDA, acknowledge existing parking pressures but present a contrasting perspective grounded in a Transit Oriented Development (TOD) approach. These submissions imply that parking provision should be considered within the context of reduced car dependency, supported by proximity to Adamstown Railway Station, existing commuter rail services, planned DART+ South West upgrades, BusConnects corridors, and enhanced walking and cycling connections to the Grand Canal Greenway and surrounding employment areas such as Grange Castle. Rather than car-led layouts, these submissions emphasise managed parking strategies, modal shift, and high-quality active travel infrastructure as the basis for accommodating future demand.	**Environment** The environmental issues raised in submissions have been carefully considered in the context of the proposed Adamstown South & West (Outer) Strategic Development Area (SDA), the existing pattern of development in the Lucan Adamstown area, and the applicable national, regional and local planning policy framework. It is acknowledged that submissions consistently highlight concerns regarding the cumulative environmental impacts arising from the scale, pace and concentration of development associated with Adamstown SDZ, Clonburris SDZ and other zoned lands in the wider Lucan area. Issues raised include perceived deterioration in air quality, increased noise and light pollution, loss of landscape character, and reduced access to natural and semi-natural environments. The importance of lands at St. Edmundsbury and adjoining areas within the Outer SDA as valued “quiet” landscapes providing visual relief, recreational amenity and environmental respite for surrounding communities is noted, particularly given their role during recent periods when access to nearby natural environments was essential to wellbeing. However, it is important to recognise that the designation of the lands as a Future Strategic Long-Term Development Area does not provide for immediate development, nor does it pre-determine the scale, form or timing of future growth. Instead, it establishes a plan-led, precautionary framework through which environmental capacity, constraints and opportunities must be comprehensively assessed in advance of any rezoning. This approach is consistent with National Policy Objective (NPO) 1 of the National Planning Framework (NPF), which requires that all plans, projects and activities arising from the NPF be subject to the relevant environmental assessment processes,

Supporting documentation accompanying these submissions suggests that, if development within the SDA is progressed in a phased and masterplan-led manner, parking provision can be aligned with sustainable transport objectives and integrated with wider mobility measures. However, even within these supportive submissions there is an implicit recognition that parking must be addressed at a strategic and cumulative level, rather than on a site-by-site basis, to avoid repeating the issues experienced within Adamstown SDZ. Overall, parking is presented as a clear indicator of the wider pressures arising from the concentration of development in the Lucan Adamstown area. While submissions from existing residents highlight current deficiencies and oppose further development on this basis, landowner and consultant submissions view the SDA as an opportunity to apply a more coherent TOD-based approach. Nonetheless, the prevailing concern remains that, without robust, cumulative and enforceable measures, the addition of the SDA to existing SDZs and zonings would intensify parking pressures and associated amenity and safety impacts. **Biodiversity and Green Infrastructure** Biodiversity and green infrastructure considerations form a strong and recurring theme across submissions relating to Adamstown SDZ West and	including Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), Strategic Flood Risk Assessment (SFRA) and Appropriate Assessment (AA), as appropriate. Submissions appropriately emphasise the need to consider environmental impacts at a cumulative scale, rather than on a piecemeal basis. In this regard, the SDA framework explicitly aligns with NPO 11 of the NPF, which requires that planned growth at a settlement level be determined at Development Plan-making stage and assessed having regard to the receiving capacity of the environment, including broader environmental considerations beyond housing targets alone. The long-term nature of the SDA designation enables this strategic assessment to take place in advance of development, rather than retrospectively. The submissions from Cairn Homes and Flood Crowley Partnership are noted as setting out an environmentally-led vision for Adamstown South, which places blue-green infrastructure, Sustainable Drainage Systems (SuDS), landscape-led design and high-quality public realm as primary structuring elements of any future development. This approach is consistent with the objectives of the South Dublin County Development Plan 2022 2028, in particular Chapter 4 (Green Infrastructure), which seeks to promote an integrated green infrastructure network that enhances biodiversity, improves climate resilience and supports environmental, social and economic wellbeing, and Chapter 11 (Infrastructure and Environmental Services), which aims to secure high-quality environmental services to protect health, wellbeing and the County's long-term sustainability. A submission has been made by Inland Fisheries Ireland (IFI), whose observations are fully acknowledged. IFI focus on the protection of

the Adamstown South & West (Outer) Strategic Development Area (SDA), with particular emphasis on lands at St. Edmundsbury, Aderrig West and Finnstown. These areas are consistently described as constituting a critical component of a wider, interconnected green network extending along the River Liffey, the Grand Canal corridor, and adjoining agricultural, amenity and transitional lands separating Adamstown SDZ from Lucan Village and the wider hinterland. Submissions highlight the presence of mature hedgerows, historic field boundaries, woodland patches, canal-side habitats and semi-natural grasslands, which are said to support a range of wildlife species and provide essential ecological connectivity at a local and catchment scale. A recurring concern is the cumulative impact of existing and proposed development on this green infrastructure network. Submissions argue that the progressive build-out of Adamstown SDZ, Clonburris SDZ and other zoned lands has already reduced the extent and functionality of green corridors in the wider area, increasing pressure on the remaining undeveloped lands within Adamstown SDZ West and the Outer SDA. In this context, the SDA lands are described as playing an increasingly important buffering role, mitigating the urbanising effects of surrounding development, maintaining separation between settlements, and preserving ecological linkages between the Liffey Valley, the Grand Canal	surface waters, aquatic habitats and water quality within the Liffey catchment, including tributaries such as the Lucan Stream which traverse or adjoin lands within Adamstown SDZ West and the Outer SDA. IFI emphasise compliance with the Water Framework Directive, stating that development must not result in deterioration of any waterbody nor compromise the achievement of good ecological status. Of particular importance is IFI's emphasis that cumulative environmental impacts arising from phased and multi-site development must be assessed and managed collectively, rather than through isolated project-level responses. IFI also draw attention to environmental risks during construction, including sediment runoff, pollution incidents and disturbance of riparian habitats, and advise that robust Construction Environmental Management Plans will be required at planning application stage. In this context, Amendment Ref. No. 17 introduces a Specific Local Objective (SLO) which is considered a critical environmental safeguard. The SLO requires the protection and enhancement of the Green Infrastructure Corridor along the western boundary with Kildare and the Grand Canal Corridor pNHA, and explicitly provides for the incorporation of appropriate, ecologically informed buffers as part of any future development proposals. This objective directly responds to the issues raised by IFI and other submitters, ensuring that green infrastructure protection, water quality, ecological connectivity and landscape character are not treated as secondary mitigation measures, but as fundamental structuring elements of any future development framework. It is considered appropriate to further strengthen the environmental clarity of the SLO by explicitly referencing the requirement that any future masterplan or development framework for the SDA be informed

and the wider countryside. It is contended that rezoning and subsequent development of these lands, when considered cumulatively with existing SDZs and other zonings, would fragment habitats, reduce biodiversity resilience, and erode the integrity of the green infrastructure network in a manner that would be difficult or impossible to reverse. Several submissions refer to local ecological surveys, field observations and anecdotal evidence of species presence, including the use of hedgerows and watercourse corridors as movement routes for fauna. These submissions emphasise that the remaining undeveloped lands function not merely as residual open space but as active elements of a living ecological system, contributing to water regulation, climate resilience, carbon sequestration and overall environmental quality. The irreversible nature of potential habitat loss is repeatedly highlighted, with many submissions asserting that safeguarding these lands should form a core element of the County's green infrastructure strategy, particularly in light of the scale of existing and planned development in the wider Lucan Adamstown area. At the same time, submissions from Cairn Homes and Flood Crowley Partnership provide a complementary perspective, acknowledging the ecological sensitivity of the lands while advocating a landscape-led and biodiversity-integrated approach to any future development within the SDA. These submissions	by comprehensive environmental baseline studies, including ecological, hydrological and water quality assessments, and that such studies be undertaken in advance of rezoning and inform land use. This refinement would reinforce the precautionary intent of the SLO and ensure that development capacity is established with full regard to environmental limits and opportunities. The Council also notes that Development Plan objectives under Sustainable Neighbourhoods, CS6 Objective 5 (promoting sustainable travel and high-quality pedestrian and cycling environments where adequate transport links are in place or planned) and CS6 Objective 6 (supporting compact growth and sustainable densities to enable a just transition to a climate-resilient, biodiversity-rich and carbon-neutral economy) will apply in full to any future plan making within the SDA. These objectives further ensure that environmental considerations are integrated with settlement planning, transport, climate action and infrastructure delivery. With regard to the comments from the DHLGH/NPWS, these issues will be dealt with through preliminary assessments undertaken to inform plan making in the future. Future public and stakeholder consultation will be carried out in any plan making process to ensure that the required buffers, safeguarding and mitigation measures are made in line with the comments received and aligned with best practice approaches. In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through

emphasise the retention and enhancement of existing hedgerows, canal-side environments and landscape features, and propose that green infrastructure should operate as the primary structuring framework for development rather than as a residual component. Reference is made to the potential for delivering biodiversity net gain, enhanced habitat connectivity, and climate-resilient landscapes through careful masterplanning, nature-based solutions and long-term management. In this context, the Outer SDA is presented as an opportunity to reinforce and extend existing green corridors linking Adamstown SDZ to the Grand Canal and Liffey Valley, provided that development is phased, comprehensive and guided by a robust green infrastructure strategy. Taken together, submissions on biodiversity and green infrastructure consistently situate the issue within a cumulative and strategic context, highlighting the increasing importance of the Adamstown SDZ West and South & West (Outer) lands as remaining components of a wider ecological network. While many submissions oppose rezoning on the basis of potential harm to these functions, supportive submissions contend that, if development is to be contemplated in the longer term, it must be firmly grounded in the protection, enhancement and integration of green infrastructure, ensuring that the cumulative impacts of surrounding SDZs and zonings are mitigated rather than exacerbated.	a plan-led approach, include the assessment of existing or potential historic structures. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA **Schools** The concerns raised regarding school capacity in the Adamstown Lucan area have been carefully considered in the context of existing and proposed development, national and local planning policy, and the statutory roles of the relevant authorities. It is acknowledged that submissions consistently identify pressure on primary and post-primary school capacity within the Adamstown Lucan area and express concern regarding reliance on temporary accommodation, long waiting lists and uncertainty around future secondary school provision. The relationship between school capacity, traffic congestion during set-down and pick-up periods, and wider road safety issues is also noted. These concerns reflect the experience of a high-growth area undergoing the phased delivery of major development proposals, particularly Adamstown SDZ and Clonburris SDZ, both of which are not yet fully built out and continue to require the delivery of planned schools. The National Planning Framework (NPF) recognises that certain areas of the country, including parts of the Dublin Metropolitan Area, are experiencing significant pressure on schools as a result of sustained population growth. The NPF emphasises that schools play a vital role in the development of sustainable communities, acting as a key enabler

Environment Environmental considerations are raised consistently across submissions relating to Adamstown SDZ West and the Adamstown South & West (Outer) Strategic Development Area (SDA), with a strong emphasis on the cumulative environmental impacts arising from existing and proposed development in the wider Lucan Adamstown area. Submissions describe a perceived steady decline in environmental quality associated with the ongoing build-out of Adamstown SDZ, development at Clonburris SDZ, and additional rezonings across Lucan, which together are said to have increased traffic emissions, construction activity and pressure on remaining open lands. Specific issues frequently cited include deteriorating air quality, increased noise and light pollution, loss of landscape character, and reduced access to natural environments, all of which are described as adversely affecting residents' quality of life. Particular reference is made to St. Edmundsbury and other nearby variation sites, as well as those proposed which are adjoining lands within the Outer SDA, which are described as functioning as important "quiet" landscapes providing environmental respite, visual relief and recreational value for surrounding communities. Submissions note that these areas assumed heightened importance during recent periods of restricted movement, when access to nearby natural environments was essential for	for housing delivery, and stresses the importance of strategic alignment between land-use planning and education investment to avoid pressure on school places that could otherwise constrain development. The NPF further notes that while national enrolment trends may fluctuate, there remains an ongoing need for new schools and additional school places in high-growth urban areas, particularly at post-primary level, and that provision for special educational needs is an increasingly important consideration. In this context, the proposed Adamstown South & West (Outer) Strategic Development Area (SDA) does not facilitate immediate residential development, but rather identifies a long-term growth location to be considered in a structured manner beyond the current Development Plan period. The SDA framework allows for early and coordinated engagement with the Department of Education and Youth, ensuring that future school requirements are identified, planned and delivered in advance of, or in tandem with, any future development. This approach aligns with National Policy Objective 41, which prioritises the alignment of population growth with the timely delivery of schools and childcare facilities on well-located sites as a key enabler of sustainable communities. At County level, the South Dublin County Development Plan 2022 2028 provides a strong policy framework to address the concerns raised. The Council has engaged extensively with the Department of Education in the preparation of the Plan to identify school needs at neighbourhood level based on the population growth identified in the Core Strategy. The Department of Education continues to monitor demographic change through a nationwide GIS-based review process, and where pressures are identified, provision is made either through new schools or expansion of existing facilities. This approach is

physical and mental wellbeing. It is argued that continued development of remaining greenfield lands within the SDA, when considered cumulatively with existing SDZs and zoned lands, would result in a net reduction in environmental quality and access to nature for both current and future residents, further intensifying the urbanised character of the area. The cumulative effect of multiple rezonings is a recurring concern. Submissions argue that the incremental loss of greenfield and semi-natural lands is creating an increasingly constrained and built-up environment, undermining the long-term environmental sustainability of the Lucan Adamstown area. These impacts are framed not as site-specific issues, but as outcomes of the scale, concentration and sequencing of development across the wider area, with fears that the proposed inclusion and activation of the SDA would exacerbate trends already evident within existing SDZs. Within this context, submissions from Cairn Homes and Flood Crowley Partnership present an alternative perspective, describing the vision for Adamstown South as environmentally-led, with environmental protection and enhancement embedded as core structuring principles. These submissions emphasise the integration of blue-green infrastructure, Sustainable Drainage Systems (SuDS), landscape-led design and high-quality public realm as fundamental to any future development approach within the SDA.	reinforced through Policy COS8, which commits the Council to working in conjunction with the Department of Education to promote and support the provision of schools, actively identify suitable sites, and review school provision following the availability of updated Census data. The CDP also recognises the wider role of schools as community hubs, with potential for shared use of facilities, childcare provision, and integration with active travel initiatives, supporting broader social and sustainability objectives. In this regard, landowner and consultant submissions associated with the SDA acknowledge the importance of schools and social infrastructure and emphasise that future development would be masterplanned to integrate education provision with housing, transport and community facilities in a coordinated manner. Concerns regarding the timing and certainty of school delivery are understood, particularly in light of past experience in high-growth areas. However, it is considered that the identification of the SDA provides an important mechanism to ensure that future school requirements are anticipated early, allowing sufficient lead-in time for site identification, design, funding and construction, in collaboration with the Department of Education and other stakeholders. In this regard, it is the intention that future phasing and masterplanning frameworks for the SDA will link the delivery of school capacity and associated social infrastructure to the progression of development, ensuring that provision occurs in tandem with significant residential occupation. In summary, while existing pressures on school capacity in the Adamstown Lucan area are acknowledged, it is considered that the

Rather than treating environmental measures as mitigation, they propose that drainage corridors, open space, landscape character and amenity should shape the development framework from the outset, supporting climate resilience, biodiversity enhancement and long-term environmental performance. A specific and influential contribution is provided by Inland Fisheries Ireland (IFI), whose submission focuses on the protection of surface waters, aquatic habitats and water quality within the Liffey catchment, including tributaries such as the Lucan Stream which traverse or adjoin lands within Adamstown SDZ West and the Outer SDA. IFI stress the requirement to comply with the Water Framework Directive, stating that development should not result in deterioration of any waterbody nor compromise the achievement of good ecological status. Importantly, IFI emphasise that cumulative impacts arising from phased and multi-site development must be assessed and managed collectively, rather than on a piecemeal or application-by-application basis. IFI also draw attention to environmental risks associated with construction activity, highlighting the potential for sediment runoff, pollution incidents, and disturbance of channels and riparian habitats during site works. They advise that robust construction environmental management measures	current Development Plan, the statutory SDZ frameworks, and national education planning mechanisms provide a robust and coordinated basis for the delivery of schools in line with population growth. The long-term nature of the SDA ensures that any future development will be subject to infrastructure-led phasing, with school provision remaining a key determinant of development capacity, phasing and sequencing, consistent with national policy and the objectives of the South Dublin County Development Plan. **Community and Social Infrastructure:** The concerns raised in submissions regarding community and social facilities have been carefully considered in the context of the existing and planned development pattern within the Lucan Adamstown area, the statutory frameworks governing Strategic Development Zones (SDZs), the proposed Strategic Development Area (SDA), and the relevant national and local policy objectives. It is acknowledged that submissions consistently identify pressure on community and social infrastructure in the Adamstown Lucan area, citing deficits in healthcare and GP capacity, childcare provision, leisure and sports facilities, youth services, libraries, cultural amenities and emergency services. The experience within Adamstown SDZ, where certain facilities indicated at earlier stages of the Planning Scheme such as a publicly accessible swimming pool and wider leisure amenities have not yet been delivered, is noted. This has contributed to a perception that social infrastructure delivery has not always progressed in step with residential development, resulting in existing facilities operating under increasing strain and serving larger catchments than originally envisaged.

should be mandatory at planning application stage, including controls on earthworks, material storage, and works in proximity to watercourses. These requirements are framed as essential safeguards should development within the SDA be progressed in the future. Taken together, submissions on environmental matters consistently situate Adamstown SDZ West and the South & West (Outer) SDA within a broader context of cumulative environmental pressure, arising from the concentration of SDZs and zoned lands in the Lucan Adamstown area. While many submissions emphasise degradation of environmental quality and oppose further rezoning on this basis, others acknowledge that, if development of the SDA is to occur in the longer term, it must be guided by a comprehensive, environmentally-led framework that protects water quality, safeguards landscape character, integrates blue-green infrastructure, and addresses cumulative impacts across the wider area rather than in isolation. A submission was also received from the DHLGH DUA NPWS unit with regard heritage-related (mostly environmental) observations/recommendations. In summary these were that the proposed variation involves the rezoning of approximately 156 hectares of land for residential development, including areas currently designated as Rural, Open Space, and High Amenity. This raises an overarching concern	The cumulative nature of these pressures is recognised. Submissions highlight that the combined effect of development across Adamstown SDZ, Clonburris SDZ, non-SDA variation sites, and the proposed Adamstown South & West (Outer) SDA must be considered collectively, rather than in isolation. In this regard, the Council acknowledges that rapid population growth across multiple sites places increasing demands on community infrastructure and that the timely delivery of such facilities is critical to community wellbeing, social cohesion and overall quality of life. However, it is important to emphasise that Adamstown SDZ and Clonburris SDZ are statutory, plan-led growth areas, with adopted Planning Schemes that provide for the phased delivery of community and social infrastructure alongside residential development. These schemes include provisions for community centres, public open space, recreational facilities, schools and other amenities, and remain the primary mechanisms through which infrastructure delivery is secured. The Council has recently improved community and social infrastructure in the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House and the continued development of Griffeen Park. In response to the zoning of lands, the Council will adapt current strategies and bring forward future capital projects. While delivery timelines may extend beyond initial residential occupation, these Planning Schemes continue to guide the coordinated provision of facilities.

regarding the likely reduction in biodiversity across multiple sites, with potential impacts on species such as badgers, bats, otters, amphibians, birds, and protected plant species. Key risks identified include habitat loss, disturbance from inappropriate lighting (particularly affecting bats), and encroachment into sensitive ecological corridors. To address these issues, it is recommended that biodiversity protection be fully integrated into all development proposals, that lighting in sensitive areas be designed to be bat-friendly, motion-activated, and avoid spill into natural habitats, and that strong ecological buffers—especially near protected areas—be maintained or enhanced. Furthermore, all development should be guided by comprehensive ecological assessments to ensure informed and sustainable outcomes. Further to this, the NPWS notes that a 50 m buffer along the Grand Canal pNHA was originally agreed during rezoning, but this has not been consistently maintained in parts of the business park. To compensate for this encroachment, it recommends a 100 m ecological buffer north of the canal when planning future development of the Adamstown South and West lands. The Adamstown South and West lands are identified as a Future Strategic Development Area beyond 2028 and lie adjacent to the ecologically sensitive Grand Canal pNHA at Gollierstown, an area of very high biodiversity value. This includes habitats supporting species such as otter, smooth newt, the	In relation to the proposed Adamstown South & West (Outer) SDA, it is reiterated that this designation does not facilitate immediate residential development. Rather, it establishes a long-term strategic framework intended to allow sufficient lead-in time for planning, funding and delivery of community and social infrastructure in advance of future development. This approach aligns with the National Planning Framework, which places particular emphasis on consolidating and completing the development of areas that have experienced significant growth in recent decades, while prioritising infrastructure and amenity provision in larger commuter towns through targeted investment under the National Strategic Outcomes. National policy further recognises that community, health and social infrastructure are critical components of sustainable urban development. The NPF highlights the role of community interaction, access to services and amenities, and the creation of attractive, liveable urban places as fundamental to quality of life, as reflected in National Policy Objective 12, which seeks to ensure the creation of high-quality urban places that support diverse and integrated communities. The NPF also places strong emphasis on the expansion of community and primary care services, the delivery of healthcare infrastructure in line with Sláintecare, and the development of facilities that support active lifestyles, ageing populations and inclusive communities. At local level, the South Dublin County Development Plan 2022 2028 provides a comprehensive policy framework to ensure that community and social infrastructure is planned and delivered in a coordinated manner. Chapter 8 (Community Infrastructure and Open Space) and Chapter 12 (Implementation and Monitoring) set out standards and requirements for community centres, healthcare facilities, childcare, public open space and recreational amenities. Policy COS2 commits

protected snail *Vertigo moulinsiana*, kingfisher, teal, yellow meadow ants, multiple bat species, and badger setts. There is concern that previous development in the area has already encroached on the originally intended 50m ecological buffer. While there is support for existing policy (CS3 SLO 1) aimed at protecting and enhancing green infrastructure and the canal corridor, it is recommended that a wider ecological buffer of 100m be implemented along the north side of the canal. Future masterplanning for the area should incorporate robust, ecologically informed buffer zones to ensure the protection of these sensitive habitats. **Schools** School capacity is consistently identified across submissions as a critical constraint within the Adamstown Lucan area, and one that is intrinsically linked to the cumulative scale of existing and proposed development, including Adamstown SDZ, Clonburris SDZ (not yet fully built out and not all schools delivered), and the proposed Adamstown South & West (Outer) Strategic Development Area (SDA). Submissions state that both primary and post-primary schools are currently operating at or beyond capacity, with widespread reliance on temporary classroom accommodation, reduced outdoor play and recreational space within school grounds, and long waiting lists for enrolment. Many families report ongoing difficulty in securing school	the Council to working closely with the Health Service Executive, Department of Education and other relevant agencies to meet the necessary provision of community infrastructure in line with population growth, while Policies H7 and related objectives emphasise high-quality residential environments supported by appropriate amenities. The future planning of the SDA will be required to comply with the CDP approach. The Council is also committed to pursuing a range of funding and delivery mechanisms to facilitate community infrastructure provision, including development contributions under the Development Contribution Scheme, targeted grant funding, partnership with other public bodies, and collaboration with private sector interests where appropriate. These mechanisms will apply to any future development within the SDA, ensuring that community and social facilities form an integral part of the overall development framework. Submissions from landowners and consultants, including those with interests in the SDA, acknowledge existing deficits but present the SDA as an opportunity to address these through a masterplan-led, integrated approach. These submissions emphasise embedding healthcare facilities, community spaces, sports and leisure infrastructure, cultural and recreational amenities at the core of future development, rather than as afterthoughts. Engagement with local stakeholders, both sporting and cultural, such as Lucan Sarsfields GAA Club, is noted as indicative of an intent to support shared-use facilities and community integration, consistent with national policy which recognises schools and community facilities as potential hubs for broader social and recreational use.

places locally, with particular concern expressed regarding access to secondary education as existing cohorts progress through the system. Traffic congestion around schools, especially during morning drop-off and afternoon pick-up times, is highlighted as a significant and growing safety issue. Submissions reference congested local roads, inadequate set-down facilities, and conflicts between vehicles, pedestrians and cyclists, which are described as having worsened as residential development has expanded in the area. These conditions are linked directly to the scale and pace of development across Adamstown and surrounding areas, with schools described as struggling to cope with the cumulative impact of population growth. Submissions consistently argue that any further residential development within the SDA, when considered alongside the ongoing build-out of Adamstown SDZ, Clonburris SDZ and other zoned lands, would further intensify demand for school places and exacerbate existing pressures unless additional schools are delivered and operational in advance. A recurring concern is the uncertainty surrounding the timing, location and delivery of future school provision associated with proposed rezonings and long-term development areas. While new schools are acknowledged in strategic plans, submissions emphasise that there is limited confidence that these facilities will be delivered in	In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Policy** The policy-based concerns raised in submissions, particularly those relating to phasing, settlement consolidation, and alignment with national and regional planning objectives, have been carefully considered in the context of the statutory planning framework and the long-term strategic role of the Adamstown South & West (Outer) Strategic Development Area (SDA). It is acknowledged that submissions express concern that the progression of additional lands, while Adamstown SDZ and Clonburris SDZ remain incomplete, could undermine the principles of plan-led, infrastructure-first development. Concerns are noted that development could advance ahead of the delivery of key services such as public transport, schools, utilities and community facilities, particularly where phasing is perceived to be linked to the commencement rather than the operational delivery of infrastructure. The Council recognises that these concerns arise from lived experience in high-growth areas and that confidence in long-term planning outcomes is dependent on robust phasing mechanisms. The Planning Authority acknowledges the

step with residential occupation, based on past experience. A submission was received from the Department of Education and Youth with regards to the Lucan, Adamstown and Palmerstown in response to the additional zoning in the Adamstown area (including Tubber Lane). The Department indicated that the population expansion would likely generate demand for at least two additional primary schools, together with further post-primary provision, depending on demographic factors and the extent to which projected growth materialises. In this context, the Department emphasises the importance of ongoing coordination between South Dublin County Council and the Department of Education and Youth to plan for school capacity in the Lucan–Adamstown–Palmerstown area and welcomes continued engagement on this matter. Overall, schools are presented as a clear example of how cumulative development across the wider Lucan Adamstown area has outpaced the delivery of essential social infrastructure. Submissions therefore call for a more cautious and infrastructure-led approach, with explicit sequencing requirements to ensure that school capacity is provided ahead of, or at least concurrently with, any further large-scale residential development associated with the SDA or other zoning proposals.	experience of infrastructure and service delivery in Adamstown SDZ and will ensure that lessons learned from the timing and sequencing of previous plans are fully integrated into any future planning. However, it is important to emphasise that the National Planning Framework (NPF) explicitly operates as a long-term, adaptive strategy, informed by ESRI projections and subject to phased review. The NPF recognises that population growth to 2040 will be front-loaded to 2030, while also allowing flexibility to respond to updated Census data and unforeseen circumstances. Importantly, the NPF makes clear that the Metropolitan Area Strategic Plans (MASPs) are the appropriate vehicles to address detailed phasing at a metropolitan scale, allowing for a transition period during which investment in infrastructure and regeneration can facilitate compact growth. Within this framework, the identification of Adamstown South & West (Outer) as an SDA is not a departure from policy, but a direct implementation of national guidance. The Development Plans Guidelines for Planning Authorities (2022) explicitly provide for the identification of Long-Term Strategic and Sustainable Development Sites / Opportunity Areas where lands are not likely to be developed within the current plan period but are required to meet longer-term growth needs. This approach is intended to give clarity and certainty, avoid ad-hoc rezoning, and allow sufficient lead-in time for environmental assessment, infrastructure planning and engagement with service providers. The SDA designation is therefore strategic, precautionary and future-focused. It does not confer immediate development rights, nor does it override the priority completion of existing SDZs. Adamstown SDZ and Clonburris SDZ remain statutory, plan-led growth areas, each

Community and Social Community and social facilities are identified across submissions as a significant and ongoing constraint in the Adamstown Lucan area, and one that is closely linked to the cumulative impact of development associated with existing Strategic Development Zones (SDZs), non-SDA variation sites, and the proposed Adamstown South & West (Outer) Strategic Development Area (SDA). Submissions consistently refer to a wide range of deficits in community infrastructure, including healthcare and GP capacity, cultural facilties, childcare provision, leisure and sports facilities, youth services, libraries, cultural amenities, and emergency services, with many stating that these services have not kept pace with population growth. A recurring concern relates to the existing situation within Adamstown SDZ, where submissions point to the non-delivery or delayed delivery of facilities promised at earlier stages of the SDZ, most notably a publicly accessible swimming pool and broader recreation and leisure amenities. This experience is cited repeatedly as evidence of a systemic failure to align residential development with the timely provision of social infrastructure. As a result, existing facilities are described as already operating under significant strain, serving larger populations than originally envisaged, and struggling to meet day-to-day demand.	governed by approved Planning Schemes that include detailed phasing provisions and infrastructure delivery requirements. These schemes continue to regulate development and remain the primary mechanisms for delivering housing, schools, parks, transport infrastructure and community facilities in those locations. Crucially, the SDA has been identified because of its proximity to Adamstown Railway Station and its alignment with Transport Oriented Development (TOD) principles, rather than as a generic greenfield expansion. The NPF is clear that Dublin must accommodate a greater proportion of its growth within its metropolitan area, in a more compact urban form, supported by high-capacity public transport. National Policy Objectives NPO 10 and NPO 97 explicitly support large-scale TOD at suitable locations along existing and planned high-capacity rail corridors. Adamstown South meets these criteria by virtue of its contiguity with the existing built-up area, adjacency to a strategic rail hub, and its capacity to be integrated into the metropolitan settlement structure. The Council also notes that the selection of greenfield lands for long-term growth does not conflict with compact growth objectives where such lands are immediately adjacent to the existing urban footprint and are served by, or capable of being served by, high-capacity public transport. This approach avoids dispersed or leap-frog development and instead supports the sequential consolidation of an established settlement, consistent with both national policy and the Core Strategy of the County Development Plan. In terms of phasing, it is emphasised that any future development of the SDA will be masterplan-led, subject to full environmental assessment, and governed by either Specific Local Objectives (SLOs),

Submissions argue that further residential development within the Adamstown South & West (Outer) SDA, when considered alongside the ongoing build-out of Adamstown SDZ, Clonburris SDZ, and other non-SDA zoned lands introduced through recent variations, would compound these deficits unless community and social infrastructure is delivered in advance. The issue is framed explicitly in cumulative terms, with submitters highlighting that rapid population growth across multiple sites has not been matched by a commensurate expansion in healthcare, community, cultural or recreational facilities. This is described as having a tangible impact on community wellbeing, social cohesion, and quality of life, particularly for families, older residents and young people. Many submissions express concern that the proposed SDA would add a further layer of demand onto an already constrained system, intensifying pressure on primary care services, childcare availability, indoor and outdoor recreation facilities, and local community spaces. Particular concern is raised regarding the ability of existing services to absorb additional population growth without clear, funded and time-bound commitments to new facilities. The absence of certainty around when, where and how community infrastructure would be delivered in tandem with SDA development is presented as a key risk, informed by past experience in Adamstown SDZ.	an area-based plan, or other statutory planning mechanisms, depending on the scale and timing of development. These tools will ensure that phasing is explicitly tied to infrastructure delivery, including public transport (notably DART+ South West), schools, community facilities, utilities, open space and environmental capacity. This approach directly reflects the guidance in the Section 28 Implementation Guidelines, which state that specific phasing policies should be set out for long-term strategic sites to ensure infrastructure is delivered in tandem with development and that environmental carrying capacity is fully addressed. Accordingly, the policy framework envisaged for the SDA provides a clear narrative and defensible basis for future growth, ensuring that development does not proceed in advance of infrastructure, that lessons from existing SDZs are fully integrated, and that growth is aligned with the National Planning Framework, Regional Spatial and Economic Strategy, and the South Dublin County Development Plan. In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. it is considered that the proposed approach represents a measured implementation of national planning policy, balancing the need to complete existing SDZs with the requirement to plan proactively for long-term metropolitan growth. The SDA designation does not undermine sequential development, but rather ensures that future growth occurs in a coordinated, infrastructure-led and environmentally

At the same time, submissions from landowners and consultants, including those representing interests within the SDA, acknowledge these existing deficits and set out a more supportive narrative focused on integrated and masterplan-led delivery of community and social facilities. These submissions place strong emphasis on embedding healthcare facilities, community spaces, sports and leisure infrastructure, cultural amenities and recreational assets at the core of any future development framework for the SDA. Reference is made to engagement with local stakeholders, including Lucan Sarsfields GAA Club, as indicative of a proactive approach to community integration and shared use infrastructure. The SDA is presented in these submissions as an opportunity to address some of the long-standing shortfalls in community provision, provided that delivery is comprehensive, phased and secured alongside residential development. Overall, submissions on community and social facilities emphasise that the issue cannot be considered in isolation from the scale, pace and concentration of development across the wider Lucan Adamstown area. While some stakeholders view the SDA as an opportunity to deliver much-needed facilities through an integrated masterplan approach, the prevailing concern is that, without robust sequencing and enforceable delivery mechanisms, further development associated with the SDA would exacerbate existing deficits arising	responsible manner, consistent with the objectives of the NPF, the Compact Settlement Guidelines, and statutory Section 28 guidance Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Density and Housing** The issues raised in submissions regarding density and housing have been carefully considered in the context of the cumulative development pattern in the Lucan Adamstown area, national and regional planning policy, and the statutory framework of the South Dublin County Development Plan. It is acknowledged that submissions frequently reference Adamstown SDZ as a high-density growth area and express concern that the ongoing build-out of Adamstown SDZ, together with Clonburris SDZ and other recently zoned lands, has placed pressure on infrastructure, transport networks, community services and open space. From this perspective, submissions contend that the inclusion and future development of the Adamstown South & West (Outer) SDA would compound existing residential intensity before current deficits are addressed. Concerns are raised regarding the potential erosion of residential amenity, the balance between built form and green infrastructure, and the risk that additional housing delivery would exacerbate congestion, pressure on schools and community facilities, and environmental constraints if not carefully managed. It is also noted that housing is not raised as a discrete policy issue in terms of mix, tenure or affordability, but rather as part of wider

from Adamstown SDZ, Clonburris SDZ and other zoned lands, with negative consequences for community wellbeing and social sustainability. **Policy** Policy-based concerns, closely intertwined with issues of phasing, are raised consistently across submissions and focus on the perceived misalignment between the proposed rezonings and established national, regional and local planning principles. Submissions argue that the current approach departs from the plan-led, infrastructure-first model underpinning the National Planning Framework, Project Ireland 2040, the Eastern and Midland Regional Spatial and Economic Strategy (RSES), and the County Development Plan. A recurring contention is that the zoning or progression of additional lands, while existing Strategic Development Zones (SDZs) such as Adamstown and Clonburris remain incomplete, undermines the logic of sequential development and increases reliance on future, uncertain infrastructure delivery rather than confirmed, operational capacity. Many submissions maintain that this approach weakens the integrity of long-term planning by effectively allowing development to “run ahead” of infrastructure, particularly in the areas of transport, schools, community facilities and utilities. Concerns are expressed that phasing triggers based on the commencement of infrastructure projects, rather	concerns regarding overdevelopment and cumulative capacity. Many submissions argue that sufficient housing is already zoned and under construction within Adamstown and Clonburris SDZs and that further housing should not be advanced until infrastructure and service provision is demonstrably in place. At the same time, submissions from landowners and consultants present a contrasting policy-aligned position, emphasising the strategic role of Adamstown South, and in particular the Station Transit Oriented Development (TOD) development area, as an appropriate location for compact, higher-density residential development. These submissions contend that Adamstown South is one of a limited number of locations in the County capable of supporting density in a sustainable manner due to its immediate proximity to Adamstown Railway Station, existing rail services, planned DART+ South West upgrades, BusConnects corridors, and high-quality walking and cycling connections. From this viewpoint, density is not pursued in isolation, but as a necessary and proportionate response to support viable public transport, local services and the delivery of a 15-minute neighbourhood. This approach is firmly grounded in national policy. The Compact Settlement and Apartment Guidelines support the application of densities that respond to settlement size, location and place-based context, recognising that the highest densities are appropriate in the most accessible locations, particularly near public transport nodes and interchanges to achieve compact growth. The Guidelines also promote flexibility in housing design and typologies, supporting a wider range of housing forms, including more compact “own-door” housing and apartments at suitable locations, with standards framed as minimums rather than maximums.

than their full delivery and operational availability, are inconsistent with the principles of infrastructure-led development and compact growth. In this regard, policy objections are closely linked to calls for existing phased new towns, namely Adamstown and Clonburris SDZs, to be substantially delivered and consolidated before additional zoned lands are advanced, in order to avoid compounding existing pressures and repeating earlier shortcomings in delivery sequencing. Submissions opposing the proposed variation further argue that the rezoning of greenfield or peripheral lands ahead of brownfield regeneration and consolidation conflicts with compact growth objectives. It is suggested that insufficient justification has been provided to demonstrate why existing zoned and serviced lands cannot meet identified housing and growth requirements within the current plan cycle. The absence of a clear and transparent assessment of cumulative impacts, particularly when considered alongside other recent and proposed rezonings, is identified as a key policy deficiency, with submitters stating that this weakens confidence in the overall strategy. At the same time, a smaller number of submissions, notably from landowners and their consultants, support the broader policy approach of identifying Future Strategic Long-Term Development Areas, provided that strong phasing, green infrastructure	In this regard, the Council emphasises that the identification of the SDA does not set density levels or housing quantum at this stage. Any future plans will be required to comply fully with the South Dublin County Development Plan, including policies on residential amenity, design quality, open space provision and protection of environmental assets, as well as the Sustainable Residential Development Guidelines for Apartments and the Compact Settlement Guidelines. Density, building scale and housing typologies will be considered at masterplan level and at development management having regard to context, accessibility, environmental capacity and supporting infrastructure. The NPF further seeks to ensure that future growth is accommodated in a manner that avoids dispersed sprawl and instead focuses housing delivery at locations that can support Transport Oriented Development. In this context, the selection of Adamstown SDA as a long-term growth area reflects its contiguity with the existing built-up area, its integration with an established SDZ, and its ability to support rail-based, compact growth, rather than representing an isolated greenfield expansion, aligning with national policy. The Council also notes that submissions supporting the SDA emphasise the potential to deliver housing in a masterplan-led, phased and infrastructure-first manner, learning from the experience of existing SDZs. Any future development within the SDA may be subject to Specific Local Objectives (SLOs) or an Area Plan / framework, which would further regulate density, housing mix, phasing and the delivery of supporting infrastructure, ensuring that residential development is balanced with open space, community facilities and environmental protection.

protection and masterplanning principles are applied. These submissions assert that the approach is consistent with the Revised National Planning Framework, the RSES, the Housing Growth Requirements Guidelines (2025), and the compact growth objectives of the County Development Plan. From this perspective, the identification of strategic lands is seen as a necessary step in planning for long-term growth, offering clarity and avoiding unplanned or ad-hoc development. Supportive submissions emphasise that locations such as Adamstown South satisfy a rare combination of policy criteria, including transport-oriented development (TOD) potential, contiguity with existing urban areas, serviceability, and deliverability. Reference is made to Department of Housing TOD studies which have identified these lands as capable of supporting development in the short-to-medium term, subject to appropriate phasing and infrastructure sequencing. Crucially, these submissions acknowledge the lessons from earlier SDZ delivery and argue that a masterplan-led, phased approach, backed by enforceable policy mechanisms, is required to ensure alignment with national and regional policy objectives. Overall, submissions on policy and phasing converge on the need for a clearer, more defensible alignment between zoning decisions, infrastructure delivery, and settlement consolidation. While many	In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. **Utilities** The issues raised in submissions regarding utilities and servicing infrastructure have been carefully considered, having regard to the cumulative development context in the Lucan Adamstown area, national planning policy, and the statutory framework of the South Dublin County Development Plan. Furthermore, submissions have been received from UE and ESB respectively on utilities and infrastructure delivery. It is acknowledged that submissions express concern that utility infrastructure, including wastewater networks, electricity supply, gas, drainage and telecommunications, is already under pressure in parts of the Lucan Adamstown area as a result of the ongoing build-out of Adamstown SDZ, Clonburris SDZ, and other zoned lands. The experience of a perceived lag between residential development and utility upgrades within Adamstown SDZ is noted, and it is recognised that this has contributed to scepticism regarding the capacity of existing networks to accommodate further growth. Concerns regarding electricity grid capacity, including the ability of infrastructure to respond to increased population demand and wider regional projects such as DART+ electrification, are also acknowledged. These concerns are appropriately framed in cumulative terms, and the Council recognises that utilities are critical enabling infrastructure

submissions oppose the proposed variation on the basis that it departs from core policy principles and risks exacerbating cumulative impacts, supportive submissions contend that the policy framework can be consistent with national and regional objectives if growth is carefully staged, infrastructure delivery is secured in advance, and lessons from existing SDZs are fully integrated into the approach. **Density and Housing** Issues relating to density and housing are raised consistently across submissions in the context of the cumulative scale and intensity of development within the Lucan / Adamstown area, rather than through focused commentary on site-specific design, housing mix or tenure. Submissions frequently reference Adamstown SDZ as one of the most densely developed SDZs nationally and argue that the continued buildout of Adamstown SDZ, together with Clonburris SDZ and other recently zoned lands, has already placed significant pressure on infrastructure, transport networks, community services and open space provision. In this context, the proposed inclusion and future development of the Adamstown South & West (Outer) SDA is viewed by many as compounding an already high level of residential intensity. Concerns regarding density focus on the scale implied by submissions and supporting material, including references to high-density apartment	whose capacity constraints can have wide-ranging implications for public health, environmental protection, service resilience and climate objectives. The Council agrees that the delivery of utilities must be coordinated, timely and aligned with development sequencing, rather than retrofitted after occupation. However, it is important to clarify that the designation of Adamstown South & West (Outer) as a Strategic Development Area does not provide for immediate development or rezoning. Rather, it establishes a long-term, plan-led framework which allows for advance planning, engagement with service providers and capacity assessment well before development comes forward. This approach is consistent with the National Planning Framework (NPF), which emphasises sustainable land management, resource efficiency, and the need to consolidate growth in appropriate locations while carefully managing the environmental capacity of the receiving environment. The Council notes the submissions from landowners and their consultants, which are supported by technical documentation, indicating that the SDA benefits from its strategic location adjacent to established infrastructure networks. These submissions identify existing and planned high- and medium-voltage electricity infrastructure, gas and telecommunications services, including strategic assets such as undergrounded high-voltage connections associated with the Western Interface Compound, and multiple utility corridors capable of facilitating phased servicing. From a technical perspective, these studies do not identify insurmountable constraints to infrastructure delivery, subject to appropriate phasing and coordination. The Council considers that a plan-led approach to the SDA is critical in this regard. Any future development of the SDA will be required to be

development and estimates that cumulative rezonings across Adamstown, Clonburris and adjoining lands could add several thousand additional dwellings to the Lucan area over time. Submissions opposing the proposals contend that further intensification, without the prior delivery of infrastructure and services, would exacerbate traffic congestion, strain schools and community facilities, and erode the intended balance between built form, green infrastructure and public open space that underpinned the original SDZ concept. Density is therefore framed as an outcome of cumulative decision making, with fears that incremental increases across multiple sites are leading to an overall level of development that undermines residential amenity and quality of life. Housing as a discrete policy issue such as housing mix, tenure, affordability or delivery mechanisms is not a central focus of submissions. Instead, references to housing are typically made within broader concerns about overdevelopment and infrastructure capacity. Many submissions object to additional housing delivery within the SDA at this time, asserting that sufficient housing is already zoned and under construction within Adamstown SDZ and Clonburris SDZ. It is argued that advancing further housing before addressing existing deficits in transport, schools, community and social facilities, and environmental capacity would compound	informed by comprehensive servicing strategies and coordinated engagement with key infrastructure providers, including Uisce Éireann, ESB Networks, EirGrid and telecommunications providers, at an early stage. This will ensure that infrastructure upgrades are planned and delivered in tandem with development, rather than reactively. The Council will continue to liaise closely with these agencies to ensure that capacity, timing and investment requirements are aligned with spatial planning objectives. The following was received from UE: Issues relating to surrounding sites/Adamstown whereby services or infrastructure may be shared: *'The pumping station is not currently operating at capacity. In addition, upgrades are being advanced to maintain headroom. It is estimated that these should be completed within the lifetime of the CDP'* Wider Capacity Issues: *'Capacity in UE assets changes regularly and is only valid at the point in time that it is assessed. This confirmation occurs at Connection Application stage, submitted by the developer'* In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place. A submission was received from the Electricity Supply Board (ESB) with regard the overall variation, having no site specific objections to the

ongoing problems rather than provide a sustainable solution to housing need. At the same time, submissions from landowners and their consultants present a contrasting perspective on both density and housing within the SDA. These submissions emphasise the strategic role of Adamstown South, particularly the Station Transit Oriented Development (TOD) Precinct, as one of the few locations in the County capable of accommodating compact, higher-density development in a sustainable manner. Supportive submissions argue that density levels broadly comparable to those already established within Adamstown SDZ are appropriate in this specific context due to the immediate proximity of Adamstown Railway Station, existing commuter rail services, planned DART+ South West upgrades, BusConnects corridors, and high-quality walking and cycling connections. From this viewpoint, density is presented not as an end in itself, but as a necessary component to support sustainable transport, viable local services, and the delivery of a 15-minute neighbourhood. In terms of housing delivery, strong support is expressed in landowner and consultant submissions for the provision of up to approximately 2,500 homes within Phase 1 of the Adamstown South lands, and up to 9,000 homes across the wider SDA over time. This is framed as a direct response to South Dublin	proposed variation. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals. In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. Furthermore, should any future proposal(s) on the site arise, they would remain subject to a variety of assessment through the development management process and be required to meet the appropriate CDP Policies and Objectives, specifically, Policies within Chapter 11 (Infrastructure and Environmental Services) emphasise the delivery of high-quality infrastructure networks to support sustainable growth and protect environmental quality, while ensuring that development does not outstrip the capacity of services. In addition to this, CS3 Objective 1: To commence preparatory studies and analysis of the Future SDAs, as identified on the development plan maps, to understand the existing land uses and ecological sensitivities and to inform the preparation of future proposals for rezoning to meet the needs of the County through an holistic approach to plan making. The exact lands to be brought forward as future rezoning may change according to the outcome of these studies.

County Council's quantified housing growth requirements to 2034 and beyond, with submissions highlighting single land ownership, a proven delivery entity, and demonstrated serviceability as factors that materially increase certainty of housing delivery within the plan period and subsequent cycles. While acknowledging wider concerns about cumulative impacts, these submissions argue that housing delivery within the SDA if phased, masterplanned and infrastructure-led can form part of a structured solution to meeting identified housing needs, rather than contributing to uncoordinated sprawl. Overall, submissions on density and housing encapsulate a clear tension between cumulative impact concerns and the strategic case for compact, TOD-led housing delivery within the SDA. While many submissions oppose further intensification on the basis that Adamstown and the wider Lucan area are already highly developed and under pressure, others support the principle of higher-density housing at Adamstown South as an appropriate and policy-aligned response to housing demand, provided that development is carefully phased, comprehensively masterplanned, and accompanied by the timely delivery of infrastructure and services. **Utilities** Utilities are raised across submissions as a significant issue, closely linked to the cumulative scale of development associated with Adamstown SDZ,	Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Water, Wastewater, Flooding and SFRA** The issues raised in submissions regarding water supply, wastewater capacity, surface water management and flood risk have been carefully considered in the context of the cumulative scale of development in the Lucan Adamstown area, the statutory planning framework of the South Dublin County Development Plan 2022 2028, and the requirements of national and EU environmental legislation. It is acknowledged that submissions express concern that wastewater and drainage infrastructure within the wider Adamstown Lucan area is under pressure, with particular reference to historic experience in Adamstown SDZ where the delivery of servicing infrastructure has, at times, lagged behind residential occupation. These concerns are appropriately framed in cumulative terms, having regard to the ongoing build-out of Adamstown SDZ, Clonburris SDZ and other zoned lands, and submissions argue that further large-scale development associated with the SDA would require a high degree of certainty regarding coordinated servicing, delivery timelines and enforceable sequencing. In this regard, it is important to clarify that the designation of Adamstown South & West (Outer) as a Strategic Development Area does not permit immediate development or rezoning. Rather, it establishes a long-term, plan-led framework which enables water and wastewater capacity, surface water management and flood risk to be comprehensively assessed in advance of any future masterplanning, rezoning or development proposals. This approach is consistent with

Clonburris SDZ, other non-SDA variation sites, and the proposed Adamstown South & West (Outer) Strategic Development Area (SDA). Submissions consistently express concern that existing utility infrastructure including wastewater networks, electricity supply, gas, drainage and telecommunications is already under pressure and that further development within the SDA would exacerbate these constraints unless infrastructure upgrades are delivered in advance and in a clearly coordinated manner. A recurring theme in submissions is the historic lag between residential development and utility upgrades within Adamstown SDZ. This experience is cited as evidence that, despite strategic planning frameworks, utility provision has struggled to keep pace with population growth. Submissions reference ongoing pressures on wastewater capacity, electricity demand and drainage systems, and argue that additional zoning within the SDA risks repeating this pattern on a larger scale. Particular concern is expressed regarding electricity grid capacity, with some submissions questioning the ability of existing infrastructure to accommodate both population growth and wider regional demands, including those associated with rail electrification projects such as DART+. From this perspective, the absence of firm, time-bound commitments to utility upgrades is seen as a critical weakness, with submissions stating that no conclusive evidence has been provided to	National Policy Objective 1 and National Policy Objective 11 of the National Planning Framework, which require that environmental carrying capacity and relevant environmental assessments inform development plan-making and subsequent land-use decisions. The Council notes the submissions from Cairn Homes and Flood Crowley Partnership, supported by technical infrastructure assessments, which indicate that the SDA lands are serviced and serviceable in principle. These submissions identify existing foul sewer infrastructure traversing the lands, a sewer spur beneath the railway connecting to Adamstown SDZ, and multiple strategic watermains (approximately 600 700 mm) crossing the area. From this perspective, the SDA benefits from proximity to established trunk infrastructure, and phased servicing delivery coordinated with Uisce Éireann is considered achievable without prejudice to surrounding areas, subject to detailed design and capacity confirmation. The Council acknowledges this as a relevant technical input, albeit one that does not remove the requirement for further cumulative assessment and statutory approval processes. Flooding and Strategic Flood Risk Assessment (SFRA) have been considered in accordance with the Flood Risk Management Guidelines for Planning Authorities (DOECLG, 2009), Circular PL 2/2014, the South Dublin Strategic Flood Risk Assessment (2021) and relevant studies. The Council wishes emphasises that any future development proposals will be subject to site-specific Flood Risk Assessment, prepared by a suitably qualified Chartered Engineer, in accordance with the Guidelines. These assessments will be required to address both fluvial and pluvial flood risk, taking account of climate change projections and the precautionary principle, as set out under Chapter

demonstrate that existing networks can support further growth without compromising service reliability. These concerns are framed explicitly in cumulative terms, with submissions arguing that the combined demands of Adamstown SDZ, Clonburris SDZ and additional variation sites have already stretched utility infrastructure, and that the inclusion of the SDA would add another layer of demand. It is suggested that utilities, unlike some other forms of infrastructure, are less visible but equally critical, and that shortfalls can have farreaching implications for public health, environmental protection, service resilience and climate objectives. In contrast, submissions from landowners and their consultants present a more supportive assessment of utility capacity within the SDA. These submissions are accompanied by technical documentation which sets out existing and planned electricity (high- and medium-voltage), gas and telecommunications infrastructure serving the lands. Reference is made to strategic assets such as undergrounded high-voltage cables associated with the Western Interface Compound, as well as the availability of multiple utility corridors that can facilitate phased servicing of development lands. From this perspective, the SDA benefits from its strategic location adjacent to established infrastructure	12.11 of the CDP. Surface water management is recognised as a key issue for the area. The SFRA states: *' Proposed Future Strategic Long Term Development Area Adamstown South and West comprises agricultural land, hedgerows, some existing dwellings on Tubber Lane and scrub. It is situated directly to the south of Adamstown train station, west of Adamstown and to the north of the grand canal greenway in Adamstown to the south of Lucan. The lands are currently zoned for rural amenity and agriculture. The River Liffey runs approximately 2.5 km north of the site, and a tributary to the river cuts through the eastern section of the site. Sections of the site are located within the site are located in the 1% AEP and 0.1% HEFS extents. Given that the lands are not being currently zoned then under any future plan making process it is recommended that as per GI3 Objective 3 a riparian corridor of at least 10m from each top of bank is provided and water compatible zoning is provided within Flood Zones A and B, and in the HEFS 0.1% and 1% AEP zones. Policies IE3, IE4 and GI3 should be followed during that process to ensure commensurate assessment of flood risk.'* The Council fully supports the position of Inland Fisheries Ireland (IFI), who emphasise that development must comply with the Water Framework Directive and must not result in deterioration of any waterbody within the Liffey catchment, including tributaries such as the Lucan Stream. IFI's requirement that cumulative impacts from phased and multi-site development be assessed and managed collectively, rather than on an application-by-application basis, is fully noted. The CDP provides a robust policy framework to address these matters. Chapter 4 (Green Infrastructure) and Policy GI1 and GI3 require the protection and enhancement of watercourses as key elements of the

networks, and no “insurmountable constraints” to phased utility delivery are identified. Supportive submissions emphasise that, unlike earlier phases of Adamstown SDZ, future development within the SDA is proposed to be masterplan-led and infrastructure-coordinated from the outset, allowing utilities to be planned and delivered in tandem with development rather than retrofitted. They argue that single or consolidated land ownership, combined with early engagement with infrastructure providers, provides greater certainty around delivery and sequencing of utility upgrades. The SDA is therefore framed as an opportunity to address past shortcomings by embedding utility provision as a core structuring element of development, rather than as a residual consideration. Overall, submissions present utilities as a key test of whether further development within the SDA can be progressed sustainably. While many submissions express scepticism based on past delivery experience and cumulative pressure on existing networks, landowner and consultant submissions argue that the SDA’s strategic location, documented infrastructure capacity and phased delivery model can support growth, provided that clear, enforceable commitments to utility delivery are secured and aligned with the timing of development. **Water, Wastewater, Flooding and SFRA**	County’s Green Infrastructure Network, while accommodating flood waters where possible and enhancing biodiversity and amenity through the designation of riparian corridors. Policy NCB9 Objective 4 further requires that development along and adjacent to the Grand Canal protects natural heritage features and includes appropriate setback distances from the pNHA boundary to ensure a fully functioning green infrastructure network. The Council also endorses IFI’s emphasis on Sustainable Drainage Systems (SuDS) as the primary mechanism for surface water management. In accordance with Chapter 12.11.1 of the CDP and the SDCC SuDS Explanatory, Design and Evaluation Guide (2022), all future developments will be required to: • Restrict surface water discharge to greenfield run-off rates; • Maximise the use of nature-based SuDS measures such as swales, basins, ponds, constructed wetlands, permeable paving and green roofs; • Avoid culverting of watercourses except where strictly necessary, such as at road crossings; • Prevent pollution of ground and surface waters during both construction and operational phases. IFI’s advice regarding construction-phase risks, including sediment runoff, pollution incidents and disturbance of riparian habitats, is fully supported. Any future plan will be required to incorporate robust Construction Environmental Management Plans, with controls on earthworks, material storage and works near watercourses, and will be subject to consultation with prescribed bodies as appropriate. Importantly, the Council draws attention to Amendment Ref. No. 17, which introduces a Specific Local Objective (SLO) requiring the

Issues relating to water supply, wastewater capacity, surface water management and flood risk are raised across submissions in the context of the cumulative scale of development within the Adamstown Lucan area, including Adamstown SDZ, Clonburris SDZ, other non-SDA variation sites, and the proposed Adamstown South & West (Outer) Strategic Development Area (SDA). Submissions frequently express concern that wastewater and drainage infrastructure is already under pressure, and that historic experience within Adamstown SDZ demonstrates that infrastructure upgrades have tended to lag behind residential development. In this context, it is argued that the addition of further large-scale development within the SDA would exacerbate existing constraints unless upgrades are not only planned or approved, but fully delivered and operational in advance of occupation. Particular concern is expressed regarding cumulative impacts on pumping stations and downstream treatment capacity, with submissions stating that incremental increases in demand across multiple sites should not be assessed in isolation. Water and wastewater issues are therefore framed as a cumulative and strategic challenge, rather than a site-specific constraint. Submissions contend that, given the scale of ongoing and planned development across Adamstown and Clonburris SDZs, any progression of the SDA requires a high degree of certainty regarding coordinated servicing, including	protection and enhancement of the Green Infrastructure Corridor along the western boundary with County Kildare and the Grand Canal Corridor pNHA, including the provision of ecologically informed buffers. This SLO ensures that water management, flood risk, riparian protection and biodiversity considerations are treated as core structuring constraints, not residual mitigation measures. Future masterplanning for the SDA will be required to demonstrate how hydrological, ecological and fisheries assessments inform development capacity and layout, in line with the SLO and CDP policies. In summary, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. **Riparian Corridor** The issues raised in submissions in relation to riparian corridors have been carefully considered, having regard to the ecological sensitivity of water-adjacent environments within and adjoining Adamstown SDZ West and the Adamstown South & West (Outer) Strategic Development Area (SDA), the detailed observations of Inland Fisheries Ireland (IFI), and the comprehensive policy framework set out in the South Dublin County Development Plan 2022 2028. It is acknowledged that many submissions express concern regarding development in proximity to the Grand Canal corridor and associated tributaries, recognising these as significant natural, ecological and heritage assets performing multiple functions, including biodiversity

clear commitments from Uisce Éireann, defined upgrade programmes and enforceable sequencing mechanisms. At the same time, submissions from landowners and their consultants, including materials submitted by Cairn Homes and Flood Crowley Partnership, present a more supportive assessment of servicing capacity within the SDA. These submissions are accompanied by infrastructure studies which indicate that the lands are serviced and serviceable, with existing foul sewers traversing the site, a sewer spur beneath the railway connecting to Adamstown SDZ, and multiple strategic watermains in the range of 600 mm to 700 mm crossing the lands. From this perspective, the SDA benefits from its proximity to established trunk infrastructure, and phased servicing delivery, coordinated with Uisce Éireann, is considered achievable without prejudicing surrounding areas. The SDA is therefore presented as capable of accommodating development in a structured manner, provided that servicing is planned comprehensively through a masterplan-led approach and delivered in step with development phases. Flooding and flood risk considerations are addressed more narrowly within submissions. Flood Zones A and B are not identified as a specific constraint, and submissions do not challenge the proposed rezonings on the basis of mapped fluvial flood risk. Strategic Flood Risk Assessment (SFRA) does not	support, water quality protection, flood attenuation, recreational amenity and greenway connectivity at a regional scale. The Council notes that Inland Fisheries Ireland (IFI) provide detailed guidance on this matter. IFI emphasise that riparian corridors associated with all watercourses major and minor, open streams and drainage channels are critical ecological assets, performing functions far beyond fisheries habitat alone. These functions include the interception and reduction of pollutants, attenuation of flood flows, stabilisation of riverbanks, regulation of temperature and flow regimes, provision of habitat and refuge for aquatic and terrestrial species, and the maintenance of ecological connectivity at catchment scale. IFI strongly advocate for the retention of undeveloped, vegetated riparian buffers, with development set back sufficiently from watercourse banks to avoid encroachment, disturbance or loss of habitat, and caution against narrow, fragmented or residual buffers that undermine ecosystem integrity. The Council fully supports this position, which is directly reflected in the South Dublin County Development Plan (CDP). The CDP recognises riparian corridors as central components of the County's Green Infrastructure (GI) Network, noting that removal or degradation of riparian vegetation disrupts land water linkages, reduces water quality, simplifies stream channels, destabilises thermal and hydrological regimes, and ultimately leads to a loss of ecosystem services. The Development Plan therefore places strong emphasis on the designation and long-term protection of riparian corridors along major watercourses and their tributaries. In particular, Policy GI3: Sustainable Water Management requires the protection and enhancement of the natural, historical, amenity and

emerge as a dominant issue in objections, with flood risk concerns generally not framed in formal policy or assessment terms. Supporting submissions confirm that no significant flood risk constraints have been identified affecting the lands and propose that site-specific Flood Risk Assessment, together with SuDS-led drainage strategies restricting runoff to greenfield rates, should be standard requirements at planning application stage. Surface water management is referenced largely as part of broader drainage and wastewater considerations rather than as a discrete issue. Submissions do not generally provide detailed commentary on surface water flow paths or attenuation measures, but there is an underlying expectation that surface water will be managed sustainably and integrated into wider green and blue infrastructure systems as development progresses. A specific and important contribution is made by Inland Fisheries Ireland (IFI), whose submission focuses on the protection of surface waters, watercourses and associated aquatic ecology within Adamstown SDZ West and the Outer SDA. IFI emphasise that any future development must comply with the Water Framework Directive, ensuring that there is no deterioration in the status of waterbodies within the Liffey catchment, including local tributaries such as the Lucan Stream. IFI highlight that cumulative impacts arising from phased and	biodiversity value of the County's watercourses and mandates their long-term management as integral elements of the Green Infrastructure Network. This policy is supported by a series of specific objectives, including: • GI3 Objective 1, which requires hydromorphological assessments where development is proposed within lands partially or wholly within identified riparian corridors; • GI3 Objective 2, which requires development proposals to demonstrate how the integrity of riparian corridors will be maintained and enhanced, having regard to flood risk, biodiversity, water quality and ecosystem services; • GI3 Objective 3, which promotes the protection of native riparian vegetation and requires a minimum 10 m vegetated riparian buffer from the top of the riverbank along all watercourses within development sites; and • GI3 Objective 4, which supports the uncovering of existing culverts where appropriate in order to restore watercourses to acceptable ecological standards and strengthen the GI network. Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of riparian corridors, notably CS3 Objectives 1 to 3 and SLO1. Any future development proposals will be preceded by masterplan-led frameworks, informed by detailed ecological, hydromorphological and water management studies, carried out in consultation with relevant prescribed bodies including IFI. This ensures that riparian corridors, buffer widths, connectivity and enhancement opportunities are

multi-site development must be assessed and managed collectively, rather than on an application-by-application basis. They also draw attention to risks associated with construction activity, including sediment runoff, pollution incidents and disturbance of channels, and advise that robust construction environmental management measures must be secured at planning application stage. Importantly, IFI do not object in principle to the designation of the lands as a Future Strategic Long-Term Development Area, but state clearly that any future rezoning or development proposals must be supported by site-specific hydrological, ecological and fisheries assessments, and must demonstrate how watercourses will be protected, enhanced where possible, and integrated into the green infrastructure network. Furthermore, the IFI, highlights that surface water management is a key issue for the area. IFI state that all new development should incorporate Sustainable Drainage Systems (SuDS) designed to mimic natural drainage processes, limit run-off rates to greenfield conditions, and ensure that no untreated or inadequately treated surface water enters watercourses. They caution against reliance on hard-engineered drainage solutions that could increase sediment loading or alter flow regimes. Overall, submissions on water, wastewater and flood risk consistently emphasise the need for a	assessed at a cumulative and strategic scale, consistent with IFI's advice and CDP policy, rather than on a site-by-site or piecemeal basis. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Heritage** The Planning Authority acknowledges the heritage concerns raised, including impacts on Protected Structures such as Finnstown Castle and the setting of assets like Aderrig Church, as well as the wider Liffey Valley cultural landscape and High Amenity areas. It is emphasised that heritage is a key consideration under the National Planning Framework and the South Dublin County Development Plan, which require the protection, conservation and appropriate integration of built and cultural heritage. The designation of the SDA does not permit immediate development; rather, any future proposals will be subject to detailed heritage assessment, including architectural, archaeological and landscape appraisals, and full compliance with Development Plan objectives. Through a masterplan-led and plan-based approach, appropriate buffers, sensitive design and protection of setting will be required to ensure that heritage assets are safeguarded and incorporated into development proposals. Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future

precautionary, infrastructure led and cumulative approach to the development of the SDA. While objectors raise concerns based on historic delivery experience and current capacity pressures, landowner and consultant material indicates that, from a technical perspective, the lands can be serviced and managed sustainably, provided that development is phased, coordinated with infrastructure providers, and supported by robust flood risk and surface water management measures. **Riparian Corridor** Riparian corridor considerations arise across submissions primarily through broader environmental and green infrastructure concerns, rather than through detailed engagement with formal river setback standards or buffer dimensions. While many submissions do not expressly reference prescribed riparian corridor widths or specific river corridor encroachment policies in relation to the subject lands, a clear concern is articulated regarding development in proximity to sensitive water adjacent environments, most notably the Grand Canal corridor and associated watercourses within and adjoining Adamstown SDZ West and the South & West (Outer) SDA. A number of submissions object to development near the Grand Canal, describing it as a significant ecological, landscape and heritage asset that performs multiple functions, including biodiversity	consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. **Aviation Safeguarding** A submission made on behalf of Weston Airport has been carefully considered, with particular regard to the safeguarding of aviation operations, public safety, and the operational and technical requirements of civil aerodromes within and adjoining South Dublin County. The Council supports aviation safeguarding as set out within Chapter 11.8 of the South Dublin County Development Plan 2022–2028, which provides a comprehensive framework for development controls in the vicinity of Dublin Airport, Casement Aerodrome and Weston Airport, having regard to international, European and national aviation standards. These include the safeguarding requirements established under ICAO Annex 14, the Irish Aviation Authority (IAA) Guidance on Aerodrome Safeguarding, and the EASA Certification Specifications for Aerodromes. The Council recognises the role of Weston Airport as a key aviation facility, including its use for pilot training and Irish Coast Guard Search and Rescue operations, and notes ongoing developments such as RNAV approach procedures. The Council reaffirms its commitment to Policy IE10 and associated Development Plan objectives, which ensure that development in the vicinity of the airport is appropriately managed. In addition, the continued application of Public Safety Zones (PSZs) under Policy IE14 is emphasised, restricting development in areas close to runway thresholds in the interests of public safety. Overall, the Council is satisfied that the existing Development Plan framework provides adequate safeguards to protect airport operations and

support, water quality protection, recreational amenity and greenway connectivity. It is argued that development encroaching toward this corridor would erode its character, diminish natural buffers, and undermine its role as a continuous greenway and wildlife corridor linking the wider Liffey catchment with surrounding amenity and agricultural lands. These submissions express concern that cumulative development pressures from Adamstown SDZ, Clonburris SDZ and proposed SDA lands risk incrementally narrowing and fragmenting canal side and watercourse related green corridors if not explicitly safeguarded. A more focused and technical position is set out by Inland Fisheries Ireland (IFI). IFI emphasise the importance of maintaining and protecting riparian corridors associated with all watercourses within and adjoining the lands, including minor streams and drainage channels connected to the Liffey catchment. IFI state that such corridors perform critical functions beyond fisheries habitat alone, contributing to water quality protection, flood attenuation, biodiversity, and ecosystem resilience. They identify the retention of undeveloped riparian buffers as an essential requirement, with development set back sufficiently from watercourse banks to avoid encroachment, disturbance or loss of habitat. IFI further recommend that riparian corridors be treated as integral components of a wider green	residential amenity, and supports the continued safeguarding of Weston Airport's function. **General Landowner Responses and RZLT:** The general nature of the landowner submissions are noted throughout the CE Responses. As per the TPA submission, the Residential Zoned Land Tax is a separate piece of legislation and shall be applied as appropriate to lands which are deemed to meet the requirements of that legislation. The SDA designation is not a land use zoning. **Environmental Evaluation** The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Tubber Lane North. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority.

infrastructure network and assessed at a cumulative scale, rather than on a site by site basis. Taken together, submissions indicate that while riparian corridor requirements are not always articulated in technical or policy language by members of the public, there is a consistent expectation that water adjacent environments particularly the Grand Canal and associated tributaries are afforded a high level of protection. IFI's submission provides clear clarity on this issue, highlighting the need for explicit riparian safeguards as development pressures increase across the SDA and surrounding SDZs. Overall, the riparian corridor issue is framed as one that requires a precautionary, strategic and cumulative approach, ensuring that remaining buffers are protected, enhanced where possible, and integrated into the long term green infrastructure framework of the Adamstown area as development proceeds. **Heritage** Heritage considerations are raised across submissions primarily in relation to localised heritage assets and landscapes within and adjoining the Adamstown South & West (Outer) Strategic Development Area (SDA), rather than as an abstract or purely cumulative policy concern. Submissions focus on the potential impacts of further development on identified heritage features and their immediate settings, particularly where these	It is important to note that there are a number of related projects, such as, BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process.' Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The

form part of the established character and identity of the Lucan area. A recurring theme concerns the longstanding High Amenity designation of St. Edmundsbury and its role within the broader Liffey Valley cultural landscape. Submissions argue that these lands represent an important historic and visual setting, providing continuity with the valley's landscape heritage and contributing to Lucan's distinct sense of place. It is contended that rezoning and subsequent development within the SDA would undermine the historic value and integrity of this landscape, eroding views, spatial relationships and the historic separation between built-up areas and the valley corridor. More specific and strongly articulated objections are raised in relation to individual heritage assets, most notably Finnstown Castle, which is identified as a Protected Structure, along with its associated historic demesne. Submissions argue that residential development within proximity to Finnstown Castle would result in irreversible harm to its setting, curtilage and the legibility of the historic estate landscape. Similar concerns are raised in relation to Aderrig Church and graveyard, where submissions cite the archaeological and historic significance of the site and request the application of appropriate buffer zones to prevent encroachment and protect the setting of the structure and associated burial	additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. In addition, a future plan making process and zoning will also be subject to AA and SEA. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. It is important to note that the designation of the Strategic Development Area (SDA) does not permit immediate development; rather, it will establish a pathway to a future plan-led land use change supported by comprehensive studies and evidence. This approach is intended to ensure that critical infrastructure planning, environmental assessment and stakeholder engagement are advanced in parallel with any future consideration of rezoning, thereby reducing delivery risk and avoiding a reliance on retrospective infrastructure provision. Future public consultation and stakeholder engagement will be carried out prior to any rezoning decisions and plan making.

grounds. These submissions maintain that development pressure arising from the SDA could compromise both the physical fabric and the wider contextual appreciation of these assets, contrary to Development Plan policies and National Planning Framework objectives relating to heritage protection. In addition to built heritage, submissions refer to the intangible heritage value of the area, including historic land use patterns and long-established landscape character, which are described as vulnerable to incremental erosion through large-scale development. While some submissions frame these concerns within a wider narrative of overdevelopment in Lucan, the emphasis remains on site-specific and localised impacts, rather than a generalised loss of heritage resources across the county. In contrast, submissions from landowners and their consultants present a more qualified interpretation of heritage constraints within the SDA. These submissions reference heritage appraisals and baseline assessments carried out to date, which indicate that no known heritage constraints have been identified that would, in principle, preclude development of the lands. It is argued that the absence of recorded monuments or insurmountable heritage designations across large portions of the SDA allows for development to be considered, provided that a careful, evidence-based approach is	

adopted. Landowner and consultant submissions commit to ongoing heritage assessment at masterplanning and planning application stages, with a stated intention to ensure that any identified heritage features are appropriately protected, buffered and, where possible, sensitively integrated into development proposals. Overall, submissions on heritage highlight the need for a balanced and site-specific approach to heritage protection within the SDA. While many submissions object to the proposed zoning on the basis of potential harm to recognised heritage assets and valued historic landscapes, landowner and consultant submissions maintain that development can be accommodated without unacceptable heritage impacts if informed by detailed assessment, appropriate buffers, and sensitive design. The issue is therefore framed around the protection of localised heritage assets and settings, rather than cumulative heritage loss per se, with an emphasis on ensuring that heritage considerations remain central to any future masterplanning or phased development of the SDA. **Aviation Safeguarding** A submission was received from TPA consultants on behalf of Weston Airport. Support was indicated for the overall intent of Proposed Variation No. 2, and South Dublin's approach to aligning the Development Plan with the National Planning Framework (NPF)	

Housing Growth Requirements (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). The primary purpose of the submission is to safeguard the current and future operational, safety and technical requirements of Weston Airport, in accordance with Section 11.8.3 of the South Dublin County Development Plan 2022–2028. The submission notes that a number of land parcels proposed for rezoning and requests that any future planning applications on these lands be carefully assessed to ensure there are no adverse impacts on the operational integrity of Weston Airport, aviation safety requirements, and associated specialist aviation activities, including the Irish Coast Guard Search and Rescue helicopter operations based at the airport. It is highlighted that Weston Airport, in consultation with the Irish Aviation Authority (IAA), is currently implementing RNAV (Area Navigation) approach procedures for Runway 07/25. These procedures will be used by the Coast Guard Search and Rescue service and are identified as particularly sensitive to inappropriate development that could interfere with flight paths, safety surfaces, or navigational requirements. Overall, while supporting the strategic aim of increased housing delivery, the submission	

emphasises the importance of ensuring that future development near Weston Airport is managed in a manner that avoids conflict with aviation operations, through careful planning assessment and adherence to existing airport-related policy provisions in the Development Plan. **General Landowner Responses and RZLT** Taken together, the Flood / Crowley Partnership and Cairn Homes submissions with their relevant supporting documents advance a coherent, strongly supportive case for Amendment Ref. No. 17 and for the early activation of Adamstown Station TOD Precinct, framed within a masterplan-led, infrastructure-first, environmentally responsive approach. The material consistently positions Adamstown South & West (Outer) as one of the County's most credible and deliverable long-term growth locations, with clear guidance on sequencing, future zoning priorities and integration with strategic infrastructure. Further to this, TPA on behalf of McCreevey are also broadly supportive of the proposed SDA zoning, subject to a number of clarification or considerations regarding DART+ and RZLT, the latter dealt with below: <u>Residential Zoned Land Tax</u> The condition could unfairly expose landowners to Residential Zoned Land Tax, as lands may be	

deemed serviceable despite occupation being legally prohibited. The submission therefore seeks removal of the condition as a non-material alteration, noting that restricting housing delivery is not an appropriate response to infrastructure delays. Instead, it concludes that housing and transport infrastructure should progress in parallel to ensure timely delivery and policy compliance. **Environmental Evaluation** Environmental assessment considerations arise in a limited but consistent manner across submissions, primarily in relation to the broader strategic processes of Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) as they apply to plan-making and future rezoning within the Lucan Adamstown area. In respect of Strategic Environmental Assessment (SEA), a small number of submissions make general reference to the need to consider the cumulative environmental effects of multiple rezonings and large-scale development across Lucan and Adamstown, including ongoing and proposed SDZs and other variation sites. These submissions express concern that the aggregate impact of development on environmental quality, green infrastructure and service capacity should be fully understood at plan level. However, submissions do not raise specific objections to the SEA process itself, nor do they allege deficiencies in the methodology or compliance	

of the SEA undertaken in support of the Development Plan or proposed variations. Rather, SEA is referenced as an important safeguard to ensure that cumulative impacts are appropriately assessed and managed at a strategic scale. In relation to Appropriate Assessment (AA), submissions do not explicitly reference European Sites, Natura 2000 designations or specific potential impacts on qualifying interests. While biodiversity and environmental quality issues are raised more broadly in other contexts, there are no direct allegations that the proposals would give rise to significant effects on designated sites requiring AA beyond the normal plan-level screening and assessment processes. As such, AA does not emerge as a substantive area of contention within public submissions. Submissions from Cairn Homes and other landowners/consultants address environmental assessment matters by way of qualification and clarification. These submissions explicitly acknowledge that full SEA will continue to be undertaken through the statutory Development Plan and any future rezoning or variation processes, in accordance with legislative requirements. They indicate that preparatory technical and environmental studies carried out to date do not identify any significant environmental impediments to development, subject to appropriate mitigation	

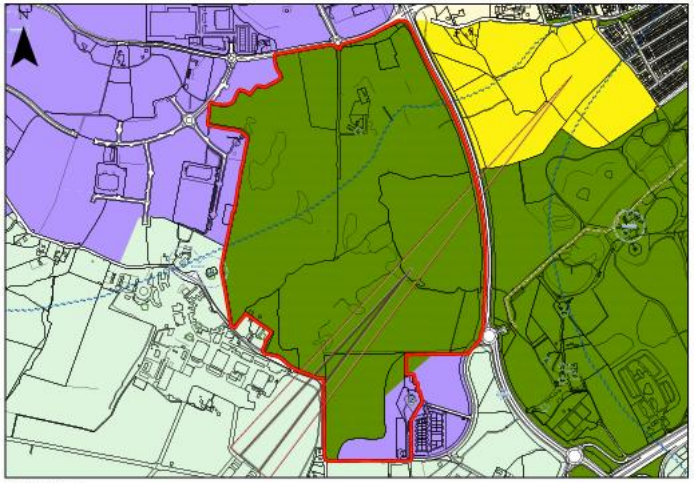
and monitoring. In respect of AA, supportive submissions recognise the need for proportionate AA screening at future stages, but state that there are no known proximity impacts on Natura 2000 sites, and that environmental readiness is supported by baseline ecological studies and a mitigation-by-design approach embedded within masterplanning and development frameworks. Overall, submissions demonstrate general acceptance of the SEA and AA frameworks as the appropriate mechanisms for assessing environmental effects at plan and project level. While some submissions emphasise the importance of addressing cumulative impacts through SEA, particularly in an area experiencing significant growth, there is no evidence of substantive dispute regarding the adequacy or application of SEA or AA processes themselves.	

CE Recommendation

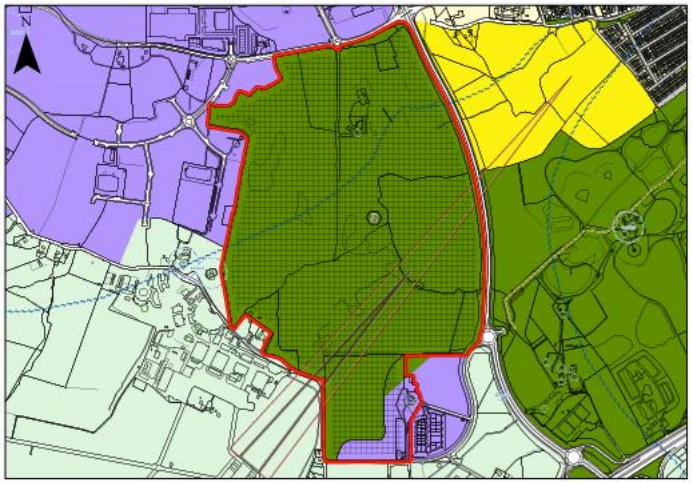
To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows:

CS3 Objective 4
To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.

AMENDMENT NO. 18 - GRANGE CASTLE



Existing



Proposed

Submission No.

SD-C401-CDP25-348 – Paul Bohan

SD-C401-CDP25-414 – niall oneill

SD-C401-CDP25-429 – Stuart Campbell

SD-C401-CDP25-809 – Cllr Trevor Gilligan PC

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-969 – Dermot McGreal

SD-C401-CDP25-1159 – David Whittle

SD-C401-CDP25-1242 – Karen Devenney Devenney

SD-C401-CDP25-1260 – David Kinsella

SD-C401-CDP25-1270 – Marcel Notenboom

SD-C401-CDP25-1271 – Karen Kinsella

SD-C401-CDP25-1362 – Katie Moore

SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1375 – Office of the Planning Regulator	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1513 – National Transport Authority
SD-C401-CDP25-1523 – Kevin Farrell	SD-C401-CDP25-1532 – John Gobbett	SD-C401-CDP25-1535 – Elaine Chapman
SD-C401-CDP25-1542 – Sean Ward	SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1584 – Luke Heffernan
SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1709 – Daniel McCartney	

Summary	CE Response
Submissions were received from individual residents, elected representatives, and prescribed bodies in relation to the lands at Grange Castle being rezoned as Future Strategic Long-Term Development Area. The submissions generally opposed the rezoning of the lands due to lack of infrastructure, such as roads, public transportation, community services, and schools. **Zoning and Overdevelopment** The submissions collectively object to the proposed rezoning on the basis that the area is already overdeveloped, with existing infrastructure and public services under significant strain. Concerns are	**Amendment no. 18 – SDA Designation of Grange Castle** Amendment no. 18 identifies lands zoned 'OS' and 'EE' within Grange Castle as a proposed Future Strategic Long-Term Development Area (SDA). Amendment no. 18 is proposed in conjunction with new Policy and Objectives under Policy CS3 in the amendments to the Written Statement, Chapter 2 relating to Future SDA lands as proposed under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028. **Variation Context and Process** Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings.

also raised that recent and ongoing large-scale developments, including Clonburris, are already having noticeable negative impacts despite not being fully completed. It is largely asserted that further residential development would intensify pressure on transport, amenities, and services that are already inadequate to meet current demand. One submission highlights that the proposed development would function as a standalone residential area with no defined centre, amenities, or sense of place. Without firm commitments to deliver services and facilities, it is argued that the development would contribute to congestion, lack community cohesion, and represent poor planning practice. Another submission objects referring to the Planning and Development Act 2024 on the grounds that it is not proper planning and sustainable development; evidence-based; does not align with public infrastructure; and that zoning and phasing do not reflect credible infrastructure delivery programmes. Overall, the submissions consider the rezoning unsustainable in its current form due to the cumulative impacts of overdevelopment and the absence of guaranteed supporting infrastructure. Results of an online public poll carried out by a local councillor were submitted in respect of a range of	This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation also considered the need for longer term lands to facilitate delivery of housing targets up to 2040. These identified the amendments to include objectives for Future Strategic Long Term Development Areas (SDAs) at Adamstown South and West, Newlands, Belgard and Grange Castle with a focus on Transport Oriented Development (TOD). The zoning of these lands will be a matter for the next County Development Plan. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet: → The housing shortfall to meet the baseline targets for 2028 → Built-in additional capacity to meet the 2028 targets → The long-term housing needs of the county to 2040 and beyond **Strategic Development Areas (SDAs) and the Subject Site** The Chief Executive notes that current housing delivery within the County is significantly reliant on the planned capacity and phased delivery of existing Strategic Development Areas such as Clonburris and Adamstown, which continue to provide the primary locations for large-scale, serviced residential growth. While these areas remain critical to meeting short- to medium-term supply, there is a clear requirement to identify and advance additional Strategic Development Areas to ensure continuity of delivery and to avoid future supply constraints.

sites proposed to be rezoned as part of Variation No. 2. The results shown in the submission for the proposed rezoning at Grange Castle indicated 0 in favour, 14 against. **Traffic and Roads** The submissions express concern about severe and worsening traffic conditions in Lucan and the Grange Castle area, arguing that the area cannot sustain any further development. Residents report significant daily delays when accessing main roads, particularly along the Ballyowen and Grange Castle Road network, with congestion already causing lengthy and unpredictable journey times. Recent road layout changes are cited as contributing to delays, while substantial nearby developments at Clonburris, Seven Mills and Hayden's Lane are expected to intensify traffic pressures. Due to the unreliability of public transport in the more suburban areas, residents are left with little alternative to private car use, causing congestion. Overall, the view is that existing road and transport infrastructure is already overstretched, existing communities are negatively affected, and further rezoning would significantly exacerbate traffic congestion and reduce quality of life unless proper infrastructure is delivered first. It is instead suggested that density be increased closer to the city centre where people work and socialise.	In this regard, a proactive, plan-led approach is required to bring forward new sustainable growth locations, aligned with infrastructure provision, transport capacity and national planning policy, thereby ensuring that housing delivery can be maintained at the necessary scale beyond the build-out of the existing SDAs. This approach is intended to ensure that critical infrastructure planning, environmental assessment and stakeholder engagement are advanced in parallel with any future consideration of rezoning, thereby reducing delivery risk and avoiding a reliance on retrospective infrastructure provision. The SDA designation at Grange Castle is planning for future land use change and growth. It is emphasised that the subject lands, identified as Future SDA, are subject to future rezoning and do not provide for development at this moment in time. Their purpose in being identified as part of this Variation is to respond to the NPF Implementation Guidelines which requests that planning authorities consider the long-term housing needs of the County and to give clear strategic direction to future development locations to enable the lead-in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for the release of such lands as the need arises in the 2030s. Policy CS3: Future Long-Term Development Areas, and its associated objectives, require that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. It should be noted that there is a Specific Local Objective on this proposed Future SDA which is: *CS3 SLO 2:*

Public Transport There is an objection to the proposed rezoning on the grounds that existing transport infrastructure is already severely inadequate. Public transport provision is described as unreliable and insufficient: - Bus services are frequently cancelled, failing to arrive, or operating at full capacity early in their routes. - Rail services are described as being infrequent and limited. As a result, residents report that they are unable to depend on public transport for commuting for daily activities, increasing reliance on private cars and exacerbating traffic and roads congestion. It is asserted that adequate transport infrastructure must be delivered for existing residents and committed developments before any further rezoning is considered. The Metro SouthWest Group (MSWG) submits that of the four SDAs proposed in the Variation No. 2, it is not clear what public transport will serve Grange Castle/R136 SDA. Irish Rail notes the permission for the DART+ South West extension, which will increase capacity and frequency at Kishoge station. The National Tranport Authority (NTA) notes the identification of future strategic long-term	*To carry out a study of the lands at Grange Castle / R136 to identify their future reallocation for alternative uses while retaining a golf course function within the lands and considering flood risk assessment, existing green infrastructure and riparian corridors.* It is noted that an independently conducted online poll was recorded by way of a submission indicating the number of respondents who were for and against the designation, there being 14 No and 0 Yes. However, it is not known if any of the respondents made submissions through the variation process. As such, the CE cannot respond further on the results or the reasons for them. **Zoning and Overdevelopment** It is necessary to distinguish between immediate residential zoning and the identification of lands for long-term strategic growth. This amendment does not propose a rezoning of lands for residential development. The designation of the SDA does not equate to immediate development or zoning. Instead, it provides a structured, plan-led mechanism to guide future growth beyond the lifetime of the current Development Plan. The current zoning is retained under this proposal, that is as 'OS' to preserve and provide for open space and recreational amenities, and as 'EE' to provide for enterprise and employment related uses. Any future rezoning of these lands would be subject to a separate process, likely the next 10 year Development Plan and beyond. As such, while the lands are proposed as Future SDAs under the Variation, they will require a future rezoning decision with associated public consultation.

development areas at Adamstown South and West (Outer), Belgard, Newlands, Grange Castle, and the objectives which apply to their progress. The NTA is satisfied that in the long-term development at these locations could potentially align with the principles of transport and land-use integration as long as their development is subject to a statutory land use plan which provides for the phasing of growth in line with the provision of transport infrastructure and services. It is the view of the NTA that the most appropriate mechanism to achieve the above is through undertaking Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII), as part of the preparation of statutory land use plans. The need for an ABTA for these sites should be included within the objectives under Policy CS3. **Community and Social Infrastructure** Concerns have been raised about the proposed rezoning due to existing pressures on community and social infrastructure—GPs, schools, childcare facilities, shops within walking distance—and it is requested that councillors vote against this housing rezoning amendment as existing services are already over-subscribed in the area. **Schools** It is also noted that schools in Clondalkin and the Grange Castle area are at capacity, and new schools	The overall population growth target referred to in the NPO 3 for the Eastern and Midlands region is 50% of new housing within Dublin City and suburban footprints and 30% of all new housing, elsewhere within existing urban footprints. The former applies to Grange Castle. **Traffic and Roads** The designation of Adamstown South and West (Outer) Strategic Development Area as a Future Strategic Long-Term Development Areas reflects a plan-led, long-term approach. Any future phasing framework in a plan for this SDA at Grange Castle will be required to align development progression with the delivery and operation of transport infrastructure and network capacity. Active travel will be a core component of any future planning framework for the SDA, integrating with and expand the existing walking and cycling network, including connections to the Grand Canal Greenway and Grange Castle employment area, supported by Cycle South Dublin and national active travel policies. Design standards such as DMURS and the National Cycle Manual will ensure safe, legible and high-quality environments, prioritising pedestrians and cyclists. While submissions highlight current deficiencies and safety concerns, the SDA provides an opportunity to address these through a plan-led, infrastructure phased approach, ensuring coordinated delivery of future transport infrastructure, services and active travel infrastructure. Concerns related to traffic and roads infrastructure are noted, particularly concerns regarding congestion from nearby developments, such as Clonburris. Concerns specific to congestion on Ballyowen and Grange Castle Road are also noted.

should be completed before new residential units are built. **Parks and Open Space** The submissions highlight the importance of retaining remaining parkland and open space to serve community needs in an already heavily developed area. It is stated that the Grange Castle pitch and putt course is a community amenity that supports both physical and mental wellbeing. The submissions recognise the lands for their significant recreational and open-space function, providing accessible outdoor facilities for residents. It is recommended that the area be retained as Open Space, with potential for additional sports and recreational facilities to be developed and managed by the local authority for the benefit of the community. It is asserted that any future reallocation or change in use should carefully consider the impact on public amenity, access to open space, and the loss of existing recreational provision. **Biodiversity and Green Infrastructure** The submissions state that the lands form an important component of the wider green infrastructure network within the Liffey Valley and surrounding area and play a key role in supporting biodiversity and ecological connectivity. It is stated that any change in land use should only occur following a robust assessment of these	The benefit that an Area-Based Transport Assessments (ABTA) could bring to the plan making process for a SDA is noted and considered appropriate to include by way of a further objective under Policy CS3. Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Any future assessment will consider the capacity of the existing road network, identify required mitigation measures, and assess impacts on adjoining land uses, including the Grange Castle pitch and putt. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 Objective 3, and do not preclude the identification of the subject lands as a Future SDA. ***Public Transport*** The Council welcomes the NTAs view that the Future Strategic Long-Term Development Areas could potentially align with the principles of transport and land-use integration subject to a statutory land use plan providing for growth in line with the provision of transport infrastructure and services. The intention of the Future SDA designation is to allow for the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders including the NTA and TII to plan for the release of lands as need arises in the 2030s to inform rezoning proposals. The observations on Grange Castle and the interface with the existing transport infrastructure, including from the Metro SouthWest Group, is noted and will be a key consideration as part of the plan-led approach

environmental constraints and the long-term landscape character of the area. It is noted that it is important that the study referenced in CS3 SLO2 is carried out in a thorough and transparent manner before any future changes to zoning or land use are considered. The Department of Housing, Local Government and Heritage (NPWS) submit that the lands at Grange Castle have significant biodiversity value. **Surface Water** It is stated that the Grange Castle lands contain significant flood-risk areas, with risks intensifying due to climate change, and that flood risk may be further worsened by nearby industrial development on Nangor Road. It is also noted that the lands play an important role in the riparian corridor of the River Liffey. Protection of this corridor is essential to maintaining the river, landscape character, and ecological integrity. Any reallocation of land-use must safeguard riparian functions. Additionally, it is noted that the objective explicitly requires that any future land-use change must be informed by a detailed assessment of flood risk assessment.	to these lands set out in Policy CS3. An objective within that policy clearly sets out the intent for a statutory process and the need for sustainable transport options as follows: *CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* Irish Rail confirms the delivery of Kishoge Rail Station as part of the DART+ South West extension that has been approved for delivery. This station is located about 2km north of the site via R136, which will increase the connectivity of the site to Dublin City Centre. It is the view of SDCC that the Grange Castle site is a multimodal and multidirectional site, as there are bus routes East to West and North and South to access the Red Cow, City Centre, and Kishoge train station. This transport infrastructure may be expanded during the master planning process and thus aligns with the TOD required for Future SDA sites. ***Community and Social Infrastructure*** Concerns relating to the lack of GPs in the area are noted. A plan making process will need to be done to ensure the social infrastructure in the area would meet the need of such development. On this, it

Utilities Uisce Éireann notes that this is a substantial site and will need early engagement on a masterplan. The Electricity Supply Board (ESB) notes several network reinforcement initiatives are currently underway or being evaluated throughout South Dublin to address substation capacity constraints and maintain security of supply. The programme includes a series of new 110kV substations, including one at Grange Castle West Junction. **Heritage** A submission from the South Dublin Conversation Society notes the setting of Kilcarberry House and its curtilage is a Record of Protected Structure No. 173 and must be protected from inappropriate development. **Casement Aerodrome** A submission notes the proximity to the touchdown point of the runways of Casement Aerodrome, Baldonnell, the primary military airbase of the Irish Air Corps. It is also stated that the aerodrome is undergoing a €120 million expansion to accommodate the growing fleet and the area around the airport is a restricted, controlled zone. It is stated that to contemplate building homes here beggars belief.	should be noted there is a new HSE primary care facility that has been delivered in Clondalkin. The South Dublin County Development Plan 2022 2028 provides a comprehensive policy framework to ensure that community and social infrastructure is planned and delivered in a coordinated manner. Chapter 8 (Community Infrastructure and Open Space) and Chapter 12 (Implementation and Monitoring) set out standards and requirements for community centres, healthcare facilities, childcare, public open space and recreational amenities. Policy COS2 commits the Council to working closely with the Health Service Executive, Department of Education and other relevant agencies to meet the necessary provision of community infrastructure in line with population growth, while Policies H7 and related objectives emphasise high-quality residential environments supported by appropriate amenities. The future planning of the SDA will be required to comply with the CDP approach. The Core Strategy 3 Specific Local Objective 2 (CS3 SLO 2) states *"To carry out a study of the lands at Grange Castle / R136 to identify their future reallocation for alternative uses while retaining a golf course function within the lands and considering flood risk assessment, existing green infrastructure and riparian corridors."* Thus, a golf course use on the lands will be retained and integrated into future land use planning. ***Schools*** It is noted that the Department of Education and Youth, in their submission in respect to Variation No. 2 state the following *The department notes that as per Table 11 Core Strategy there is a projected 516 potential units in this settlement. This is 118 units above*

A submission indicates that careful consideration to Grange Castle should be given because of its proximity to Casement Aerodrome, which although it has limited capacity is the only airfield in the immediate vicinity of Dublin Airport should it be required in case of emergency.	*the current CDP figures. These projected figures could see an increase in primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required. In the context of post primary provision, the projected growth figures could see a significant increase in post primary school place demand, which potentially could be accommodated within existing post primary schools and current capital projects.* A plan will have to be done prior to the development of the site and that will require engagement with the Department of Education prior to the residential delivery of the site. **Environment, Biodiversity and Green Infrastructure** The concerns regarding biodiversity and green infrastructure are noted, including the submission from the NPWS within the Department of Housing, Local Government and Heritage. The policy and objectives relating to SDAs in the Written Statement includes CS3 Objective 1 which states: *"To commence preparatory studies and analysis of the Future SDAs, as identified on the development plan maps, to understand the existing land uses and ecological sensitivities and to inform the preparation of future proposals for rezoning to meet the needs of the County through an holistic approach to plan making. The exact lands to be brought forward as future rezoning may change according to the outcome of these studies."* And CS3 Objective 3 which states:

	To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with policy under CS3, and do not preclude the identification of the subject lands as a Future SDA. ***Parks and Open Space*** It is asserted in the submissions received that subject lands should remain as open space to serve community needs in this heavily developed area. The policy and objectives relating to SDAs in the Written Statement as outlined above include CS3 Objective 1 and 3 and also include CS3 SLO2 which states: *"To carry out a study of the lands at Grange Castle / R136 to identify their future reallocation for alternative uses while retaining a golf course function within the lands and considering flood risk assessment, existing green infrastructure and riparian corridors."* The purpose of CS3 SLO 2 is to safeguard the future use of part of the site whilst providing for more detailed assessment to explore

	alternative land uses, whilst also considering flood risk assessment, existing green infrastructure and riparian corridors. Any future rezoning and development of these will be subject to the provisions of the County Development Plan in place at that time, including open space standards and requirements, together with policies and provisions relating to green infrastructure and riparian corridors. **Comprehensive Study** A submission requests that the lands be evaluated by a comprehensive and transparent study. It is noted and agreed that the strategic long-term lands are to be subject to detailed studies to inform any potential rezoning proposals in the future. As indicated above, this is included in the policy and objectives for Future SDAs within CS3 of the Written Statement. ***Surface Water*** While concerns raised regarding surface water management and potential knock effects are acknowledged, the Planning Authority is satisfied that the County Development Plan contains robust policy and objectives, together with Strategic Flood Risk Assessment (SFRA) and SDCCs SuDs Guidance, to ensure that surface water matters are appropriately addressed. It is emphasised that the identification of the lands as a Future SDA does not give rise to any immediate development. Rather, it establishes a framework in which future development, will be subject to a comprehensive plan-led approach under Policy CS3. Development cannot proceed without clear demonstration that surface water and flood risk issues have been fully assessed and mitigated in a

	manner that protects existing and future users, safeguards amenity and mitigates residual adverse impacts. Issues pertaining to construction activity and management of same, as set out in the CDP, are addressed through the development management and enforcement processes rather than through proposed designations as SDAs to the CDP. ***Strategic Flood Risk Assessment*** Proposed Future Strategic Long-Term Development Area lands at Grange Castle comprises of a golf course, open grassland and treelines. It is situated directly to the west of Grange Castle Road in Priest-Town to the west of Clondalkin. The lands are currently zoned for open space and recreation (green), and enterprise and employment (purple). One stream runs along a small section of the northwestern corner of the site. The site is situated within Flood Zones A and B, and in the 1% and 0.1% AEP HEFS extents. There is comprehensive policy within the County Development Plan on managing flood risk, which reflects section 28 Guidelines for same. As part of studies for the lands full consideration will be given to flooding and to how areas that flood can be incorporated into a nature based solutions approach to any rezoning. **Water and Wastewater**

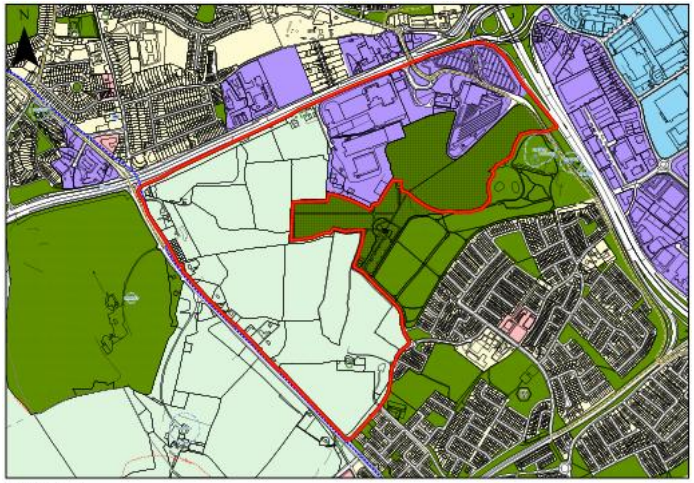
	The CDP recognises the importance of aligning development with the provision of adequate water services infrastructure and supports the ongoing delivery of upgrades to accommodate projected growth. It is emphasised that the identification of the lands as a Future SDA does not result in any immediate demand on water or wastewater infrastructure. Rather, it provides a framework within which infrastructure requirements can be identified, assessed and delivered in a coordinated manner. Policy CS3 requires that any future development proposals are subject to detailed infrastructure assessment and are contingent on the availability of sufficient capacity, including engagement with UÉ to ensure alignment with infrastructure delivery. UÉ have indicated the following in relation to Amendment No. 18: *'Long Term Strategic Water:* This is a substantial site and will need early engagement on a masterplan. (9B Sewer Upgrade) The proposed Variation identifies areas as Future SDAs to enable the commencement of preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of strategic reserve lands as the need arises in the 2030s. This allows for early engagement with Uisce Éireann to ensure that the necessary infrastructure can be delivered to meet demands. **Utilities** SDCC notes the submission received from ESB and the planned 110kV substation at Grange Castle West Junction.

	SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals. In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place. **Heritage** Kilcarbery House, Off New Nangor Road, Kilcarbery RPS Ref: 173 being present on site means that any future rezoning and development proposals will be required to be consistent with current and future County Development Plan objectives and national guidelines to ensure the protection of built heritage. The County Development Plan provides strong policies and objectives regarding the protection of the built, natural and archaeological heritage of the County, in particular Policy NCHB1, NCBH13, and NCBH19. Furthermore, Policy CS3: Future Long-Term Development Areas and its associated objectives (CS3 Objective 1, outlined above), requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach.

	Any future development proposal(s) on the subject lands, will have regard to the aforementioned CDP policy and objectives as part of the plan-led process, whereby relevant CDP policies will be required to be conformed with. **Casement Aerodrome, Baldonnel** There are Policies and Objectives set out in Section 11.8 of the adopted County Development Plan 2022-2028 regarding Airports and Aerodromes and specific provisions in Section 11.8.2 relating to Casement Aerodrome. It is noted that part of the Grange Castle lands identified as a Future SDA have the following aviation related restrictions identified under the adopted County Development Plan 2022-2028: • Approach Surfaces (Casement) • Public Safety Zones (Casement) • Take Off Climb Surfaces (Casement) • Inner Horizontal Surface (Casement) • Noise Significant Boundaries (Casement) • Bird Hazards • Casement Security Zone Any future rezoning and development of these lands will be guided by the current and future County Development Plan provisions and engagement with the Irish Air Corps / Department of Defence. **Conclusion** Having regard to the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) request that

	planning authorities consider the long-term housing needs of the County for the remaining period of the current adopted plan and the lifespan of the new 10-year development plan; to the need to give clear strategic direction to future development locations under the next 10-year County Development Plan to enable the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of such lands as the need arises in the 2030s; and to the location of the proposed SDA within the Dublin City and Suburbs settlement area, it is considered that the identification of lands at Grange Castle as a Future SDA is appropriate, subject to further detailed analysis of the lands as set out Policy CS3 associated with the Variation. It is important to note that the designation of the Strategic Development Area (SDA) does not permit immediate development; rather, it will establish a pathway to a future plan-led land use change supported by comprehensive studies and evidence. Future public and stakeholder consultation will be carried out in any plan making process and in consideration of any future rezoning.
CE Recommendation To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows: **CS3 Objective 4** **To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.**	

AMENDMENT NO. 19 - NEWLANDS



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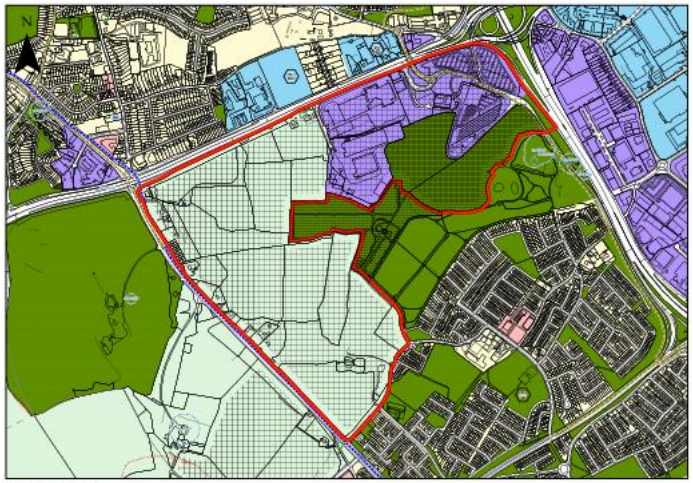


Proposed

Submission No.

SD-C401-CDP25-3 – Stephen Nolan	SD-C401-CDP25-208 – Anthony Keogh	SD-C401-CDP25-593 – Newlands Golf Club
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-939 – Sharlene NiCinneide	SD-C401-CDP25-941 – John Finn
SD-C401-CDP25-943 – Georgia Daly	SD-C401-CDP25-946 – Gordon Harris	SD-C401-CDP25-947 – Darren Kennedy
SD-C401-CDP25-957 – Sarah Byrne	SD-C401-CDP25-961 – Cathal O'Keeffe	SD-C401-CDP25-963 – E Savage
SD-C401-CDP25-965 – Paul Carberry	SD-C401-CDP25-970 – Nicola Harper	SD-C401-CDP25-971 – Claire Ryan

SD-C401-CDP25-972 – Lisa King	SD-C401-CDP25-974 – Rebecca Maunsell	SD-C401-CDP25-977 – Yolande Mc Cormack
SD-C401-CDP25-981 – Stephen O'Reilly	SD-C401-CDP25-982 – Valerie Bannon	SD-C401-CDP25-987 – Jessica Lakes
SD-C401-CDP25-988 – Andrew Reilly	SD-C401-CDP25-991 – Gemma Lakes	SD-C401-CDP25-1007 – Shauna Sheridan
SD-C401-CDP25-1017 – Grainne Okeeffe	SD-C401-CDP25-1023 – Aileen Doyle	SD-C401-CDP25-1027 – Orla Walker
SD-C401-CDP25-1041 – Transport Infrastructure Ireland	SD-C401-CDP25-1049 – Jennifer Reilly	SD-C401-CDP25-1054 – Michelle Doyle
SD-C401-CDP25-1068 – Karen Curley	SD-C401-CDP25-1072 – Thornton O'Connor Town Planning	SD-C401-CDP25-1073 – Tanya Corbett Corbett
SD-C401-CDP25-1074 – Sarahjane Donoghue	SD-C401-CDP25-1080 – Damien Conlan Damien Conlan	SD-C401-CDP25-1084 – Fiadhnait Obrien
SD-C401-CDP25-1089 – Stephen O Reilly	SD-C401-CDP25-1093 – Philip Caird	SD-C401-CDP25-1104 – Seán Keogh
SD-C401-CDP25-1105 – Louise Breivik	SD-C401-CDP25-1106 – Kayleigh Kennedy	SD-C401-CDP25-1125 – Conor Byrne
SD-C401-CDP25-1127 – Joanne Mcloughlin	SD-C401-CDP25-1128 – Keith Mcloughlin	SD-C401-CDP25-1130 – Fiona Blake

SD-C401-CDP25-1150 – Sinead Sinéad	SD-C401-CDP25-1154 – Sean O'Doherty	SD-C401-CDP25-1157 – Miriam Fitzpatrick
SD-C401-CDP25-1165 – Jessica Spear	SD-C401-CDP25-1176 – AnnMarie Hendrick	SD-C401-CDP25-1182 – Aodhagan Maunsell
SD-C401-CDP25-1183 – Lorraine Kennedy	SD-C401-CDP25-1186 – Eva Mallon	SD-C401-CDP25-1188 – Sharon Kelly
SD-C401-CDP25-1195 – Angela Minto	SD-C401-CDP25-1206 – Elaine Nestor	SD-C401-CDP25-1209 – Martin Mulleady
SD-C401-CDP25-1213 – Fiona Hegarty	SD-C401-CDP25-1218 – Marie Kelly	SD-C401-CDP25-1220 – Niall O Donnell
SD-C401-CDP25-1230 – Emma Stanley Wade	SD-C401-CDP25-1238 – Jean McDonagh	SD-C401-CDP25-1244 – Joe McDonagh
SD-C401-CDP25-1265 – Dolores Mcardle	SD-C401-CDP25-1283 – Stephen Walsh	SD-C401-CDP25-1292 – Ann Tracey
SD-C401-CDP25-1330 – Olive O'Malley	SD-C401-CDP25-1331 – Steven Billane	SD-C401-CDP25-1334 – Damian Jones
SD-C401-CDP25-1337 – Nicola Jones	SD-C401-CDP25-1338 – N/a	SD-C401-CDP25-1340 – Conor Flood
SD-C401-CDP25-1343 – Ann Keenan	SD-C401-CDP25-1360 – Siobhan Walsh	SD-C401-CDP25-1368 – Stephen O'Reilly
SD-C401-CDP25-1376 – Matthew Colliton	SD-C401-CDP25-1401 – Tony Burke	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage

SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1467 – P. Goode	SD-C401-CDP25-1471 – Dorota Wasielewska
SD-C401-CDP25-1492 – Stephen McCarville	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1536 – Paul Scally
SD-C401-CDP25-1542 – Sean Ward	SD-C401-CDP25-1564 – Colleen Fay	SD-C401-CDP25-1579 – Paul Fay
SD-C401-CDP25-1634 – David Murphy	SD-C401-CDP25-1640 – Sinead Murphy	SD-C401-CDP25-1667 – Emer Gaj-McKeever
SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1685 – Aoife McCarville	SD-C401-CDP25-1725 – Department of Education and Youth
SD-C401-CDP25-1802 – Kingswood Heights Residents Association NIA	SD-C401-CDP25-1861 – Dorene McCarthy	

Summary	CE Response
SDAs and the Subject Site A submission, on behalf of Hibernia Reit Estate Group Limited, welcomes the identification of the subject lands as a Future SDA, noting that this approach aligns with the requirements of the Revised NPF (2025) and associated Section 28 Guidelines. Furthermore, the submission welcomes the objectives set out under Policy CS3, providing a structured framework for advancing the Future SDA lands.	This amendment is in relation to the designation of lands at Newlands, Dublin 24 that are currently zoned Objective 'RU', 'EE', and 'OS' to a 'Future Strategic Long-Term Development Area' (Future SDA) under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028. It should be noted that the current zonings will be retained with the Variation proposing a designation on them which will allow for analysis of the lands to understand the most appropriate land uses within a formal framework and subject to future rezoning. The land parcel in question is c. 101.50ha. **Variation Context and Process**

Notwithstanding this, the submissions requests that a northern portion of the landholding (c. 5.57ha.) directly adjacent to the N7, currently zoned 'EE', be rezoned immediately to 'REGEN' as part of the current Variation. The submission outlines that this portion of the land, within the overall landholding, are brownfield in nature and are capable of supporting Transport Oriented Development (TOD). The submission highlights that a similar approach has been applied within the variation, with regards to Amendment no. 9 Knockmeenagh Framework Site. The submission states that that an immediate 'REGEN' rezoning of the northern 'EE' lands would not compromise or pre-empt the holistic, plan-led approach to the broader Future SDA designation under Policy CS3 **Environment, Climate Action, Biodiversity and Green Infrastructure** A number of submissions raise concerns regarding the biodiversity value of the subject lands, the immediate/wider Green Infrastructure (GI) network and their role in supporting climate mitigation and resilience. Several submissions detail that the lands are a highly biodiverse area, that support a range of habitats and	Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation also considered the need for longer term lands to facilitate delivery of housing targets up to 2040. These identified the amendments to include objectives for Future Strategic Long Term Development Areas (SDAs) at Adamstown South and West, Newlands, Belgard and Grangecastle with a focus on Transport Oriented Development (TOD). The zoning of these lands will be a matter for the next County Development Plan. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet: → The housing shortfall to meet the baseline targets for 2028 → Built-in additional capacity to meet the 2028 targets → The long-term housing needs of the county to 2040 and beyond **SDAs and the Subject Site** "Strategic Development Areas" (SDAs) are long-term development areas identified for significant growth focused on transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and required alignment with significant investment in infrastructure and services.

species, including protected wildlife such as badgers and hedgehogs, as well as bird species. Particular reference is made to existing wetland areas within the subject lands, which support seasonal breeding of protected species. A number of submissions detail that the subject lands form part of the wider GI corridor serving the Tallaght-Clondalkin area, which provides an important ecological and biodiverse corridor. Several submissions state that the subject lands, represent one of the last remaining undeveloped green areas, functioning as an important visual and environmental buffer ('Green Belt') between Tallaght and Clondalkin, including improving air quality, particular in the context of the neighbouring N7 corridor. Several submissions highlight that rezoning the subject lands for residential development, in a context where public transport is not yet fully operational at high capacity, would increase private car dependency, leading to higher vehicle emissions and undermining national and local climate targets. Submissions detail that the subject lands function as an active carbon sink and urban cooling space, and that development on these lands would increase hard surfacing, exacerbate heat and runoff effects.	It is emphasised that the subject lands, identified as Future SDA, are subject to future rezoning and do not provide for development at this moment in time. Their purpose in being identified as part of this Variation is to respond to the NPF Implementation Guidelines which requests that planning authorities consider the long-term housing needs of the County and to give clear strategic direction to future development locations to enable the lead-in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for the release of such lands as the need arises in the 2030s. Policy CS3: Future Long-Term Development Areas, and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. This process ensures that key considerations, including environmental constraints and infrastructure requirements, are fully assessed at the appropriate time with regard to immediate and/or emerging national guidelines. **Request for REGEN Zoning** The submission outlining the extent of the landholding, its support for Policy CS3 and the identification of the subject lands as a Future SDA, together with a request to rezone a portion of the subject lands to 'REGEN', is noted. It is considered that the introduction of a piecemeal rezoning, within the overall Newlands Future SDA framework, would undermine the co-ordinated and holistic approach required under Policy CS3 and its associated objectives CS3 objective 1, 2, and 3.

Several submissions state that the EU Nature Restoration law and Irelands National Biodiversity Action Plan mandate the protection and restoration of the subject land's habitats. A submission was received from the Department of Housing, Local Government and Heritage (NPWS), in relation to the four areas proposed as Future Strategic Long-Term Development Areas (Future SDAs). As per the submission, it is detailed that all the Future SDAs have a significant biodiversity value but does not provide further comment in relation to the subject lands. **Phasing, Overdevelopment, and Impact on Community and Social Facilities** A number of submissions raise significant concern that the proposed rezoning at Newlands, in conjunction with the other variation lands, would result in excessive and unsustainable levels of development within the immediate and wider area. It is emphasised that the cumulative impact of existing and permitted development, will place significant pressure on existing physical and social infrastructure. In particular, access to GP and primary health care services, increased waiting times for childcare facilities and community facilities.	The Planning Authority acknowledges the subject lands development potential, suitability for TOD, including its alignment with the requirements of the Revised NPF (2025) and associated Section 28 Guidelines. However, these matters will be fully considered as part of the future plan-led assessment of the overall lands, it is considered that rezoning a portion of the landholding, in insolation, in advance of this process, would pre-empt the outcome of the detailed studies and analysis required under Policy CS3. Separately, it is noted that Amendment No. 9 and its associated Specific Local Objective (SLO), is dependent upon a phasing and delivery plan in the parameters of the Clondalkin Local Area Plan (LAP), in conjunction with liaison with the TII, NTA and Landowners. Accordingly, it is considered that the identification of the subject lands in full as Future SDA is appropriate, at this moment in time, and does not prejudice the existing uses, while ensuring the long-term strategic potential of the land can be considered in a co-ordinated plan led manner. **Environment, Climate Action, Biodiversity and Green Infrastructure** The Planning Authority notes concern regarding climate mitigation, potential loss of green infrastructure corridors, and the subject lands biodiversity value. In this regard, Policy CS3 outlined above and associated Objectives CS3 1 and 3 within the Variation, ensures that detailed studies and analysis will be undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach.

In addition, a number of submissions refer to the potential scale of development on the subject lands, noting that the extent of the site could facilitate a significant quantum of housing, and detail that this level of development would not be appropriate having regard to existing traffic conditions, lack of public transportation and absence of detailed investment. **Heritage** A number of submissions raise concern regarding the heritage and cultural significance of the subject lands. Several submissions identify the subject lands as the 'Whitehall' lands and refer to its context and position within the wider historic landscape of the Tallaght-Clondalkin area. Submissions highlight that development of these lands, would alter and erode its historic character and associated landscape. In particular, a number of submissions refer to the lands as the historic home of Katherine Tynan (a Protected structure – Ref. 197). Several submissions highlight the cultural, literary and educational value associated with the subject lands and the opportunity for heritage recognition and public engagement. Submissions highlight that the development of the subject lands, has the ability to diminish the	*CS3 Objective 1:* *To commence preparatory studies and analysis of the Future SDAs, as identified on the development plan maps, to understand the existing land uses and ecological sensitivities and to inform the preparation of future proposals for rezoning to meet the needs of the County through an holistic approach to plan making. The exact lands to be brought forward as future rezoning may change according to the outcome of these studies.* *CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* The Council acknowledges submissions expressing concern that further development could increase car dependency, emissions and environmental pressures. These concerns are fully recognised within the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) and the Couty Development Plan, all of which seek to move away from historic "business-as-usual" patterns of dispersed, car-dependent development. It is considered that compact growth in accessible locations, as defined by the Compact Settlement Guidelines (2024), rather than continued

significance of heritage assets. A number of submissions emphasise the importance of protecting and conserving heritage features, including the preservation and restoration of existing protected structures. **Housing** A number of submissions raise concern regarding the potential scale, height and density of development that could arise from the proposed rezoning. Several submissions express concern that any future development on the subject lands could lead to high-density proposals, including tall buildings, which are considered to be visually inappropriate and out of character with the surrounding area. Several submissions raise concern regarding housing typology and tenure, with particular reference to 'build-to-rent' accommodation. A number of submissions detail that this form of development does not support the establishment of long-term, settled communities, and could impact community cohesion over time. **Parking** Several submissions raise concern that insufficient on-site parking at the subject lands, would result in overspill parking into adjoining residential estates. This increase in on-street parking would reduce	outward expansion into less connected areas, represents the most effective long-term environmental response, subject to a comprehensive plan-led approach under Policy CS3. Any future development proposal(s) will be brought forward through a comprehensive plan-led process, informed by detailed environmental assessment, including Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and site-specific ecological studies. Furthermore, County Development Plan policies will be required to be conformed with, having regard to immediate and/or emerging national guidelines. At this time, the Government has yet to submit its proposals for the Nature Restoration Law to Europe. Once there is legislation relating to this the Planning Authority will ensure that any requirements are integrated into the planning process. Accordingly, biodiversity and green infrastructure, including climate mitigation and resilience, will be carefully considered as part of a plan-led process to the Future SDA ensuring that such features are appropriately protected, integrated and, where possible, enhanced through a robust, plan-led assessment process in line with national, regional and local policy objectives. **Phasing, Overdevelopment, and Impact on Community and Social Facilities** The Planning Authority acknowledges the concerns raised regarding the cumulative impact of development, infrastructure capacity and the perceived risk of overdevelopment within the Tallaght-Clondalkin area. It is emphasised that the identification of the lands as a Future SDA does not give rise to any immediate development. Rather, it establishes

accessibility, obstruct footpaths, cycle routes, and disrupt residential amenity. A submission requests that the council invest in 'Parking Hubs', to alleviate restrictions in parking for new housing developments. **Parks and Open Space** A significant number of submissions raise concern regarding the provisions of parks and open space within the wider Tallaght-Clondalkin area. Several submissions state there is a lack of large, accessible public green spaces serving the existing and growing population, reference is made to Ballymount Park as a 'pocket park' with limited facilities. Several submissions detail that the subject lands, are an existing green buffer between urban areas, with significant potential to contribute to recreational amenity. In this regard, a number of submissions detail that the subject lands represent an opportunity to provide a major regional public park, serving a wide catchment, including Tallaght, Kingswood and Clondalkin. Submissions detail potential park facilities, that include walking and cycling routes, sports facilities, biodiversity areas, and community and educational spaces.	a framework in which future development, will be subject to a comprehensive plan-led approach under Policy CS3. The CDP provides a clear policy framework to ensure that residential development is supported by appropriate social and community infrastructure, including childcare facilities, educational provision, open space, and recreational amenities. CS3 Objective 3, outlined above and included in the proposed Variation for SDAs requires that any future planning framework addresses social infrastructure requirements and ensures that development is phased in line with the delivery of supporting services and facilities. Accordingly, it is considered that the concerns raised can be appropriately addressed through the plan-led process, where the need to provide new and/or enhanced community infrastructure as part of any future development will be examined, and does not preclude the identification of the lands. **Heritage** The Planning Authority acknowledges the heritage and cultural concerns raised in submissions in respect of the Newlands Future SDA, including their association with the 'Whitehall' estate, and connection to Katherine Tynan and her home (Protected Structure Ref. 197). The importance of protecting heritage assets, their setting and the wider historical landscape context is noted, as is the need to ensure that such features are appropriately safeguarded and considered in any future plan-led approach to the subject lands. The County Development Plan provides strong policies and objectives regarding the protection of the built, natural and archaeological

Zoning and Policy A number of submissions detail that the rezoning of the subject lands is inconsistent with the objectives of the Revised NPF, which prioritises compact growth, the consolidation of existing urban areas and the redevelopment of brownfield and services lands in advance of large-scale greenfield expansion. It is contended that the subject lands, as a greenfield site, do not align with the aforementioned parameters. In addition, submissions highlight the importance of aligning future development with strategic transport infrastructure and request that policy provisions support the integration of same, emphasising the need to update transport strategies to reflecting an increase in population growth. A number of submissions raise broader policy considerations, regarding the availability and use of publicly owned lands, detailing that sufficient land exists elsewhere within the state to accommodate housing needs. **Public Transport** A number of submissions highlight that current public transportation services in the area, including bus and Luas connections, are operating at or near capacity. It is contended that additional development	heritage of the County, in particular Policy NCHB1, NCBH13, and NCBH19. Furthermore, Policy CS3: Future Long-Term Development Areas and its associated objectives (CS3 Objective 1 and 3), requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Any future development proposal(s) on the subject lands, will have regard to the CDP policy and objectives, ensuring that such features are appropriately protected, integrated and, where possible, enhanced through a robust, plan-led assessment process in line with national, regional and local policy objectives. **Housing** Concerns regarding density and building height are noted. Residential density is guided by national policy, particularly the Sustainable Residential and Compact Settlement Guidelines (2024), which require efficient use of well-located land proximate to services and public transport. Detailed matters such as density, height and layout will be determined through a plan-led process and further to inform assessment at planning application stage, having regard to applicable national guidance and Development Plan standards. Any future proposal(s) will be required to demonstrate high-quality design and appropriate integration with the surrounding area. The Planning Authority notes that the designation of these lands for future development does not predetermine housing typology, building

would increase demand and exacerbate an already overburdened public transport network. Concerns are also raised regarding the delivery of planned improvements, with submissions noting delays in the implementation of BusConnects and wider active travel infrastructure. It is contended that existing and planned measures, will be insufficient to accommodate the additional growth at the subject lands. A submission advocates for the extension of the Metrolink to Tallaght, as a long-term solution to support population and employment growth, free capacity on existing transport corridors, and provide enhanced connectivity in the Southwest of the County. The submission notes a commitment in the 2025 Programme for Government which includes the commissioning of an independent feasibility study into continuing MetroLink from city to Southwest Dublin. Furthermore, a submission was received from the National Transport Authority (NTA), The NTA notes the identification of future strategic long-term development areas at Adamstown South and West (Outer), Belgard, Newlands, Grange Castle, and the objectives which apply to their progress.	height or tenure mix, as these matters will be addressed through a master planning process and assessed at planning application stage in accordance with site-specific design and policy requirements. All future development will be subject to Part V requirements (or subsequent replacement legislation), ensuring the delivery of social and affordable housing, alongside CDP objectives requiring a mix of tenure and housing types, supporting balanced and inclusive communities, with consideration of relevant and appropriate Section 28 Guideline objectives, as required. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Parking** The Planning Authority notes concern regarding parking pressure and potential overspill into surrounding areas. At a plan-led scale, parking will be considered as part of the overall understanding of the needs of any future development and its associated infrastructure. Parking will then be assessed in further detail at planning application stage, where it must be demonstrated that it is in accordance with the standards set out in the CDP and relevant national guidance. Any future development will be required to comply with the SDCC parking standards, alongside National Policy Objectives (NPO's) under the Revised NPF, of which promote compact growth and reduced car dependency/modal shift. Parking provision will be determined through detailed Traffic and Transport Assessments and Mobility Management

The NTA is satisfied that in the long-term, development at these locations could potentially align with the principles of transport and land-use integration as long as their development is subject to a statutory land use plan which provides for the phasing of growth in line with the provision of transport infrastructure and services. In the case of Newlands in particular, this should include an assessment of the interface between any emerging developments and the Red Cow Luas services and depot facilities, and the potential impacts on the N7 National Road. It is the view of the NTA that the most appropriate mechanism to achieve the above is through undertaking Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII), as part of the preparation of statutory land use plans. The need for an ABTA for these sites should be included within the objectives under Policy CS3. **Schools** A number of submissions raise concerns regarding the capacity of existing schools within the Tallaght area. A number of submissions detail that primary and secondary schools in the area, are already under pressure to due to increasing residential	Plans, or other mechanisms as required, ensuring it is responsive to location, accessibility, and proximity to high-capacity public transport and active travel infrastructure in line with transport-oriented development principles. Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 Objective 3, and do not preclude the identification of the subject lands as a Future SDA. **Parks and Open Space** The Planning Authority notes the number of submissions which promote the protection and development of the Whitehall Lands as a regional park, presenting this as a key alternative to residential rezoning. However, the SDCC Parks and Open Space Strategy (2025) details that the wider area is already well served by existing regional parks within an appropriate accessibility catchment, and that national and local planning policy does not identify a strategic requirement for an additional regional scale park at this location. The County Development Plan standards states that residents should be within approximately 5km of a regional park which is already met, with the subject lands located in close proximity to established and significant regional parks, including Tymon Park, Corkagh Park and Dodder Valley Park. These facilities collectively provide a comprehensive range of recreational, ecological, and amenity functions at a regional level, serving the wider Tallaght–Clondalkin area. Furthermore, the CDP identifies a clear spatial priority for future regional park provision elsewhere, most notably through NCBH7 Objective 4, which supports the development of a Liffey Valley

development. It is contended that further development would exacerbate these pressures, driving demand for school places for both existing and future residents. In this regard, the Department of Education and Youth (DoEY) notes that the Future SDAs near Tallaght, encompassing Newlands and Belgard Road, would generate a level of development that is likely to require the provision of approximately three primary schools and one post-primary school, at the subject lands. **Surface Water and SFRA** A number of submissions raise concerns regarding surface water management and drainage in relation to the subject lands. Several submissions emphasise that the subject lands contain permeable soils and wetlands, that absorb rainfall, reduce surface runoff and contribute to flood mitigation within the immediate and wider area. Submissions raise concern that development of the subject lands would result in increased hardstanding surfaces, reducing permeability, and surface water runoffs would increase pressure on existing drainage infrastructure.	Regional Park. This objective reflects a strategic, evidence-based approach to open space planning, focusing on enhancing the recreational value, accessibility, biodiversity, and green infrastructure role of the Liffey Valley, rather than duplicating provision in areas already adequately served. The Planning Authority notes that Ballymount park is classified as a Neighbourhood park, under the SDCC Parks and Open Space Strategy (2025). It is noted that the CDP contains a robust framework for the provision of public open space and green infrastructure, including requirements for high-quality, accessible open space as part of new development. Furthermore, Policy CS3: Future Long-Term Development Areas and its associated objectives (CS3 Objective 1 & 3), requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Accordingly, it is considered that the recreation and open space provisions will be assessed and addressed, prior to any rezoning, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Zoning and Policy** The Planning Authority acknowledges the concerns raised regarding consistency with national planning policy, including the principles of compact growth, and the prioritisation of brownfield and serviced lands.

Concerns are also raised regarding the sensitivity of the area to flooding, including pluvial flooding associated with intense rainfall. Submissions refer to the Dublin City Development Plan 2022-2028, Strategic Flood Risk Assessment (SFRA), which highlights the river Camac as being susceptible to flooding.

Traffic and Roads

A significant number of submissions raise concerns regarding traffic congestion, road capacity and the potential impact of future development on the surrounding road network.

Submissions highlight that the existing transport network, including the N7, Belgard Road, Newlands Cross and the M50, is already operating at or near capacity, with frequent congestion at peak hours. It is contended that additional development would increase traffic volumes and worsen existing conditions.

In this regard, a submission was received from the Transport Infrastructure Ireland (TII), with a recommendation with regard to the subject lands:

TII is of the opinion that the proposed blanket designation of the Newlands Future Strategic Long-Term Development Area in the absence of a clear evidence-based framework for the master planning of this area to be undertaken potentially in

In response to the NPF Implementation Guidelines requesting Planning Authorities to consider the longer term needs to meet the housing targets up to 2040, the proposed Variation has identified the subject lands as having the potential to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP.

The lands are within the Dublin Metropolitan Area and within Dublin City and Suburbs. National Policy Objective (NPO) 16 of the Revised National Planning Framework states:

To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

City	Population 2022	2018 NPF	Population Growth to 2040[84]		Minimum Target Population 2040
		% Range 2016-2040	% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth (extract from Revised NPF 2025)

In addition, National Policy Objective 8 requires:

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

conjunction with the proposed amendment ref. no. 20 for the Belgard Road Area is premature. *In accordance with Chapter 2 of the Spatial Planning and National Roads Guidelines for Planning Authorities, TII is of the opinion that an integrated approach to the design of the identified Newlands and Belgard Road proposed Strategic Long-Term Development Areas should include a set of principles and criteria designed to address the operational and safety matters associated with both the TEN-T Core national roads, existing and future Luas operational requirements while ensuring a high standard of access by public transport, foot and private car so that the variety of retail, enterprise and employment zones / areas can be easily accessible by all modes of transport and all sections of society.* *To assist in such exercises, TII and the NTA jointly prepared Area Based Transport Assessment (ABTA) Guidance. A collection of TII and NTA documents form ABTA guidance originally published in 2018 and currently consisting of the NTA's ABTA Advice Note 2018, ABTA and LTPs – Supplementary Advice Note 2024, ABTA Pilot Methodology and Templates and TII Publication PE-PDV-02046 - ABTA Guidance Notes.* *The ABTA methodology is the recommended approach to the development of Local Transport Plans (LTPs). LTPs are recognised by the EMRA*	Therefore, the proposed lands meet the criteria set out in NPO 8 and 16. They are also located in an area which facilitates transport-oriented development, in compliance with NPO 10 which states: *Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.* South Dublin has significant areas of land which are subject to the REGEN zoning and will deliver on brownfield lands. In particular, City Edge (Ballymount / Naas Road) is one of the biggest urban regeneration projects in Europe and is subject to a separate Variation to the County Development Plan. The Tallaght Local Area Plan lands also represent an area where planned regeneration of brownfield lands is underway. However, to meet the longer term housing targets further lands are required to be identified. In this regard, and as outlined above, the subject lands are located in an area which accords with the needs of and approach to compact development within national policy. **Public Transport** The Planning Authority acknowledges concerns regarding the capacity of existing public transport services and the need to align development with high-capacity public transport infrastructure. It is emphasised that the Future SDA designation is intended to support the long-term integration of land use, including existing and planned public transport infrastructure, in accordance with the Revised NPF and Compact Settlement Guidelines (2024).

RSES as the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of the NPF's objective of 'compact smart growth'. *TII is available with the NTA to discuss approaches to address these matters with a view to developing resolution of these matters associated with this element of this Variation.* **Water and Wastewater** A submission was received from Uisce Éireann (UÉ), in relation to the site and the accessibility of services from a UÉ point of view. The following is extracted from the submission in full: *'We have no objections to the proposed material alterations to allow for additional housing growth (including changes to land zoning & residential density ranges). The 9B strategic sewer runs through most of South Dublin with effluent flows terminating at Ringsend Treatment Plant. The 9B sewer is a combined sewer and is constrained. UÉ are currently looking at potential solutions which may include, sewer duplication and storage. In the interim, separation of storm water, removal of infiltration, misconnections and SUDs solutions must be looked at.'* Furthermore, UÉ specifically provide comments in relation to Amendment No. 19, Newlands:	It is noted that the permitted MetroLink project runs from the City Centre to Swords, serving Dublin Airport. The Greater Dublin Area Transport Strategy 2022-2042 includes Measure LRT2 (Further Metro Development), as follows: *Further Metro Development In reviewing and updating the Transport Strategy, which takes place every 6 years, the NTA will assess the requirement to provide additional Metro lines in the GDA based on updated forecast demand for travel and on emerging significant changes in land use and spatial policy, including previously considered options to extend Metrolink southwards towards UCD, or along the existing Luas Green Line, or towards South West Dublin.* The Strategy also identifies the potential for longer-term public transport upgrades, including light rail provision, in corridors where demand is anticipated to exceed capacity. In this regard, it is noted that the GDA Strategy includes a Post-2042 Light Rail Network, which identifies a proposed Luas from the city centre by way of Knocklyon to Tallaght, subject to Measure LRT2. Furthermore, in support of high-capacity public transport solutions for Dublin southwest, the South Dublin County Development Plan already contains objective SM3 Objective 7 which states: *To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin southwest, including examining the feasibility of Metro and / or Luas, serving areas including Ballyboden, Ballycullen / Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure and the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin southwest.*

'Long Term Strategic Water: Significant trunk watermain network bounding the site. Local upgrades required *Sewer network: Substantial upgrades likely.'* **Utilities** A submission was received from Electricity Supply Board (ESB), with regard to the overall variation, having no site specific objections to the variation, ESB concluded the following: *ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly:* • *Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the level of operational activities ongoing at our high-voltage substations within South Dublin are protected* • *A collaborative partnership between South Dublin County Council and ESB to proactively*	The identification in the submission, of a commitment in the 2025 Programme for Government, to commission an independent feasibility study into continuing MetroLink from city to Southwest Dublin is noted. The inclusion in the GDA Strategy of Measure LRT2 and a post 2042 light rail link promotes the principle of a new light rail link between the city centre and Tallaght by way of Knocklyon. While the submission suggests that this is not strong enough there is also the existing objective in the current County Development Plan and SDCC will continue to engage with the NTA and TII to deliver on public transport infrastructure to meet the needs of the county. Furthermore, as evidence of its commitment SDCC is supporting residents to carry out a socio-economic appraisal of a Metrolink extension through the provision of financial and expert resource. Given the existing strong support in the CDP and SDCCs demonstrated commitment further objectives as part of this variation would only repeat the sentiment of the existing objective and is neither required nor appropriate. The Planning Authority welcomes the NTAs view that the Future Strategic Long-Term Development Areas could potentially align with the principles of transport and land-use integration subject to a statutory land use plan providing for growth in line with the provision of transport infrastructure and services. The intention of the Future SDA designation is to allow for the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders including the NTA and TII to plan for the release of lands as need arises in the 2030s alongside the necessary infrastructure, to inform rezoning proposals.

identify and secure appropriate sites for the development of essential energy infrastructure will allow both organisations to plan proactively, identify a viable strategic site, and ensure infrastructure keeps pace with the county's long-term growth objectives. • *ESB respectfully requests that due consideration is given to the need for critical upgrades and capacity enhancements across South Dublin, as these are essential to address current grid constraints, support renewable energy integration, and enable sustainable residential and industrial growth.* • *Ensuring that public utilities are permissible under all zoning objectives is critical to enabling timely, efficient delivery of network capacity upgrades and supporting sustainable local growth and climate goals.* • *Recognising the opportunities for early engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways and the provision of ducting/underground cabling.* **Miscellaneous** A number of submissions raise concern regarding the naming of the subject lands; it is stated that the lands are historically referred to as the 'Whitehall' lands and detail that this should be reflected in official planning documents.	The observations on Newlands and the interface with the existing transport infrastructure is noted and will be a key consideration as part of the plan-led approach to these lands set out in Policy CS3. An objective within that policy clearly sets out the intent for a statutory process and the need for sustainable transport options as follows: *CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* The benefit that an Area-Based Transport Assessments (ABTA) could bring to the process is noted and considered appropriate to include by way of a further objective under Policy CS3 as follows: To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows: **CS3 Objective 4** **To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.** **Schools**

A submission, with particular regard to the Newlands Golf Club, details that engagement should be encouraged where proposals may materially affect boundary conditions, amenity or operational continuity.	The Planning Authority notes the submissions in relation to the concern regarding school places within the Future SDA lands at Newlands. The information provided by the Department of Education and Youth, that there may be a requirement of 3 primary schools and 1 secondary school for the two areas at Newlands and Belgard is welcomed. The Planning Authority would also note that, the Tallaght Town Centre LAP has a school site reserved in the town centre, in close proximity to the Luas Redline stops (Tallaght, Tallaght Hospital, and Belgard), as well as the future BusConnects interchange by Tallaght Luas stop. Having regard to the above, it is important to note: Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach, include the assessment of existing or potential historic structures. The Planning Authority will continue to work closely with the Department as part of the plan-led process prior to zoning to ensure that the necessary school infrastructure is included to meet the projected demand. **Surface Water and SFRA** While concerns raised regarding surface water management and potential knock effects are acknowledged, the Planning Authority is satisfied that the County Development Plan contains robust policy and objectives, together with Strategic Flood Risk Assessment (SFRA) and SDCCs SuDS Guidance, to ensure that surface water matters are appropriately addressed at plan-led stage and will inform the future

	development of the lands. SDCC also notes the inclusion of the DCC SFRA as part of a submission. It is emphasised that the identification of the lands as a Future SDA does not give rise to any immediate development. Rather, it establishes a framework in which future development, will be subject to a comprehensive plan-led approach under Policy CS3. Development cannot proceed without clear demonstration that surface water and flood risk issues have been fully assessed and mitigated in a manner that protects existing and future users, safeguards amenity and mitigates residual adverse impacts. Notwithstanding the submissions and documents submitted as part of the consultation, SDCC undertook a SFRA for the proposed Variation and the specific sites. Flooding and Strategic Flood Risk Assessment (SFRA) have been considered in accordance with the Flood Risk Management Guidelines for Planning Authorities (DOECLG, 2009), Circular PL 2/2014, the South Dublin Strategic Flood Risk Assessment (2022) and relevant studies. The Planning Authority emphasises that any future development proposals will be subject to site-specific Flood Risk Assessment, prepared by a suitably qualified Chartered Engineer, in accordance with the aforementioned Guidelines. These assessments will be required to address both fluvial and pluvial flood risk, taking account of climate change projections and the precautionary principle, as set out under Chapter 12.11 of the CDP and the Flood Risk Guidelines. **Traffic and Roads**

	Concerns relating to traffic congestion and impacts on the surrounding road network are noted. Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. In this regard, a submission was received from the Transport Infrastructure Ireland (TII), which suggested that the designation was in the absence of '*a clear evidence-based framework for the master planning of this area'* and recommended that an Area Based Transport Assessment be carried out for the lands. TII noted the need to protect the operational and safety matters of the national road network and Luas. In this regard they indicated that they would be available with the NTA to discuss approaches to address these matters with a view to developing resolution of these matters associated with this element of this Variation The purpose of the designation of the SDAs is to carry out analysis of the lands with the relevant stakeholders, including TII and NTA, to ascertain the different requirements to bring the lands forward for identified development types. The Council therefore welcomes the fact that TII are available to engage in this process. The inclusion of an ABTA approach was also put forward by the NTA and will be included as a recommendation for clarity. The Planning Authority acknowledges TII's role under the Spatial Planning and National Roads Guidelines (2012) and recognises the importance of protecting the strategic function of the national road network, including the TEN-T Core and Comprehensive Networks.

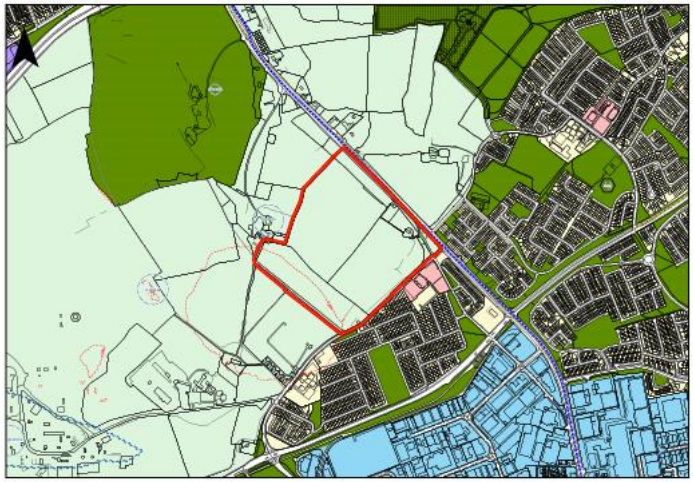
	It is noted that the CDP contains a number of policy and objectives (Chapter 7 - Policy SM4, Policy SM6, Chapter 11 – Policy IE8, and Chapter 12 - Section 12.7.2), requiring that development proposals adjacent to and/or affecting national roads: • Demonstrate that the operation, safety and capacity of the national road network are not compromised • Avoid direct access onto national roads • Address noise, air quality, lighting and drainage impacts through appropriate mitigation It is considered that, subject to implementation of appropriate mitigation measures which can be assessed and agreed at plan preparation stage, traffic and road impacts can be satisfactorily managed, in accordance with CS3 objectives 1 to 3, and do not preclude the identification of the subject lands as a Future SDA. **Water and Wastewater** The CDP recognises the importance of aligning development with the provision of adequate water services infrastructure and supports the ongoing delivery of upgrades to accommodate projected growth. It is emphasised that the identification of the lands as a Future SDA does not result in any immediate demand on water or wastewater infrastructure. Rather, it provides a framework within which infrastructure requirements can be identified, assessed and delivered in a coordinated manner. Policy CS3 requires that any future development proposals are subject to detailed infrastructure assessment and are contingent on the

	availability of sufficient capacity, including engagement with UÉ to ensure alignment with infrastructure delivery. UÉ have indicated the following in relation to Amendment No. 19, Newlands: *'Long Term Strategic Water: Significant trunk watermain network bounding the site. Local upgrades required* *Sewer network: Substantial upgrades likely.'* While infrastructure constraints are acknowledged, it is considered that these items will inform the timing and phasing of any future development and do not represent a barrier to the long-term identification of the lands. **Utilities** The submission received from ESB, with regard to the overall variation, is noted. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the network must be agreed with ESB by the developer as part of new development proposals. In relation to other utilities, including, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. However, the plan-led process supported by the

	SDA will allow for engagement with utility providers in advance of zoning of the lands. **Miscellaneous** The Council acknowledges that a number of submissions refer to the lands as their historic name - 'Whitehall' lands. The naming of lands within the variation is done for ease of wider reference, rather than to reflect accurate locational detail. The historic and cultural significance of the area is captured above under 'Heritage'. In relation to engagement, any future development proposals will be advanced through a plan-led framework under Policy CS3, which will include stakeholder engagement and consultation at the appropriate stages. Issues pertaining to boundary treatment and amenity, can be examined as part of the detailed analysis of the lands and as set out in the CDP, can be further addressed through the development management process where required. **Conclusion** Having regard to the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) request that planning authorities consider the long-term housing needs of the County for the remaining period of the current adopted plan and the lifespan of the new 10-year development plan; to the need to give clear strategic direction to future development locations under the next 10-year County Development Plan; to the need to enable the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of such lands as the need arises in the 2030s; and

	to the location of the proposed SDA within the Dublin City and Suburbs settlement area, it is considered that the identification of lands at Newlands as a Future SDA is appropriate, subject to further detailed analysis of the lands as set out in CS3 Objective 1.
CE Recommendation To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows: **CS3 Objective 4** **To include Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.**	

AMENDMENT NO. 20 - BELGARD ROAD



Existing

Proposed

Submission No.

SD-C401-CDP25-593 – Newlands Golf Club

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-998 – Anna Witkowska

SD-C401-CDP25-1041 – Transport Infrastructure Ireland

SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage

SD-C401-CDP25-1443 – Electricity Supply Board

SD-C401-CDP25-1474 – SLR Consulting Ireland

SD-C401-CDP25-1513 – National Transport Authority

SD-C401-CDP25-1542 – Sean Ward

SD-C401-CDP25-1676 – South Dublin Conservation Society

Summary	CE Response
SDAs and the Subject Site A submission outlines that the subject lands form part of an extensive landholding in the ownership of Roadstone Ltd., which comprise of an established and active quarry (Belgard Quarry). The submission states that the quarry and associated lands, are of strategic national and regional importance for the supply of aggregates and construction materials, with direct impacts upon housing delivery and infrastructure provisions. The submission details that the designation of the subject lands as Future SDA, is premature having regard to the ongoing and long-term use of the lands. Quarrying activities are expected to continue beyond the lifetime of the current Development Plan and into the subsequent plan period, therefore it is contended that the use of the identified lands, for residential development, would be at conflict with the existing quarry use. The submission emphasises the strategic importance of aggregate supply, in supporting national policy objectives, including housing delivery targets as set out in the Revised NPF and associated guidelines.	This amendment is in relation to the designation of lands at Belgard, Cookstown that are currently zoned Objective 'RU' to a 'Future Strategic Long-Term Development Area' (Future SDA) under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028. The land parcel in question is c. 28.64ha. **Variation Context and Process** Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation also considered the need for longer term lands to facilitate delivery of housing targets up to 2040. These identified the amendments to include objectives for Future Strategic Long Term Development Areas (SDAs) at Adamstown South and West, Newlands, Belgard and Grangecastle with a focus on Transport Oriented Development (TOD). The zoning of these lands will be a matter for the next County Development Plan. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet: → The housing shortfall to meet the baseline targets for 2028 → Built-in additional capacity to meet the 2028 targets

In this regard, reference is made to the following documents: • Office of the Planning Regulator (OPR): 'Case Study Paper CSP07 - Quarries and the Local Authority Development Plan' • Irish Concrete Federation (ICF): 'Essential Aggregates – Providing for Ireland's Needs to 2040' • Irish Concrete Federation (ICF): 'Essential Aggregates – An Evidence-Based Assessment to Inform Ireland's Planning Policy' The above items, highlight the significant projected demand for aggregates, alongside emerging supply constraints, particularly within the Greater Dublin Area (GDA). Furthermore, the submission reinforces the standing and nature of existing policy and objectives within the County Development Plan (CDP), in particular Policy EDE25 and EDE25 Objective 5. **Traffic and Roads** Several submissions highlight congestion on the Belgard Road and surrounding network. It is contended that additional residential development would worsen existing traffic conditions. A submission details that an increase in land-use intensity would have a subsequent effect on traffic access and road safety. Particularly with regard to	→ The long-term housing needs of the county to 2040 and beyond **SDAs and the Subject Site** The submission outlining the extent and operational requirements of Belgard Quarry is noted, as is the detail and supporting documents regarding the supply of aggregate materials. Having regard to same, it is noted that "Strategic Development Areas" (SDAs) are long-term development areas identified for significant growth focused on transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and required alignment with significant investment in infrastructure and services. It is emphasised that the subject lands, identified as Future SDA, are subject to future rezoning and do not provide for development at this moment in time. Their purpose in being identified as part of this Variation is to respond to the NPF Implementation Guidelines which requests that planning authorities consider the long-term housing needs of the County and to give clear strategic direction to future development locations to enable the lead-in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for the release of such lands as the need arises in the 2030s. Policy CS3: Future Long-Term Development Areas, and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach.

the Newlands Golf Club, including any subsequent effect upon same via construction activity including noise, dust and lighting impacts. **Public Transport** A submission raises concern regarding the alignment of increased housing targets with existing and planned public transport capacity. While supporting compact growth and concentration of development within Future SDA's is noted (including lands at Belgard Road), it is contended that current and planned public transport infrastructure (particularly the Luas Red Line and DART+ South West), does not have sufficient capacity to accommodate the scale of growth proposed. The submission advocates for the extension of the Metrolink to Tallaght, as a long-term solution to support population and employment growth, free capacity on existing transport corridors, and provide enhanced connectivity in the Southwest of the County. The submission notes a commitment in the 2025 Programme for Government which includes the commissioning of an independent feasibility study into continuing MetroLink from city to Southwest Dublin.	This process ensures that key considerations, including the operational lifespan of the quarry, safeguarding of aggregate resources (as supported in the CDP; Policy EDE25 and EDE25 Objective 5), environmental constraints and infrastructure requirements, are fully assessed at the appropriate time with regard to immediate and/or emerging national guidelines. It is considered that the identification of the subject lands as Future SDA is appropriate, at this moment in time, and does not prejudice the continuation of the existing quarry use, while ensuring the long-term strategic potential of the land can be considered in a co-ordinated plan led manner. **Traffic and Roads** Concerns relating to congestion on Belgard Road and the surrounding road network are noted. Policy CS3: Future Long-Term Development Areas and its associated objectives, requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Any future assessment will consider the capacity of the existing road network, identify required mitigation measures, and assess impacts on adjoining land uses, including the Newlands Golf Club. Furthermore, should any future proposal(s) on the site arise, they would remain subject to a Transport and Traffic Assessment through the development management process and be required to meet the appropriate CDP Policies and Objectives.

Furthermore, a submission was received from the National Transport Authority (NTA), The NTA notes the identification of future strategic long-term development areas at Adamstown South and West (Outer), Belgard, Newlands, Grange Castle, and the objectives which apply to their progress. The NTA is satisfied that in the long-term, development at these locations could potentially align with the principles of transport and land-use integration as long as their development is subject to a statutory land use plan which provides for the phasing of growth in line with the provision of transport infrastructure and services. In the case of Newlands in particular, this should include an assessment of the interface between any emerging developments and the Red Cow Luas services and depot facilities, and the potential impacts on the N7 National Road. It is the view of the NTA that the most appropriate mechanism to achieve the above is through undertaking Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII), as part of the preparation of statutory land use plans. The need for an ABTA for these sites should be included within the objectives under Policy CS3. **Environment, Biodiversity and Green Infrastructure**	Accordingly, it is considered that the above items will be assessed and addressed, prior to any rezoning, in accordance with CS3 Objective 3, and do not preclude the identification of the subject lands as a Future SDA. **Public Transport** It is noted that the permitted MetroLink project runs from the City Centre to Swords, serving Dublin Airport. The Greater Dublin Area Transport Strategy 2022-2042 includes Measure LRT2 (Further Metro Development), as follows: *Further Metro Development In reviewing and updating the Transport Strategy, which takes place every 6 years, the NTA will assess the requirement to provide additional Metro lines in the GDA based on updated forecast demand for travel and on emerging significant changes in land use and spatial policy, including previously considered options to extend Metrolink southwards towards UCD, or along the existing Luas Green Line, or towards South West Dublin.* The Strategy also identifies the potential for longer-term public transport upgrades, including light rail provision, in corridors where demand is anticipated to exceed capacity. In this regard, it is noted that the GDA Strategy includes a Post-2042 Light Rail Network, which identifies a proposed Luas from the city centre by way of Knocklyon to Tallaght, subject to Measure LRT2. Furthermore, in support of high-capacity public transport solutions for Dublin southwest, the South Dublin County Development Plan already contains objective SM3 Objective 7 which states:

A number of submissions detail that the subject lands support a number of existing wildlife and ecosystems, are needed to reduce pollution from the N7 and M50 road networks. Alternative lands should be sought on the outskirts of Dublin along the railway line. A submission was received from the Department of Housing, Local Government and Heritage (NPWS), in relation to the four areas proposed as Future Strategic Long-Term Development Areas (Future SDAs). As per the submission, it is detailed that all the Future SDAs have a significant biodiversity value but does not provide further comment in relation to the subject lands. **Heritage** A submission highlights that the subject lands are in close proximity to Belgard Castle, a protected structure (RPS Ref. 206) and its associated SMR(s) (Ref. R149444). The submission requests that a substantial buffer zone be applied in relation to same and that an archaeological investigation be conducted, prior to works being undertaken. **Surface Water** A submission details that an increase in land-use intensity would have a subsequent effect on drainage impacts. Particularly with regard to the Newlands	*To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin southwest, including examining the feasibility of Metro and / or Luas, serving areas including Ballyboden, Ballycullen / Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure and the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin southwest.* The identification in the submission, of a commitment in the 2025 Programme for Government, to commission an independent feasibility study into continuing MetroLink from city to Southwest Dublin is noted. The inclusion in the GDA Strategy of Measure LRT2 and a post 2042 light rail link promotes the principle of a new light rail link between the city centre and Tallaght by way of Knocklyon. While the submission suggests that this is not strong enough there is also the existing objective in the current County Development Plan and SDCC will continue to engage with the NTA and TII to deliver on public transport infrastructure to meet the needs of the county. Furthermore, as evidence of its commitment SDCC is supporting residents to carry out a socio-economic appraisal of a Metrolink extension through the provision of financial and expert resource. Given the existing strong support in the CDP and SDCCs demonstrated commitment further objectives as part of this variation would only repeat the sentiment of the existing objective and is neither required nor appropriate. The Planning Authority welcomes the NTAs view that the Future Strategic Long-Term Development Areas could potentially align with the principles of transport and land-use integration subject to a

Golf Club, including any subsequent effect upon same via construction activity. **Overdevelopment and Impact on Community and Social Facilities** A submission details that additional housing at the subject lands, would exacerbate childcare provision, afterschool services and result in a rise of antisocial behaviour in the immediate to wider area. Furthermore, several submissions request that any future development on the subject land, has regard to the existing amenity and recreational uses of the immediate and wider area. **Water and Wastewater** A submission was received from Uisce Éireann (UÉ), formerly Irish Water (IW), in relation to the site and the accessibility of services from a UÉ point of view. The following is extracted from the submission in full: *'We have no objections to the proposed material alterations to allow for additional housing growth (including changes to land zoning & residential density ranges). The 9B strategic sewer runs through most of South Dublin with effluent flows terminating at Ringsend Treatment Plant. The 9B sewer is a combined sewer and is constrained. UÉ are currently looking at potential solutions which may include, sewer duplication and storage. In the*	statutory land use plan providing for growth in line with the provision of transport infrastructure and services. The intention of the Future SDA designation is to allow for the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders including the NTA and TII to plan for the release of lands as need arises in the 2030s, to inform rezoning proposals. The observations on Newlands and the interface with the existing transport infrastructure is noted and will be a key consideration as part of the plan-led approach to these lands set out in Policy CS3. An objective within that policy clearly sets out the intent for a statutory process and the need for sustainable transport options as follows: *CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* The benefit that an Area-Based Transport Assessments (ABTA) could bring to the process is noted and considered appropriate to include by way of a further objective under Policy CS3. **CE Recommendation** To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows:

interim, separation of storm water, removal of infiltration, misconnections and SUDs solutions must be looked at.' Furthermore, UÉ specifically provide comments in relation to Amendment Ref. No. 20, Belgard Road: *'Long Term Strategic Water: Significant trunk watermain network bounding the site. Local upgrades required* *Sewer network: Substantial upgrades likely (9B Sewer Upgrade).'* **Utilities** A submission was received from Electricity Supply Board (ESB), with regard to the overall variation, having no site specific objections to the variation, ESB concluded the following: *ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly:*	**CS3 Objective 4** **To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.** **Environment, Biodiversity and Green Infrastructure** The Planning Authority notes concern regarding potential loss of green infrastructure corridors, including the subject lands biodiversity value as stated by the DHLGH (NPWS). In this regard, Policy CS3 outlined above and associated Objectives CS3 1 and 3 within the Variation, ensures that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. *CS3 Objective 1:* *To commence preparatory studies and analysis of the Future SDAs, as identified on the development plan maps, to understand the existing land uses and ecological sensitivities and to inform the preparation of future proposals for rezoning to meet the needs of the County through an holistic approach to plan making. The exact lands to be brought forward as future rezoning may change according to the outcome of these studies.* *CS3 Objective 3:* *To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter*

• *Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the level of operational activities ongoing at our high-voltage substations within South Dublin are protected* • *A collaborative partnership between South Dublin County Council and ESB to proactively identify and secure appropriate sites for the development of essential energy infrastructure will allow both organisations to plan proactively, identify a viable strategic site, and ensure infrastructure keeps pace with the county's long-term growth objectives.* • *ESB respectfully requests that due consideration is given to the need for critical upgrades and capacity enhancements across South Dublin, as these are essential to address current grid constraints, support renewable energy integration, and enable sustainable residential and industrial growth.* • *Ensuring that public utilities are permissible under all zoning objectives is critical to enabling timely, efficient delivery of network capacity upgrades and supporting sustainable local growth and climate goals.* • *Recognising the opportunities for early engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways*	*alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.* Any future development proposal(s) will be brought forward through a comprehensive plan-led process, informed by detailed environmental assessment, including Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and site-specific ecological studies. Furthermore, consultation with the SDCC Heritage Officer will be untaken, as part of any proposed masterplan or subsequent application, whereby appropriate CDP policies will be required to be conformed with. Accordingly, biodiversity and green infrastructure will be carefully considered as part of a plan-led process to the Future SDA ensuring that such features are appropriately protected, integrated and, where possible, enhanced through a robust, plan-led assessment process in line with national, regional and local policy objectives. **Heritage** The proximity of Belgard Castle (RPS Ref. 206) and associated SMR (R149444) is noted. The County Development Plan provides strong policies and objectives regarding the protection of the built, natural and archaeological heritage of the County, in particular Policy NCHB1, NCBH13, and NCBH19.

and the provision of ducting/underground cabling. **Miscellaneous** A submission, with particular regard to the Newlands Golf Club, details that engagement should be encouraged where proposals may materially affect boundary conditions, amenity or operational continuity.	Furthermore, Policy CS3: Future Long-Term Development Areas and its associated objectives (CS3 Objective 1, outlined above), requires that detailed studies and analysis are undertaken to understand existing land uses and sensitivities, to inform any future consideration of rezoning through a plan-led approach. Any future development proposal(s) on the subject lands, shall have regard to the aforementioned CDP policy and objectives, including referral to the SDCC Conservation Officer for assessment as part of the plan-led process, whereby relevant CDP policies will be required to be conformed with. **Surface Water** While concerns raised regarding surface water management and potential knock effects are acknowledged, the Planning Authority is satisfied that the County Development Plan contains robust policy and objectives, together with Strategic Flood Risk Assessment (SFRA) and SDCCs SuDS Guidance, to ensure that surface water matters are appropriately addressed. It is emphasised that the identification of the lands as a Future SDA does not give rise to any immediate development. Rather, it establishes a framework in which future development, will be subject to a comprehensive plan-led approach under Policy CS3. Development cannot proceed without clear demonstration that surface water and flood risk issues have been fully assessed and mitigated in a manner that protects existing and future users, safeguards amenity and mitigates residual adverse impacts.

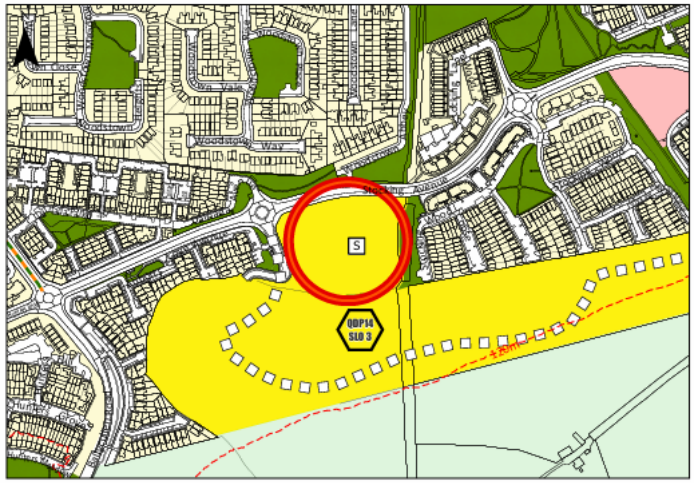
	Issues pertaining to construction activity and management of same, as set out in the CDP, are addressed through the development management and enforcement processes rather than through proposed designations as SDAs to the CDP. **Overdevelopment and Impact on Community and Social Facilities** Concerns relating to the potential impact of additional housing development on childcare provision, community services and local amenity are noted, including references to capacity pressures and potential social impacts. The CDP provides a clear policy framework to ensure that residential development is supported by appropriate social and community infrastructure, including childcare facilities, educational provision, open space, and recreational amenities. CS3 Objective 3, outlined above and included in the proposed Variation for SDAs requires that any future planning framework addresses social infrastructure requirements and ensures that development is phased in line with the delivery of supporting services and facilities. Accordingly, it is considered that the concerns raised can be appropriately addressed through the plan-led process, where the need to provide new and/or enhanced community infrastructure as part of any future development will be examined, and does not preclude the identification of the lands. **Water and Wastewater** The CDP recognises the importance of aligning development with the provision of adequate water services infrastructure and supports the ongoing delivery of upgrades to accommodate projected growth.

	It is emphasised that the identification of the lands as a Future SDA does not result in any immediate demand on water or wastewater infrastructure. Rather, it provides a framework within which infrastructure requirements can be identified, assessed and delivered in a coordinated manner. Policy CS3 requires that any future development proposals are subject to detailed infrastructure assessment and are contingent on the availability of sufficient capacity, including engagement with UÉ to ensure alignment with infrastructure delivery. UÉ have indicated the following in relation to Amendment Ref. No. 20: *'Long Term Strategic Water: Significant trunk watermain network bounding the site. Local upgrades required* *Sewer network: Substantial upgrades likely (9B Sewer Upgrade).'* While infrastructure constraints are acknowledged, it is considered that these items will inform the timing and phasing of any future development and do not represent a barrier to the long-term identification of the lands. **Utilities** The submission received from ESB, with regard to the overall variation, is noted. SDCC is currently engaging, and will continue to engage, with both EirGrid and ESB to support the wider upgrade requirements of the electricity network. In relation to individual sites, connections to the

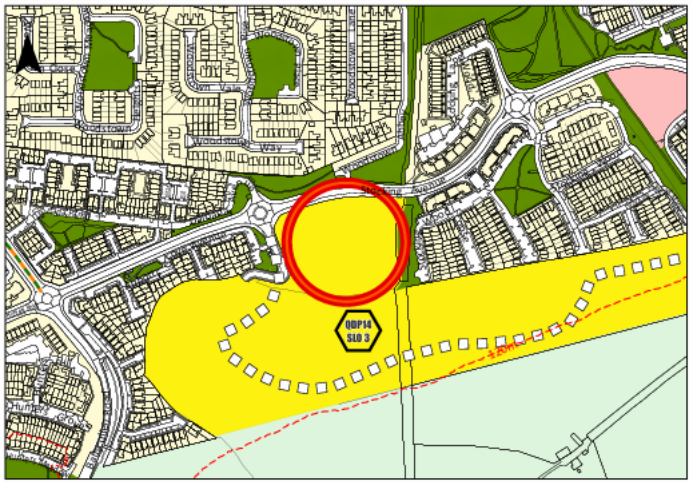
	network must be agreed with ESB by the developer as part of new development proposals. In relation to other utilities, including electricity, broadband and telecommunications, it is noted that such services are typically delivered or upgraded as part of the construction and occupation of new development. Future development proposals will be required to demonstrate that comprehensive utility servicing can be provided in a resilient and sustainable manner and that development does not proceed in advance of essential services being put in place. **Miscellaneous** Any future development proposals will be advanced through a plan-led framework under Policy CS3, which will include stakeholder engagement and consultation at the appropriate stages. Issues pertaining to boundary treatment and amenity, can be examined as part of the detailed analysis of the lands and as set out in the CDP, can be further addressed through the development management and enforcement processes where required. **Conclusion** Having regard to the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) request that planning authorities consider the long-term housing needs of the County for the remaining period of the current adopted plan and the lifespan of the new 10-year development plan, to the need to give clear strategic direction to future development locations under the next 10-year County Development Plan to enable the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of such lands as the need arises in the

	2030s, and to the location of the proposed SDA within the Dublin City and Suburbs settlement area, it is considered that the identification of lands at Belgard Road as a Future SDA is appropriate, subject to further detailed analysis of the lands as set out in CS3 Objective 1.
CE Recommendation To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows: **CS3 Objective 4** **To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.**	

AMENDMENT NO. 21 – STOCKING AVENUE, BALLYCULLEN (School Reservation)



Existing



Proposed

Submission No.

SD-C401-CDP25-657 – Tom Phillips + Associates

SD-C401-CDP25-787 – Fionnuala Hogan

SD-C401-CDP25-788 – AOIFE MURPHY

SD-C401-CDP25-795 – DEREK CLUSKEY

SD-C401-CDP25-807 – Yvonne Tighe

SD-C401-CDP25-811 – Ahson Pasha

SD-C401-CDP25-835 – Michelle Staunton Staunton

SD-C401-CDP25-854 – Vee Dee

SD-C401-CDP25-857 – Iain Briscoe

SD-C401-CDP25-874 – EUGENE BARRETT

SD-C401-CDP25-877 – Irish Water

SD-C401-CDP25-893 – Fiona Young

SD-C401-CDP25-896 – David Young	SD-C401-CDP25-902 – Megan McMenamin	SD-C401-CDP25-905 – Neil Coogan
SD-C401-CDP25-908 – Lisa O'Connor	SD-C401-CDP25-913 – Aidan Duignan	SD-C401-CDP25-914 – Denise De Luca
SD-C401-CDP25-923 – Eugenia Guspi	SD-C401-CDP25-926 – Emily Bradly	SD-C401-CDP25-929 – Aoife Fox
SD-C401-CDP25-933 – Ewa Urbanska	SD-C401-CDP25-944 – Michelle Kearney	SD-C401-CDP25-945 – Michelle Kearney
SD-C401-CDP25-948 – Philippa Bourke	SD-C401-CDP25-952 – Caryn Su Li Ooi	SD-C401-CDP25-953 – Mariana Calderon
SD-C401-CDP25-964 – Andrea Marschall	SD-C401-CDP25-1009 – Diego Viegas	SD-C401-CDP25-1028 – Sally Sheerin
SD-C401-CDP25-1166 – Kevin Hamilton	SD-C401-CDP25-1191 – Deirdre O'Neill	SD-C401-CDP25-1232 – Karen Gleeson
SD-C401-CDP25-1289 – Niamh MacMenamin MacMenamin	SD-C401-CDP25-1308 – Amanda Sadlier	SD-C401-CDP25-1386 – Deirdre Cooper
SD-C401-CDP25-1429 – John Bird	SD-C401-CDP25-1496 – Aisling Quinn	SD-C401-CDP25-1498 – sailesh kumar
SD-C401-CDP25-1500 – B. C.	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1531 – John Lahart TD
SD-C401-CDP25-1545 – Fiona Hyland	SD-C401-CDP25-1549 – David Sadlier	SD-C401-CDP25-1573 – Josna Lisbeth
SD-C401-CDP25-1574 – Ciarán Ahern TD	SD-C401-CDP25-1645 – Clare Hamilton	SD-C401-CDP25-1664 – Knocklyon Network

SD-C401-CDP25-1720 – Cathy Medbury	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG

Summary	CE Response
The majority of the submissions received object to the removal of the school site objective and request that it be maintained. A minority of submissions support this objective, one being the landowner. **Schools** Submissions object to the removal of the school site. It is submitted that there is a lack of a Social Infrastructure Audit to prove the school site is no longer necessary. It is submitted that the loss of the school site would represent a missed opportunity to support a sustainable, family-oriented community. Schools are identified as core social infrastructure, essential for long-term community stability. Submissions highlight the area is already saturated with housing and there is a serious lack of schools to meet the current needs of residents. Areas designated as recreational (Cherryfield) and as schools (Stocking Lane) shouldn't be re-zoned as housing, it is submitted.	Amendment No. 21 is to remove the school objective on RES-N zoned lands to enable the delivery of housing on the lands. **Schools** It is noted that the majority of the submissions received oppose the removal of the school site objective with very few supporting. The reasons provided primarily relate to a lack of schools in the area, shortage of school places, children having to leave the area to access school places, car trips generated by this, and the importance of providing schools and other community and social infrastructure in close proximity to housing in order to build sustainable communities. **Context** The Ballycullen-Oldcourt LAP (BOLAP) was adopted in May 2014. In 2019, SDCC extended the LAP up to June 2024 under Section 12 of the Planning and Development Act 2000 (as amended). The BOLAP expired in September 2024.

Submissions highlight school place shortage in the area.

Submission highlights how children have to leave the catchment area to access school places as there is a shortage.

It is submitted that the provision of a school in this area would mean that children would not have to travel to Firhouse or Knocklyon to get to schools. Safety and security issues raised in this regard as children begin to socialise on their own.

Having a local school will allow for a community to develop, create employment and bring more business to the area leading to more facilities being developed, it is asserted.

Lands at Stocking Lane, Ballycullen has been zoned for a much needed school for years.

Stocking Avenue, Ballycullen, needs more schools it is submitted.

It is submitted that local primary schools are oversubscribed with strict catchment areas, preventing many local children from attending nearby schools with some being delayed starting school or traveling outside their community.

Image from the Ballycullen-Oldcourt LAP (BOLAP) Plan Area (Red)

In terms of schools, the BOLAP made provision for 2 no. school sites. Taking the Ballycullen Road as the centre, the sites are separated into east and west. The LAP outlines that the site to the east is for a primary school, while a site to the west is a primary / post-primary school site. This text is all subject to the school needs identified by the DES at that time.

Since 2014, 2 no. primary schools have been delivered within the wider area, both of which are located outside the LAP boundary. These schools were not identified within the LAP document but were included in the 2016-2022 County Development Plan. These new primary schools are Gaelscoil na Guise and Firhouse Educate Together, both of which are located on Killininny Road. The Holy Rosary Primary School is also located outside the BOLAP boundary.

Within the BOLAP lands, permission was granted in 2022 for a temporary school building to accommodate the Firhouse Educate

Removing the School zoning would be short-sighted unless it was being replaced with zoning that added some other amenity that is lacking Submission highlight a lack of school places in Knocklyon Area. School zoning at Ballycullen should only be removed if the Department of Education and Youth confirm it is no longer needed, it is submitted. Calls for community or education-related compensation if school-zoned land is lost. Submission made by TD Ciaran Aherne indicates that in September 2025, the Minister for Education confirmed in a response to a parliamentary question that site on Stocking Avenue is to cater for the future needs of the Ballycullen/Oldcourt area where there is further significant proposed residential development, and the Department regards this site as vital to meet the future needs of the area and it is readily deliverable to meet a school need in terms of location, access and services. It is also submitted that the Minister stated that 'the requirement to establish a new school at Stocking Avenue is currently under review following the recent grant of planning permission for large residential developments in the area and planning activity on residentially zoned lands that remain undeveloped'. It is further noted that that the Minister indicated	Together Post Primary school on Oldcourt Road. Firhouse ETSS is currently in this temporary accommodation. A Major Project to provide a new permanent school for Firhouse Educate Together Secondary School on Oldcourt Rd, Ballycullen, Firhouse, received planning permission in 2024 and this project is currently at Stage 3 (Tender Stage). **Department of Education and Youth** It is noted that the Department of Education and Youth note with concern the removal of the school objective from the site at Stocking Avenue. The Department state the following: *In relation to other aspects of the draft plan, the department notes with concern the removal of the school objective from the site at Stocking Avenue as per proposed Amendment Ref no 21 in the Book of maps for this variation. This site is centrally located within a substantial residential area that currently has no primary school infrastructure. This area is bounded by the M50 motorway to the east, the R113 regional road to the north, and Ballycragh Park approximately 1 km to the west. At the time of the 2022 Census, this area contained approximately 3,400 households and was home to over 11,000 residents. Residential construction activity in this area has been limited in recent years, with fewer than 500 dwellings completed since 2016, the vast majority delivered between 2016 and 2022. Current demographic data indicates a population of approximately 1,200 primary school-aged children in the area. Of these, 44% attend schools in the wider Firhouse/Oldbawn area, while a further 50% attend schools in the Rathfarnham area. To date, the level of new residential development in the Firhouse area has not generated sufficient additional demand to justify the establishment of a new school at Stocking Avenue. However, recent residential planning activity has the potential to significantly alter the demographic*

that the department would continue to liaise with SDCC in relation to school needs in the Ballycullen, Firhouse and Oldcourt Areas. The removal of the school objective at Stocking Avenue prioritises residential development over educational infrastructure provision and may increase pressure on existing schools in the area, it is submitted. It is submitted that this approach may undermine existing Development Plan objectives, including COS4 SLO 2, which seeks to promote additional indoor sports and community infrastructure for the growing Knocklyon–Ballyboden population. It is requested that the school objective is retained as its removal would remove safeguarded social infrastructure in an area already experiencing significant residential pressure. It is stated that there is an ongoing need for educational infrastructure in this wider catchment and that the planning authority is increasing residential opportunity while at the same time removing a reserved school objective without identifying a replacement school site or demonstrating how educational demand will be met within this part of the county. It is suggested that this is contrary to balanced, sustainable community planning and that the long-term provision of schools,	*profile of both the immediate locality and the wider Firhouse and Rathfarnham areas. These plans could result in the construction of more than 600 new dwellings in proximity to Stocking Avenue, generating an estimated additional demand for 200-210 primary school places. Furthermore, residential developments comprising more than 750 units are planned for lands near Holy Rosary Primary School. These developments could generate demand for a further 250-260 primary school places. Holy Rosary Primary School currently serves the residential area surrounding Stocking Avenue, and its capacity will be required to accommodate children from these new developments, thereby increasing pressure for additional school provision in the Stocking Avenue area.* *School provision can only be planned and delivered when demand has materialised, and available capacity in existing schools is typically utilised first. Nonetheless, it is essential that development plans retain provision for community facilities, including schools, for the full duration of the plan period to ensure such facilities have the opportunity to be delivered once the planned population emerges. Community facilities should be embedded within and support the development of sustainable communities. The department recognises the importance of facilitating residential development, and accordingly, the amount of land reserved for school use need not be excessive. In urban environments, the department has successfully delivered 24-classroom primary schools on sites as small as 2 acres when integrated into a wider residential masterplan. The department therefore requests that the school objective at Stocking Avenue be retained and amended to state:* *".. .for the provision of a school facility to serve the area. The design of the school should form part of a wider masterplan of the lands, subject*

community facilities and recreational amenities is a critical component of sustainable settlement planning and should be considered alongside housing growth within a coordinated planning framework. Submission acknowledges the national need for housing but sustainable development for local communities is required to support it. Submissions highlight the large number of new builds in the Ballycullen/ Stocking Avenue/ Edmonstown area such as Dodderbrook, Ballycullen Gate, Ballycullen Green, as well as houses under construction or planned, and the serious lack of schools to meet existing and future demands for the growing local community. It is submitted that this goes against the NPF's emphasis on sustainable and balanced growth. Submissions highlight pressure on schools and infrastructure as is, and adding more housing will intensify the pressure. It is submitted that removing a designated school site in favour of further housing is unsustainable and will exacerbate existing traffic congestion by forcing more school run car trips. It is submitted that residential development in the area has progressed far ahead of social	*to the approval of the Department of Education and Youth. No development shall take place on the land until the masterplan is agreed with the Planning Authority and the Department of Education and Youth."* It is recognised that the Department is seeking to facilitate some residential development on the lands while retaining the school reservation. However, the site is approximately 1.7 hectares (4.2 acres), allowing for a buffer from the existing treeline to east and south. While an urban school model could be considered subject to meeting the necessary requirements, it would have to be demonstrated that the lands could accommodate both housing and a school. Should this be a possibility, and meet relevant standards for both, it is considered that there is merit in a new SLO attached to the school site as follows: *To provide for a school on these lands to the south of Stocking Avenue and to the west of the treeline located west of Stocking Wood Copse. Provision may also be made for residential development in conjunction with the school, subject to a masterplan to be agreed by the Planning Authority in consultation with the Department of Education and Youth. Notwithstanding the masterplan requirement, any planning application for a school on the subject lands shall be considered on its own merits.* **Housing Supply** With regard to the wider Neighbourhood Area of Templeogue / Walkinstown / Rathfarnham / Firhouse (which includes the former Ballycullen-Oldcourt LAP lands) it is noted that SDCC's Housing Supply Monitor (HSM)– which has been updated to show Q1 2026 data – indicates the following:

infrastructure delivery. Rezoning the school site would exacerbate an already evident infrastructure deficit. Established schools are a drive away and the weather means cycling cannot be solely relied on, especially along the old Scholarstown Road. **Department of Education and Youth** The Department notes with concern the removal of the school objective from the site at Stocking Avenue. This site is centrally located within a substantial residential area that currently has no primary school infrastructure. **Community and Social Infrastructure** Submission acknowledges the national need for housing but sustainable development for local communities is required to support it. Submissions highlight a lack of investment in community and social facilities. It is submitted that provisions are not being made for more schools, libraries, community centres, a community swimming pool, petrol stations, pharmacies, cafes, playgrounds, pubs, restaurants, road widening, public transport and so on. Only houses being provided, it is asserted, which has outpaced delivery of community infrastructure.	<table><tr><th>Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area</th><th>No. of Homes</th></tr><tr><td>Completed*</td><td>952</td></tr><tr><td>Supply Pipeline (Permitted/Under Construction)</td><td>1,995</td></tr></table> *Since the adoption of the CDP in Q3 2022 In the western side of the BOLAP lands, LRD24A/0007 for approximately 522 new homes at Ballycullen Gate, Oldcourt is currently under construction. In the eastern side of the BOLAP lands, and to the south of the lands containing the school site objective, it is noted that approximately 494 new homes and a creche were permitted under LRD25A/0003W (ACP-323859-25) by An Coimisiún Pleanála on the 9th March 2026, while Variation No. 2 was on public display. Having regard to concerns raised in the submissions received regarding the proposed omission of the school site objective from this site, including by the Department of Education and Youth, and noting the recent planning and construction activity within the BOLAP lands and the wider Neighbourhood Area of Templeogue / Walkinstown / Rathfarnham / Firhouse (which includes the BOLAP lands) the Planning Authority is of the view that the school site objective on these lands should be retained. **Traffic, Roads and Public Transport** Submissions raise concerns regarding how, without a local school in the area, children have to travel longer distances to access education, making it harder to walk or cycle to school. Concerns are all raised regarding the lack public transport services.

It is submitted that the loss of the school site would represent a missed opportunity to support a sustainable, family□oriented community. Schools are identified as core social infrastructure, essential for long□term community stability. Submission highlights that a local school here would function as a community hub, strengthening social connections and neighbourhood cohesion. The area requires more facilities and less housing, it is asserted. It is submitted that if you can't or don't play GAA there are no other amenities. It is submitted that the delivery of 'soft' infrastructure such as community hubs, recreational spaces, and childcare facilities has not kept pace, leading to a 'dormitory' effect, where residents must travel elsewhere for basic community engagement. The council should build a liveable and sustainable environment, it is asserted. It is submitted that local amenities have not been provided for in new residential development in the Ballycullen area over the years, notwithstanding the 3 local centre zonings in the area. Reference is made to EDE14 Objective 1: 'To support the development and enhancement of local centres as sustainable, multifaceted, retail led mixed use centres, enhancing local access to daily retail needs, which do not	The Council note that the NTA indicate that one of the lowest priority sites, from a transport accessibility point of view is located at Stocking Avenue. The lands at Stocking Avenue are identified in the adopted County Development Plan as a school site. The proposed Variation has indicated the removal of the school objective for the site, retaining the underlying residential zoning which has been in place since 1998. It is noted that the intention of a school site at this location in the original Area Action Plan in 2001 was to have it 'central to the area to be served so as to discourage excessive transport of children to school by private car'. The Department of Education and Youth's observations on the site are noted in this regard. As a site for residential use, it would be located within a wider residential development area, a significant percentage of which has been delivered through the now expired Ballycullen-Oldcourt Local Area Plan, with the remaining zoned lands either subject to future permissions or with more recent permissions yet to commence or complete. the NTAs observations on accessibility are noted, it is considered that the site is within an area which has grown as part of long planned development and which will, as demand grows, require to be serviced by improved transport accessibility. Having regard to the accessibility issues, and the growth in population, which is ongoing notwithstanding that the LAP has expired, it is considered appropriate that the school site objective is retained in its current central location. **Community and Social Infrastructure**

adversely impact on or draw trade from higher order retail centres'. It is submitted that the LC (Local Centre) provided at Woodstown provides a good range of services. The other two being solely retail foodstores, with Lidl and Tesco occupying the sites respectively, which do not meet the requirements of EDE14 Objective 1, it is submitted. Requests for an objective to provide a small range of retail and commercial units comprising 2 retail/commercial units (c. 150sqm), and a café/restaurant (c. 300sqm) with potential for a leisure/gym use above to improve amenity in the area. Local clubs such as Ballyboden GAA Club and Knocklyon United are at capacity already, it is submitted. Calls for the Council to purchase Orlagh House to use as a gateway to the mountains and local park, community centre and pitches. Calls for consultation with the community to see what they want their area to look like. **Traffic, Roads and Public Transport** NTA submit that from a transport accessibility point of view Stocking Avenue (Amendment No. 21) is one of the lowest priority sites. It is submitted that this is a very poorly linked area for Dublin and questions whether it can support	Submissions raise concerns regarding a lack of community and social infrastructure generally to meet the demands of the growing population in this area. However, it is considered that comments relating to community and social infrastructure generally, while noted, cannot be addressed under Amendment No. 21 which relates specifically to the school site objective. **Other** Similarly, it is considered that other comments, while noted, cannot be addressed under Amendment No. 21 which relates specifically to the school site objective. **Water and Wastewater** It is noted that Uisce Éireann indicate that Amendment No. 21 Ballycullen is feasible in terms of water supply and wastewater services. **Conclusion** Having regard to the level of concerns raised in the submissions on the proposed omission of the school site objective from this site, and the reasoning set out in them, and to the submission from the Department of Education and Youth, and having regard to the recent planning and construction activity, including the current status of the two significant land parcels to the east and west of the current school site objective – with 522 homes approximately to west under construction and planning permission granted for a further 494 to the east (south of school site), it is considered, on balance, that the school site objective at this location should be retained to meet the anticipated school place requirements based on projected growth.

more people. Traffic and services cannot cope with the amount of people already, it is asserted, and the roads are already at capacity and traffic congestion is bad. It is submitted that roads have been made narrower for cycle lanes, which are rarely used. It is submitted that the level of development in the Ballycullen / Stocking Avenue area has reached limits of what is tolerable in terms of traffic, depletion of open space, and impact on livelihood. Submissions highlight retaining a local school would enable walking and cycling to school, encouraging healthier travel habits. Supports national and local objectives to promote active travel and reduce car dependency. Submissions highlight a lack of bike lanes serving this area and kids cannot walk to the park. It is submitted that cycling is one prong in a healthy transportation system. Submission highlights that shorter school journeys would reduce traffic-related emissions and environmental impacts.	However, having regard to the amendment suggested by the Department of Education and Youth, and the need for housing to be supported by the necessary infrastructure, it is recommended that a new SLO be placed on the lands which will ensure the retention of the school site but in addition offer some potential for limited housing subject to an agreed masterplan. **See CE Recommendation below**

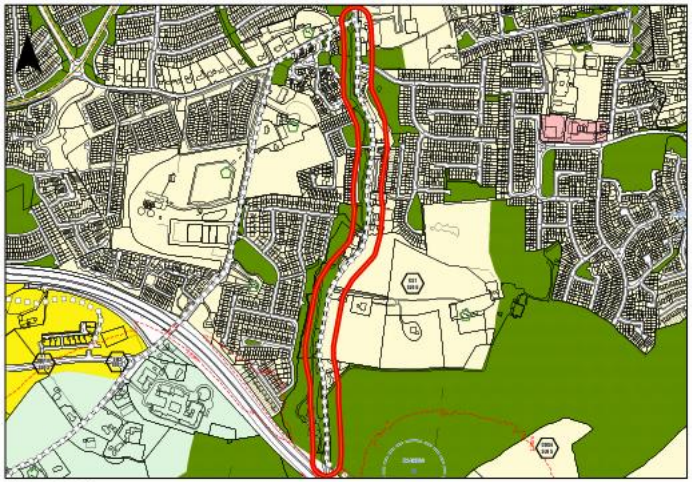
It is submitted that public transport is unreliable in this area and does not provide connection to workplaces. Submissions highlight that there seems to be no plan regarding transport relief in the area and that traffic and public transport are major concerns because there is limited bus routes, and that adding more housing will require major improvements. Knocklyon is one of the worst serviced areas in Dublin for public transport it is submitted with the 15 bus being one of the most cancelled buses and the F1 has increased journey times in to the city centre. Average travel times in Knocklyon are far worse than Dublin averages making it not an attractive alternative, it is asserted. It is submitted that roads have been made narrower for cycle lanes, which are rarely used. Submissions highlight that most parents have to drive their children to primary and secondary school as they are too far away and that the removal of the school site will cause even high levels of traffic congestion. A local school on this site would help reduce unnecessary travel and ease traffic pressure, it is asserted. Concerns raised regarding the increase in traffic and lack of safe road crossings is a serious concern.	

Adding more houses without proper infrastructure in place will cause major problems, it is submitted. The Scholarstown Roundabout being one lane is still one of the worst ideas so far by SDCC, which causes so much traffic, it is suggested. It is submitted that the local road network is already under severe pressure, particularly during peak commuting and school hours and additional residential development without new schools will increase traffic as families travel further afield for education. It is submitted that the infrastructure surrounding White Pines and the nearby estates is already under pressure. Removing the school site reduces the potential to calm traffic through use of a 'school zone'. **Other** Submission advocates an infrastructure-first approach to development. Further zoning and intensification should only proceed when transport capacity, Schools, Healthcare, Community and recreational facilities, Water and drainage infrastructure are planned and deliverable and this should be taken into account when deciding on any potential rezoning for additional housing.	

It is submitted that the site currently provides a necessary break in the built environment and increased density will put further pressure on local green spaces and biodiversity. **Water Supply and Wastewater** UÉ indicate that Amendment No. 21 Ballycullen is feasible in terms of water supply and wastewater services.	
CE Recommendation To amend the proposed Variation and Amendment 21 to include a new Specific Local Objective on the lands as follows: **COS8 SLO2** ***To provide for a school on these lands to the south of Stocking Avenue and to the west of the treeline located west of Stocking Wood Copse. Provision may also be made for residential development in conjunction with the school, subject to a masterplan to be agreed by the Planning Authority in consultation with the Department of Education and Youth. Notwithstanding the masterplan requirement, any planning application for a school on the subject lands shall be considered on its own merits.***	

AMENDMENT NO. 22 - WHITECHURCH-EDMONDSTOWN (Edmondstown Road Upgrade)

Existing



Proposed

Submission No.

SD-C401-CDP25-1041 – Transport Infrastructure Ireland

SD-C401-CDP25-1513 – National Transport Authority

SD-C401-CDP25-1552 – John Spain Associates

SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG

Summary	CE Response
The main issues raised relate to roads and traffic issues. Submissions also highlight environmental assessment issues and raise concerns regarding the impact on the riparian corridor and the rural landscape character. It is noted that submissions	**Overview** Amendment No. 22 Whitechurch-Edmondstown consists of the addition of a new roads objective to Table 7.5 Six Year Road Programme as follows:

were received from the Ballyboden Tidy Towns group and Transport Infrastructure Ireland (TII).

Roads – TII
TII identifies potential interaction of proposed Amendments No. 22 and No. 23 which occur at a location where the M50 motorway is subject to management under PPP Concession and TII Structures exist.

TII highlights that proposed Amendment No. 22 as indicated in proposed variation mapping extends along the Edmondstown Road to the M50 and travels under the M50 and therefore the M50 above is an overbridge which is a TII Structure (Eirspan Structure Name: Edmondstown Bridge South, Eirspan Structure ID: IC-M50-016.01).

TII indicate that any proposals in proximity to or within PPP managed areas require prior consultation with TII and demonstrated of compliance with all relevant TII Publications (Standards & Technical) requirements and notes that TII Publications are available at the dedicated website www.tiipublications.ie.

It is submitted by TII that development proposals which impact TII Structures must be subject to co-ordination with, and the prior approval of, TII including the undertaking of the procedure under TII Publication DN-STR-03001 - Technical Acceptance

Road	Description	Function
Edmondstown Road Upgrade	Upgrade of existing road	To enhance pedestrian, cycling and public transport facilities and access to new residential lands.

Other related amendments proposed under Variation No. 2 in this area are Amendment No. 7 to rezone lands off Edmondstown Road from 'RU' to 'RES' together with Specific Local Objective CS7 SLO6, and Amendment No. 23 for a new road connecting Whitechurch Road and Edmondstown Road to provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment is to be incorporated into a masterplan-led design approach to development of the residential lands.

Also located within the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area are Amendment No. 12 to rezone lands at Cherryfield Way from 'HA-DV' to 'RES' and Amendment No. 21 consisting of the proposed removal of the designation school site at Stocking Avenue. These proposed Variation lands are responded to in this CE Report separately but are included here insofar as it is necessary to address the issues raised as part of this amendment.

Roads – TII
The Planning Authority notes TII comments that it recommends implementation of new Objectives (Transportation) for the 6 year roads programme – namely Amendment No. 22 and Amendment No. 23 at

of Road Structures on Motorways and Other National Roads. This Standard specifies the procedures to be followed in order to obtain Technical Acceptance for structures on motorway and other national road schemes and for the submission of as built records with an overview of the various procedures and requirements provided. TII recommends implementation of New Specific Objectives (Transportation) for New 6 year roads objectives have regard to the presence and extent of the M50 and associated infrastructure, inducing compliance with TII Publications and advanced implementation consultation with TII to ensure avoidance of the M50, in the interests of maintaining the safe and efficient operation of the national roads network in accordance with official national road policy and public safety. **Upgrade Function Description** John Spain on behalf of D/RES Properties supports the Alteration No. 23 which provides for the Whitechurch Road and Edmondstown Road connection. They request altered wording to Amendment No. 22 as the company owns lands on the east side of the Edmondstown Road, west of the Whitechurch Road and south east of the Edmondstown Golf club. It is submitted that given that this road objective relates to a significant portion of the Edmondstown	Whitechurch Edmondstown – having regard to the presence and extent of the M50 and associated infrastructure, and subject to compliance with TII Publications and advanced implementation consultation with TII. The Planning Authority note TII's comments that proposed Amendments No. 22 and No. 23 interact at a location where the M50 motorway is subject to management under PPP Concession and TII Structures exist. The Planning Authority notes from TII's submission that Edmondstown Road travels under the M50, and that the overbridge is a TII Structure. The Planning Authority will continue to engage with TII in respect to any proposals in proximity to or within PPP managed areas. It is also noted that demonstrated compliance with all relevant TII Publications (Standards & Technical) will be required on any such projects. It is further noted that development proposals which impact TII Structures must be subject to co-ordination with, and the prior approval of, TII including the undertaking of the procedure under TII Publication DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads. TII's role under the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) is acknowledged as is the importance of protecting the strategic function of the national road network, including the TEN-T Core and Comprehensive Networks. The Development Plan already includes a suite of objectives requiring that development proposals adjacent to or affecting national roads: • Demonstrate that the operation, safety and capacity of the national road network are not compromised

Road with a number of different land ownerships and existing properties, the wording of the objective be amended as follows to make it clear that the delivery of residential development on the substantial residential zoned sites along the road will not be dependent on delivering these upgrades: 'Edmondstown Road Upgrade: SDCC to implement measures to enhance / improve pedestrian, cycling and public transport facilities and access to new and existing residential lands.' It is submitted that the description in the Variation does not represent the intention of the Planning Authority and this should be apparent to the general public when such proposals come forward for development, to ensure third parties do not raise concerns in relation to prematurity pending such upgrades, which would delay much needed housing delivery. In addition, the submission notes that their client's lands are subject to a Strategic Road Network - SM4 SLO 1. The Transport Needs Assessment and the Traffic and Transport Assessment, which will be required to accompany the future planning application for residential development on the lands, will help establish if any upgrades are required on Edmondstown Road to facilitate the development of the subject lands.	• Avoid direct access onto national roads • Address noise, air quality, lighting and drainage impacts through appropriate mitigation These objectives apply equally to rezonings and to subsequent planning applications and masterplans. The Planning Authority will continue to actively engage with TII and other relevant agencies including the National Transport Authority (NTA) in relation to strategic and local transportation issues including delivery of transport projects and to encourage consultation with local communities as per SM1 Objective 7 of the County Development Plan. **Traffic, Roads and Public Transport** The request on behalf of D/RES Properties to amend the wording of the 6 Year Road Objective to provide clarity for the Edmondstown Road Upgrade is noted. The objective for Amendment 22, the Edmondstown Road upgrade currently states: 'New 6 year roads objective (Table 7.5 of CDP) for upgrade of Edmondstown Road to enhance pedestrian, cycling and public transport facilities and provide access to new residential areas.' This is reflected in the amendments to Table 7.5 Six Year Road Programme in the Written Statement as follows: **Road** | **Description** | **Function**

Traffic, Roads and Public Transport
The NTA has indicated that Edmondstown Road is one of the lowest priority sites, from a transport accessibility point of view.

Submission highlights that the proposal to upgrade Edmondstown Road and to connect Edmondstown road to Whitechurch road appears to facilitate development of surrounding lands rather than resolve existing transport constraints.

It is submitted that the road network in the wider area (termed 'the corridor') already experiences congestion at key junctions including the roundabouts at Ballyboden, Scholarstown and Orlagh. Additional traffic pressures also come from permitted but unbuilt residential developments in the area and the Hellfire Club tourism development expected to attract approximately 300,000 visitors annually (the figure of 30,000 is also mentioned).

Concern is raised that SDCC is undergoing public consultation on the Knocklyon–Ballyboden Active and Sustainable Travel Scheme, with the scheme being related to roads in the same corridor and having the same submission deadline as the Variation.

It is indicated that Ballyboden Tidy Towns have also made a submission to the Knocklyon–Ballyboden Active and Sustainable Travel Scheme consultation

Edmondstown Road Upgrade	Upgrade of existing road	To enhance pedestrian, cycling and public transport facilities and access to new residential lands.

To address the concerns raised and to ensure that it is clear that the function of the upgrade is to facilitate new and existing zoned lands, the following is recommended by the Chief Executive by way of amendment to the wording of the 'Function' element of Table 7.5:

To enhance pedestrian, cycling and public transport facilities and access to new**ly developed** residential lands.

Submissions raise concerns regarding existing transport constraints and traffic congestion. It is also submitted that the combined effects of road capacity changes, growth arising from the proposed variation and additional development have not been evaluated through integrated transport modelling.

South Dublin County Planning Authority is responsible for the management of the regional and local road network. The Planning Authority's proposals for the short and medium to long term development of the regional road network are outlined in Table 7.5 Six Year Road Programme and Table 7.6 Medium to Long Term Road Objectives and are subject to consultation with TII.

The NTA has indicated that Edmondstown Road is one of the lowest priority sites, from a transport accessibility point of view. The lack of access to public transport for the proposed rezoning along the

also relating to this area. This scheme proposes reducing carriageway widths, traffic calming measures and new cycle and bus infrastructure along the same corridor. It is stated that while the Ballyboden Tidy Towns supports sustainable transport improvements, the combined effects of road capacity changes, growth arising from the proposed variation and additional development have not been evaluated through integrated transport modelling.

It is requested that the Whitechurch-Edmondstown road connection is removed and that the urbanising or widening of the Edmondstown Road is avoided.

It is submitted that there is no integrated corridor level transport analysis demonstrating how Amendments No. 22 and No. 23 would interact with existing congestion at the Ballyboden, Scholarstown and Orlagh roundabout or improve the constraints. In the absence of further analysis, the submission indicates that the road objectives are premature and unsound.

It is submitted that the road network should be considered within the context of a coordinated planning framework for the wider corridor, including the Ballyboden Local Area Plan, rather than being introduced through a focused Development Plan variation.

Edmondstown Road (Amendment no. 7) and for the existing zoned lands at Whitechurch-Edmondstown is recognised. It is in this context that the Planning Authority is seeking to overcome the transport issues by way of amendments 22 and 23 which would both assist in unlocking the long-time zoned land immediately south of the M50 and facilitate the rezoning of the Edmondstown Road lands.

Amendment No. 23 is for a connecting road between Whitechurch Road to the east and Edmondstown Road to the west to facilitate the release of zoned lands at this location. The amendment includes a specific objective to insert the following into Table 7.5 of the Written Statement:

Road	**Description**	**Function**
Link between Edmondstown Road and Whitechurch Road	New road / street and associated junction upgrades connecting Edmondstown Road and Whitechurch Road.	To provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands.

Having regard to both proposed Amendments in the Variation to Table 7.5 involving upgraded and new road connections, it is considered that while public transport is currently unavailable, it will be feasible once the necessary road infrastructure is undertaken. The Planning Authority

Rural Landscape Submission highlights that improvements to sustainable transport infrastructure are supported, however, the amendment is objected to as the existing Edmondstown Road is a long established scenic rural road with historical, landscape and residential amenity value. To widen it would alter its character fundamentally. It is stated that it would increase development pressure and require removal of historic hedgerows and boundaries that the variation's environmental documents identify as important features. **Owendoher Linear Park** It is submitted that the proposals to widen or urbanise Edmondstown Road could potentially affect sections of the Owendoher Linear Park corridor and walkway and adjacent riparian landscape. It is submitted that the Owendoher Linear Park was established as a specific planning objective to protect and enhance the river corridor in response to development pressure within the area. Given the environmental and recreational value of the corridor alongside its associated riparian habitats, its long-term protection should remain an important planning consideration, it is asserted. **Environmental Assessment** Reference is made to environmental screening for the scheme. It is requested that a cumulative	will engage further with the NTA to facilitate appropriate public transport connections to the lands. To ensure the appropriate phasing in line with the need for public transport the CE recommendation for Amendment no. 7 Edmondstown Road rezoning has amended the proposed SLO to include for phased delivery in line with road upgrades required for the delivery of public transport. In addition, in relation to Amendment no. 23 (Edmondstown Road - Whitechurch Road link) a further recommendation has been made by the Chief Executive to add to the existing SLO for the lands in the County Development Plan to include for phasing as follows: *Development of the subject lands shall be phased in accordance with the delivery of roads and public transport and active travel infrastructure to the satisfaction of the Planning Authority.* Both of these additional CE Recommendations to the proposed Amendments are included within the relevant amendment of this report. The issues raised in relation to active travel and integrated transport modelling is noted. The Knocklyon–Ballyboden Active and Sustainable Travel Scheme facilitate safer cycling in the area, and it is not considered that the road proposals in this area will negatively impact on that, rather any road upgrades here will facilitate a wider network of active travel in the area. In relation to modelling, the NTA strategically models the Greater Dublin Area and use of this model is availed of in relevant area-based transport assessments as required.

transport and environmental assessment is undertaken before introduction of further rezonings. It is noted that, alongside Amendment No. 23 for the Edmondstown-Whitechurch road connection, the purpose of both appears primarily to facilitate access to potential residential development lands rather than as solving an existing bottleneck. It is requested that both amendments be deleted or as a minimum deferred pending a corridor-wide transport and cumulative impact assessment.	**Ballyboden LAP** It is submitted that the road network should be considered within the context of a coordinated planning framework for the wider corridor, including the Ballyboden Local Area Plan, rather than being introduced through a focused Development Plan variation. The Planning Authority notes the concerns raised that the proposals in this area are premature pending the preparation of a new Local Area Plan for Ballyboden as per QDP14 SLO 2 of the current CDP. It should be noted that, under Part 3 of the Planning Act 2024, Local Area Plans no longer exist as a mechanism for land use planning and development. Development within the general Ballyboden area will continue to be guided by the comprehensive provisions, including the zoning and related policies and objectives, within the current CDP, alongside provisions relating to the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area and other county-wide policies and objectives of the CDP. There will be opportunity to review the requirement or otherwise for an area plan for Ballyboden, notwithstanding that a boundary would have to be identified for it, as part of the review of the next County Development Plan. **Landscape Character and Owendoher Linear Park** Concerns were raised in the submission regarding the impact on the rural character of the Edmondstown Road and on Owendoher Linear Park which runs along the western side of the existing road. The proposed Variation No. 2 of the CDP 2022-2028 has been subject to SEA and to AA. The route of Amendment No. 22 is located in an area designated as 'N/A' under the Landscape Character Assessment Sensitivity Map in

	Appendix 9 of the Landscape Character Assessment (LCA) of the CDP 2022-2028. 'N/A' or 'Suburban South Dublin' in terms of its Landscape Character is described as follows: *Built-up urban area with extensive housing estates and industrial /commercial parks. Variety of house styles and layouts dating from the late 19th century to late 20th century. The settlements of Rathfarnham, Templeogue and Clondalkin with important historical legacy and remnants. Major traffic corridors with M50 traversing north-south through the area, and Luas line travelling north from Tallaght, parallel to the M50, to city centre. Corridors of natural and semi natural vegetation, notably along the River Dodder (a linear park) and the Camac River. Grass open spaces in gardens, industrial parks, golf courses, school playing fields, and miscellaneous spaces in housing areas. Street trees planting and recreational facilities – public parks and golf courses - provide amenities and ecological resources.* The principles for development within this area under the LCA are: • *Grassland and other amenity area open spaces should be managed for the dual benefits of public access and biodiversity.* • *Tree and shrub planting should be an integral component of amenity grasslands (schools recreational grounds, golf courses and playing fields).* • *The development of green infrastructure to connect different habitats within the urban context.* • *Tree planting on streets and open spaces – particularly on 'miscellaneous 'open space in housing areas- to improve their character.*

- *Enhance connectivity between open spaces as a means of enhancing biodiversity while providing off road connections for pedestrian and cyclists.*
- *Proposed developments should be audited for their impact on views particularly those to the rural hinterland of the county.*

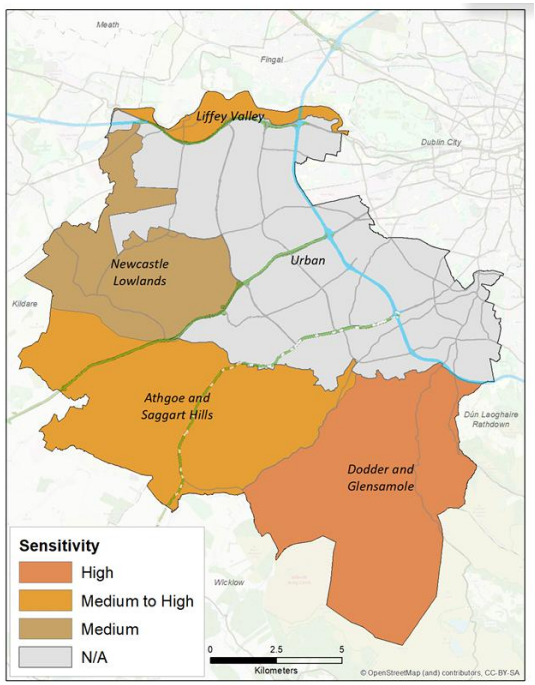


Image from the Landscape Character Assessment Sensitivity Map in Appendix 9 of the Landscape Character Assessment (LCA) of the CDP 2022-2028.

As indicated above, one of the principles of the LCA in areas categorised as urban is the development of green infrastructure to connect different habitats within the urban context.

	It is recognised that the Owendoher River is a valuable riparian corridor that runs parallel to the existing Edmondstown Road and will present constraints to any road upgrades. Any upgrades to Edmondstown Road, on foot of Amendment No. 22, will be subject to environmental assessment at detailed design and planning stage which will reflect the relevant policy within the County Development Plan related to riparian corridors, biodiversity and green infrastructure. **Environmental Assessments** The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Edmondstown. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. With regard to the specific lands within this amendment and amendment 23, the SEA and AA to the proposed Variation states: SEA: *The above link road proposal and upgrades to existing road (Edmondstown Road) will be subject to environmental and ecological assessments as part of any detailed design and consenting process,*

	including as appropriate EIA, AA, EcIA assessments. Mitigation is identified as being addressed through project level assessment and compliance with existing environmental protection measures in the South Dublin CDP 2022-2028. These include policies for protection of environmental resources including riparian corridors and Green infrastructure policies. AA: *The above link road proposal and upgrades to existing road (Edmondstown Road) will be subject to environmental and ecological assessments and screening for Appropriate Assessment as a minimum as part of any detailed design and consenting process. Mitigation is identified as being addressed through project level assessment and compliance with existing environmental protection measures in the South Dublin CDP 2022-2028. These include policies for protection of environmental resources including riparian corridors and Green Infrastructure policies.* Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. Following this review of the issues raised, the following comments were received: 'The potential effects on the receiving waters on the Dodder catchment are addressed and assessed at strategic, county scale in proportion to the county scale of the proposed variation. The SEA and NIR will provide more cumulative assessment across the proposed variation on surface and groundwater via assessment of Proposed Variation lands across sub catchments identified under the

	WFD. This complements the existing data from WFD in relation to water quality in and around the plan area. **AA:** Section 7.2 of the NIR states: "*.. of the four European Sites being examined as part of the assessment of the hydrological pathway, only three are connected to the project site via the surface water pathway. The nearest point of the three Dublin Bay European Sites from a Proposed Variation Land or Future Strategic Long-term Development Area is approximately 13km downstream (i.e. downstream from Proposed Variation lands Cherryfield Way along the River Dodder). The River Dodder and the waters discharging from it to the Liffey Estuary represent a minor fraction of the overall volume of freshwater draining into the Liffey estuary and Dublin Bay. This will limit the potential for future projects facilitated by the Plan, even in the event of the release of contaminated surface water from synchronous development in multiple Plan areas from having a perceptible effect on water quality and the conservation status of European Sites at Dublin Bay. This point is supported by previous studies which have shown that pollutants in the estuary are rapidly mixed and become diluted within the estuary and Dublin Bay (O'Higgins and Wilson, 2005; Wilson and Jackson, 2011), demonstrating that any potential for the release of contaminants to hydrological pathways and Dublin bay will not have the potential to result in any perceptible effect to water quality downstream at Dublin Bay*." It is noted as part of the consultation that UÉ comments upon network constraints and this will be referred to as appropriate. It is further noted that it is beyond the scope of the SEA to undertake specific county level assessment of water and wastewater infrastructure capacity and network as it must rely upon the most recent and available data on

	water supply and wastewater provided by Uisce Éireann. This is already included in the SEA and NIR as appropriate. Please also see text above from Section 7.2 of the NIR. It is noted that concerns are highlighted in relation to cumulative and in combination effects. Section 7.5 of the NIR and Section 7.3 of the SEA ER identify and comment on the potential for significant cumulative effects arising from plans in particular, given this is a county scale land use plan. Plans and programmes considered as part of this assessment includes the hierarchy of land use and related plans pertinent and relevant to the Proposed Variation, namely: • National Planning Framework First Revision, • River Basin Management Plan for Ireland 2024, • Eastern and Midland Regional Economic and Spatial Strategy, • Catchment-based Flood Risk Assessment and Management (CFRAM) and Flood Risk Management Plans, • Greater Dublin Drainage Project, • National 4th Biodiversity Action Plan 2023-2030, • Transport Strategy for the Greater Dublin Area 2022- 2042, • South Dublin Climate Change Action Plan 2024 -2029, • BusConnects, • DART+ South West and DART +West, • Dublin City Development Plan 2022 -2028. Dún Laoghaire Rathdown County Development Plan 2022 -2028. Kildare County Development Plan 2022 -2028. Fingal County Development Plan 2023 -2029. All of the above plans and programmes have been subject to full SEA and AA and where relevant project level assessment via the EIA and AA

	Directives. As the SEA and AA conclude relating to transport related projects: *Of the above transport related projects BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale.* A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP. Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process.'

	Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Amendment No. 22 as proposed, is to enhance pedestrian, cycling and public transport facilities and access to newly developing residential lands, and is considered to be in alignment with national, regional and local planning policy and has been assessed under SEA and AA.

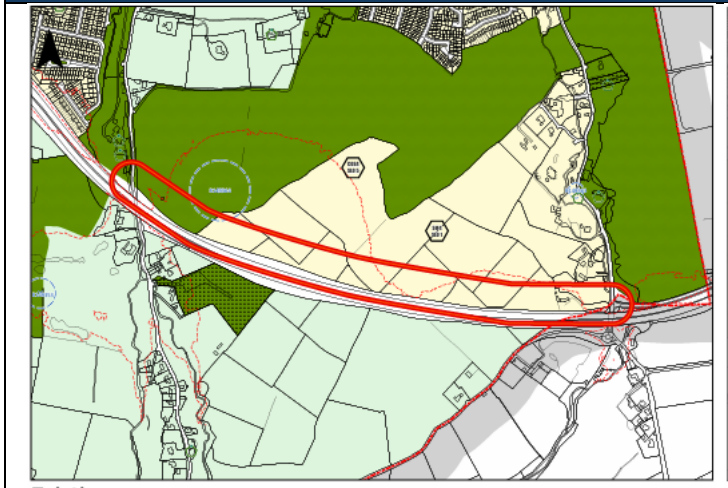
CE Recommendation

To amend the Proposed Year Road Objective in Table 7.5 Six Year Road Programme in the Written Statement as follows:

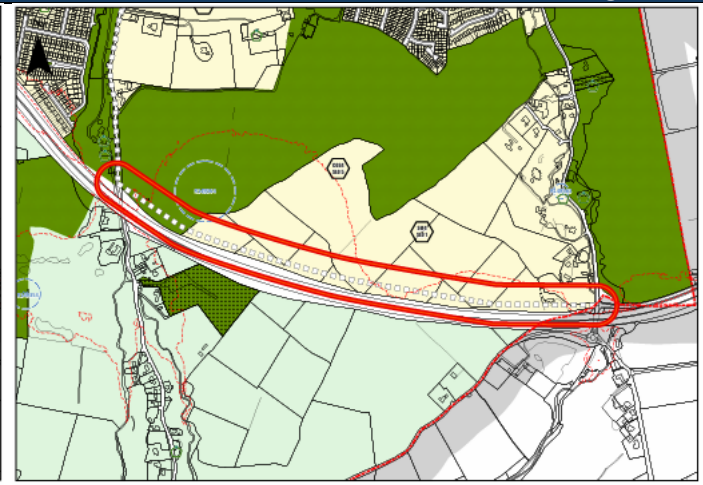
Road	Description	Function
Edmondstown Road Upgrade	Upgrade of existing road	To enhance pedestrian, cycling and public transport facilities and access to new**ly developed** residential lands.

Note: Please read above in conjunction with related CE Recommendations to Amendment 7 and to Amendment 23.

AMENDMENT NO. 23 - WHITECHURCH-EDMONDSTOWN (Connecting road)



Existing



Proposed

Submission No.

SD-C401-CDP25-860 – Roisin O'Shea

SD-C401-CDP25-1041 – Transport Infrastructure Ireland

SD-C401-CDP25-1513 – National Transport Authority

SD-C401-CDP25-1647 – Stephen Dolan

SD-C401-CDP25-1663 – Roisin Mannion

SD-C401-CDP25-1664 – Knocklyon Network

SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG

Summary	CE Response
The main concerns raised relate to Traffic and Roads issues with other issue including Transport Infrastructure Ireland (TII) requirements, impacts on the rural character of Whitechurch Road,	**Overview** Amendment No. 23 at Whitechurch-Edmondstown proposes a New 6 Year Road Objective to Table 7.5 Six Year Road Programme as follows:

overdevelopment, zoning and density, infrastructure delivery in tandem with development, public transport and lack of social and community infrastructure to support additional development. Submissions were received from individuals, groups such as Ballyboden Tidy Town and the Knocklyon Network CLG and state bodies such as TII.

Roads – TII

TII identifies potential interaction of proposed Amendments No. 22 and No. 23 which occur at a location where the M50 motorway is subject to management under PPP Concession and TII Structures exist.

TII acknowledges that proposed Amendment No. 23 (Whitechurch-Edmondstown Road connection) for a new local road objective is indicative. However, having regard to the proposed amendment's proximity to the M50, TII highlights that any works associated with the installation of the proposed local road must occur outside of the motorway boundary to avoid impacting the M50 and associated infrastructure including drainage.

TII highlight that any proposals in proximity to or within PPP managed areas require prior consultation with TII and demonstrated of compliance with all relevant TII Publications (Standards & Technical) requirements. TII Publications are available at the dedicated website www.tiipublications.ie.

Road	Description	Function
Link between Edmondstown Road and Whitechurch Road	New road /street and associated junction upgrades connecting Edmondstown Road and Whitechurch Road.	To provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands.

Amendment No. 23 is for a new road connecting Whitechurch Road and Edmondstown Road, as indicatively shown on the map above. The function of the new road is 'to provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands.'

The proposed new road would traverse the Whitechurch-Edmondstown lands which are zoned Objective 'RES': 'To protect and / or improve residential amenity' primarily, with an area at the western end where the road objective joins Edmondstown Road zoned Objective 'OS': 'To preserve and provide for open space and recreational amenities'.

TII recommends implementation of New Specific Objectives (Transportation) for New 6 year roads objectives have regard to the presence and extent of the M50 and associated infrastructure, inducing (sic) compliance with TII Publications and advanced implementation consultation with TII to ensure avoidance of the M50, in the interests of maintaining the safe and efficient operation of the national roads network in accordance with official national road policy and public safety, **Zoning, Overdevelopment, Density** With regard to the zoning, it is considered to be overdevelopment and it is asserted that there is a lack of adequate infrastructure to support it. The current balance of low-density residential development supported by recreational open space should be preserved, it is submitted. A submitter in favour of change subject to associated infrastructure delivery in tandem. **Biodiversity and Green Infrastructure** It is submitted that open lands adjoining Edmondstown Golf Club have the potential to function as part of a local ecological and green infrastructure corridor, supporting wildlife movement and environmental sustainability. **Community and Social Infrastructure**	Other related amendments proposed under Variation No. 2 in this area are Amendment No. 7 to rezone lands off Edmondstown Road from 'RU' to 'RES' together with Specific Local Objective CS7 SLO6, and Amendment No. 22 for the upgrade of Edmondstown Road to enhance pedestrian, cycling and public transport facilities and provide access to new residential area. Within the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area are Amendment No. 12 to rezone lands at Cherryfield Way from 'HA-DV' to 'RES' and Amendment No. 21 consisting of the proposed removal of the designation school site at Stocking Avenue. These amendments are considered elsewhere within the CE Report except insofar as they are responded to by way of addressing issues relating to this amendment. **Traffic, Roads and Public Transport** Submissions raise concerns regarding existing transport constraints and traffic congestion. It is also submitted that the combined effects of road capacity changes, growth arising from the proposed variation and additional development have not been evaluated through integrated transport modelling. The County Development Plan (CDP) 2022-2028 seeks to ensure and promote Sustainable Movement and Transport Objectives, which prioritise sustainable modes including walking, cycling and public transport, reduce reliance on private car use and ensure transport and land use integration. Overarching policies SM1 and SM2 of the CDP 2022-2028 promote modal shift and integrated transport networks and ensure that new developments are located where they can be served by high-quality public transport.

It is submitted that there is a lack of community and social facilities in the area, significant traffic and parking issues, oversubscribed schools, limited availability in existing medical services such as GP and dental services, and inadequate child care spaces to meet existing demand.

Public Transport
It is submitted that the area remains heavily car dependent, with limited high-capacity public transport options available to support additional residential density.

Traffic and Roads
It is submitted that the road network serving the Knocklyon / Ballyboden / Edmondstown corridor is already under significant pressure, particularly during peak commuting hours and further residential zoning would introduce additional traffic demand onto a network with limited alternative access routes.

Objections raised to the proposed objective to link Whitechurch Road and Edmondstown Road. It is submitted that part of Whitechurch Road between Taylor's Lane and College Road is one of the few left in the area that has not been developed and as such retains much of the rural characteristics it has had for centuries, and this character should be preserved. Creating a link to Edmondstown Road would inevitably increase traffic on this rural road to an intolerable degree and would eventually lead to

South Dublin County Council is responsible for the management of the regional and local road network. The Council's proposals for the short and medium to long term development of the regional road network are outlined in Table 7.5 Six Year Road Programme and Table 7.6 Medium to Long Term Road Objectives and are subject to consultation with TII. The CDP states that the Council may, at its discretion, introduce an additional road proposal, where such a proposal benefits economic and population growth.

The NTA has indicated that Edmondstown Road is one of the lowest priority sites, from a transport accessibility point of view. The lack of access to public transport for the existing zoned lands at Whitechurch-Edmondstown is recognised. It is in this context that the Council is seeking to overcome the transport issues by way of amendments 22 and 23 which would both assist in unlocking the long-time zoned land immediately south of the M50 and facilitate the rezoning of the Edmondstown Road lands. A new specific objective for Amendment 22, the Edmondstown Road upgrade has a CE recommendation to revise its function in Table 7.5 to read:

Road	Description	Function
Edmondstown Road Upgrade	Upgrade of existing road	To enhance pedestrian, cycling and public transport facilities and access to new**ly developing** residential lands.

As set out above, Amendment No. 23 provides for a new specific objective to insert the following into Table 7.5 of the Written Statement:

demands to both straighten and widen it, it is asserted.

Concerns raised with the proposed Whitechurch–Edmondstown Road connection impeding on a sensitive landscape. It is submitted that there is no clear evidence that these upgrades would resolve current congestion. These works may introduce additional traffic pressures, it is suggested.

References are made to the Knocklyon–Ballyboden Active and Sustainable Travel Scheme and concerns are raised regarding SDCC undergoing public consultation on the Scheme, with the scheme being related to roads in the same corridor and having the same submission deadline as the Variation. It is submitted that it is essential that the combined effects of infrastructure changes and additional development potential are considered together. Similarly, while sustainable transport improvements are supported, it is submitted that the combined effects of road capacity changes, growth arising from the proposed variation and additional development have not been evaluated through integrated transport modelling.

The proposal to upgrade Edmondstown Road and to connect Edmondstown road to Whitechurch road appears to facilitate development of surrounding lands rather than resolve existing transport constraints, it is asserted.

Road	Description	Function
Link between Edmondstown Road and Whitechurch Road	New road / street and associated junction upgrades connecting Edmondstown Road and Whitechurch Road.	To provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads. The alignment to be incorporated into a masterplan-led design approach to development of the residential lands.

In addition, the 'RES' zoned lands at Whitechurch-Edmondstown are already subject to a specific local objective (SLO) in the County Development Plan which reads:

SM4 SLO1:
To ensure that development on these lands at Whitechurch / Edmondstown is facilitated through a comprehensive transport needs assessment, to identify all necessary transport infrastructure, its preferred location, and the appropriate delivery mechanisms in consultation with relevant stakeholders. The transport needs assessment shall have regard to existing environmental sensitivities in the area.

It is recommended that, to ensure the phased development of the existing 'RES' lands, SM4 SLO1 be amended by the addition of the following:

It is submitted that the road network in the wider area (termed 'the corridor') already experiences congestion at key junctions including the roundabouts at Ballyboden, Scholarstown and Orlagh. It is further submitted that additional traffic pressures also come from permitted but unbuilt residential developments in the area and the Hellfire Club tourism development expected to attract approximately 300,000 visitors annually (the figure of 30,000 is also mentioned). It is requested that the Whitechurch-Edmondstown road connection is removed and that the urbanising or widening of the Edmondstown Road is avoided. It is also requested that a cumulative transport and environmental assessment is undertaken before introduction of further rezonings. It is noted that, alongside Amendment 22 for the Edmondstown Road upgrade, the purpose of both appears primarily to facilitate access to potential residential development lands rather than as solving an existing bottleneck. It is requested that both amendments be deleted or as a minimum deferred pending a corridor-wide transport and cumulative impact assessment. It is submitted that a link between the Edmondstown and Whitechurch Road would create a new east-west connection through a sensitive foothills landscape	***Development of the subject lands shall be phased in accordance with the delivery of supporting transport infrastructure, including road upgrades, public transport services, and active travel facilities, to the satisfaction of the Planning Authority.*** In addition, Amendment 7 Edmondstown Road rezoning includes a Proposed Specific Local Objective which the Chief Executive has recommended to be amended further to include a new point d. as follows: *Development on RES zoned lands on Edmondstown Road shall comply with the following:* *a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority.* *b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage.* *c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping insofar as possible within development proposals.* **d. Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be complete prior to the occupation of development. Measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 shall be agreed with the NTA.** Having regard to both amendments proposed to Table 7.5 involving upgraded and new road connections, and the further amendments outlined above, it is considered that while public transport is currently

within the wider Dodder catchment and would operate as a strategic development access route. It is stated that it would risk opening further lands to development pressure while channelling additional traffic into a network already known locally to be constrained. It is submitted that there is no integrated corridor level transport analysis demonstrating how Amendments No. 22 and No. 23 would interact with existing congestion at the Ballyboden, Scholarstown and Orlagh roundabout and the proposed Active Travel scheme or improve the constraints. Further demands will be placed on the network through permitted but unbuilt schemes and the visitors to the Hellfire Club tourism development. In the absence of further analysis, it is asserted that the road objectives are premature and unsound. It is submitted that the road network should be considered within the context of a coordinated planning framework for the wider corridor, including the Ballyboden Local Area Plan, rather than being introduced through a focused Development Plan variation.	unavailable, it will be feasible in a phased manner once the necessary road upgrades are undertaken. The Council will engage further with the NTA to facilitate improved public transport connections to the lands. **Ballyboden LAP** It was submitted that the road network should be considered within the context of a coordinated planning framework for the wider corridor, including the Ballyboden Local Area Plan, rather than being introduced through a focused Development Plan variation. The Planning Authority notes the concerns raised that the proposals in this area are premature pending the preparation of a new Local Area Plan for Ballyboden as per QDP14 SLO 2 of the current CDP. It should be noted that, under Part 3 of the Planning Act 2024, Local Area Plans no longer exist as a mechanism for land use planning and development. Development within the general Ballyboden area will continue to be guided by the comprehensive provisions, including the zoning and related policies and objectives, within the current CDP, alongside provisions relating to the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area and other county-wide policies and objectives of the CDP. There will be opportunity to review the requirement or otherwise for an area plan for Ballyboden, notwithstanding that a boundary would have to be identified for it, as part of the review of the next County Development Plan. **Overdevelopment and Density** As mentioned above, Amendment No. 23 will primarily serve lands that are zoned 'RES'. The indicative road alignment traverses the existing 'RES' zoned lands to the south. It is noted that these lands for residential development have been zoned for approximately 18 years, since the adoption of the 1998-2004 South Dublin County

	Development Plan, and have not come forward for development, in large part due to the constrained road infrastructure. The Whitechurch-Edmondstown lands zoned 'RES' already contain the following Specific Local Objectives in the County Development Plan: *SM4 SLO 1: To ensure that development on these lands at Whitechurch/Edmondstown is facilitated through a comprehensive transport needs assessment, to identify all necessary transport infrastructure, its preferred location, and the appropriate delivery mechanisms in consultation with relevant stakeholders. The transport needs assessment shall have regard to existing environmental sensitivities in the area.* *COS4 SLO 5: To ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.* The Planning Authority notes the concerns raised in the submissions in relation to overdevelopment of the area and maintaining the existing low residential density. In assessing the appropriateness of residential zoning, the Planning Authority is guided by the shared goals identified in the NPF and RSES as National Strategic Outcomes and Regional Strategic Outcomes, namely the achievement and delivery of Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society. Specially, this includes: • Priority growth areas specified in the Metropolitan Area Strategic Plan

	• Compact growth and infill development • Brownfield/greenfield • Proximity to centres of services and social infrastructure • Proximity to high-capacity public transport These parameters are applied by the Local Authority in tandem with the objectives of the South Dublin County Development Plan 2022–2028, as well as other relevant Section 28 Guidelines issued by the DHLGH. The 'RES' zoned lands which the Amendment No. 23 Six Year Road objective is to serve are referred to here as the Whitechurch-Edmondstown lands. It should be noted that these lands have been zoned 'RES' for five Development Plan cycles – 1998-2004, 2004-2010, 2010-2016, 2016-2022 and 2022-2028. Amendments No. 23 (in conjunction with Amendment No. 22) support and facilitate the development of these zoned lands after approximately 18 years. As set out above, the Chief Executive has recommended additional amendments to the SLO in relation to phasing on these lands and on the Edmondstown Road rezoning. These will ensure that development occurs in a phased manner in line with the delivery of public transport and associated infrastructure. In addition, in terms of local services, the SLO for the Edmondstown lands includes the need for a local centre to serve the day-to-day needs of surrounding residents unless otherwise agreed in writing by the planning authority. Similarly, the new road objective in Table 7.5 connecting Edmondstown Road to Whitechurch Road requires it to be incorporated as part of a masterplan-led approach to development of the lands, any masterplan process will assess the need for supporting facilities for residential development. Once the necessary infrastructure is delivered it is considered that these lands, within the Dublin City and Suburbs Settlement Area, will

	provide for compact development in line with national, regional and local policy. **Community and Social Infrastructure** Concerns are raised regarding a lack of community and social facilities in the area, including oversubscribed schools. As described above, the SLO pertaining to Amendment No. 7 (proposed 'RES lands to the north/northwest of the subject road proposal), namely CS7 SLO6, requires *'a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority.'* In addition, the required masterplan-led approach to the existing zoned lands within which this road will be design led, will ensure that the necessary community and social infrastructure to serve the development can be considered as part of that process. Also, proposed upgrades to Edmondstown Road (Amendment No. 22) would also provide improved access to services at established local and village centres in the surrounding area. In addition, the Council will continue to support the provision of appropriate childcare facilities through the development management process, in consultation with the South Dublin County Childcare Committee, as well as other key state bodies and consultees to ensure proposed facilities meet the required standards. The Council will also continue to liaise with the HSE and other relevant bodies and stakeholder to ensure adequate health facilities are supported in their development in appropriate locations, such as the

	Ballyboden Primary Care Centre on Edmondstown Road to the north of the subject lands. It is important to note that the provision of community and social infrastructure in conjunction with planned growth is guided and supported by the CDP 2022-2028 and other SDCC policy documents such as the South Dublin County Local Economic and Community Plan (LECP) 2024–2030, the South Dublin Libraries Development Plan 2023-2027 and the Age-Friendly Strategy 2020-2024. **Schools** In recent years, at the wider Templeogue / Walkinstown / Rathfarnham / Firhouse Neighbourhood Area, the following school place provision related activity is noted: • New School – Gaelscoil Chnoc Liamhna, Dublin 16 – delivered in 2023. • Major Project to provide a new permanent school for Firhouse Educate Together Secondary School on Oldcourt Rd, Ballycullen, Firhouse, is currently at Stage 3 (Tender Stage). Firhouse ETSS is currently in temporary accommodation on the same site. • Major Project at Sancta Maria College, Ballyroan, to provide a new PE hall, changing rooms and toilets, is currently at Stage 2b (Detailed Design). • Major Projects at Templeogue College and the Libermann Spiritan School for extensions/additional accommodation are currently at Stage 2a (Developed Sketch Scheme). • Major Project at Clochar Loreto National School, Rathfarnham, for construction of 21 classroom primary school building is at Stage 3 (Tender Stage).

	The submission from the Department of Education and Youth indicates that their preference would be to expand existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. The Department raises concerns regarding the proposed removal of the school site objective at Stocking Lane to facilitate residential development. This will be dealt with in the Chief Executive's response and recommendation to Amendment 21. **Biodiversity and Green Infrastructure** Concerns are raised regarding the impact of Amendment No. 23 on the open lands and on the local ecological and green infrastructure corridor. It should be noted that the CDP 2022-2028 sets out important policies and objectives which protect, conserve, and enhance the County's biodiversity and ecological connectivity and promote the development of an integrated GI network. These policies and objectives will inform the masterplan-led approach required by the new road objective in Table 7.5 for Amendment 23. Furthermore, any such road development proposal, on foot of Amendment No. 23, will be subject to environmental assessment at detailed design and planning stage, including EIA and AA. **Rural Character** Concerns were raised regarding the impact on the rural characteristics of Whitechurch Road which would inevitably increase traffic on this rural road, eventually leading to demands to both straighten and widen it.

	For clarity, the proposed road to link Edmondstown Road and Whitechurch Road does not propose any upgrades to the Whitechurch Road other than where the two meet. The proposed new road will have the effect of extending the existing College Road (R113) further west across the RES zoned lands. Given the fixed constraints on the Whitechurch Road the upgrade of the Edmondstown Road and the further connectivity provided by the connection road subject to this amendment, will provide alternatives to the Whitechurch road. Should there be any negative impact on the Whitechurch Road by way of additional traffic, can be examined further should it arise. **Environmental Evaluation** The Planning Authority notes the issues raised in submissions regarding the adequacy of the environmental assessment framework supporting the proposed variation, including questions relating to whether the variation provides a comprehensive cumulative assessment of environmental impacts at plan level, noting the interaction between wastewater capacity, additional residential development and downstream water quality. The Planning Authority wishes to clarify that both a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) process were undertaken in respect of the proposed variation, including the zoning of lands at Edmondstown. Following formal screening, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation, including cumulative impacts. With

	regard to the specific lands within this amendment and amendment 23, the SEA and AA to the proposed Variation states: SEA: *The above link road proposal and upgrades to existing road (Edmondstown Road) will be subject to environmental and ecological assessments as part of any detailed design and consenting process, including as appropriate EIA, AA, EcIA assessments. Mitigation is identified as being addressed through project level assessment and compliance with existing environmental protection measures in the South Dublin CDP 2022-2028.These include policies for protection of environmental resources including riparian corridors and Green infrastructure policies.* AA: *The above link road proposal and upgrades to existing road (Edmondstown Road) will be subject to environmental and ecological assessments and screening for Appropriate Assessment as a minimum as part of any detailed design and consenting process. Mitigation is identified as being addressed through project level assessment and compliance with existing environmental protection measures in the South Dublin CDP 2022-2028. These include policies for protection of environmental resources including riparian corridors and Green Infrastructure policies.* Notwithstanding, the issues raised by the submissions as they related to the SEA and AA were further reviewed by the environmental consultants at the request of the Planning Authority. Following this review of the issues raised, the following comments were received:

	‘The potential effects on the receiving waters on the Dodder catchment are addressed and assessed at strategic, county scale in proportion to the county scale of the proposed variation. The SEA and NIR will provide more cumulative assessment across the proposed variation on surface and groundwater via assessment of Proposed Variation lands across sub catchments identified under the WFD. This complements the existing data from WFD in relation to water quality in and around the plan area. **AA:** Section 7.2 of the NIR states: “*.. of the four European Sites being examined as part of the assessment of the hydrological pathway, only three are connected to the project site via the surface water pathway. The nearest point of the three Dublin Bay European Sites from a Proposed Variation Land or Future Strategic Long-term Development Area is approximately 13km downstream (i.e. downstream from Proposed Variation lands Cherryfield Way along the River Dodder). The River Dodder and the waters discharging from it to the Liffey Estuary represent a minor fraction of the overall volume of freshwater draining into the Liffey estuary and Dublin Bay. This will limit the potential for future projects facilitated by the Plan, even in the event of the release of contaminated surface water from synchronous development in multiple Plan areas from having a perceptible effect on water quality and the conservation status of European Sites at Dublin Bay. This point is supported by previous studies which have shown that pollutants in the estuary are rapidly mixed and become diluted within the estuary and Dublin Bay (O'Higgins and Wilson, 2005; Wilson and Jackson, 2011), demonstrating that any potential for the release of contaminants to hydrological pathways and Dublin bay will not have the potential to*

	result in any perceptible effect to water quality downstream at Dublin Bay." It is noted as part of the consultation that UÉ comments upon network constraints and this will be referred to as appropriate. It is further noted that it is beyond the scope of the SEA to undertake specific county level assessment of water and wastewater infrastructure capacity and network as it must rely upon the most recent and available data on water supply and wastewater provided by Uisce Éireann. This is already included in the SEA and NIR as appropriate. Please also see text above from Section 7.2 of the NIR. It is noted that concerns are highlighted in relation to cumulative and in combination effects. Section 7.5 of the NIR and Section 7.3 of the SEA ER identify and comment on the potential for significant cumulative effects arising from plans in particular, given this is a county scale land use plan. Plans and programmes considered as part of this assessment includes the hierarchy of land use and related plans pertinent and relevant to the Proposed Variation, namely: • National Planning Framework First Revision, • River Basin Management Plan for Ireland 2024, • Eastern and Midland Regional Economic and Spatial Strategy, • Catchment-based Flood Risk Assessment and Management (CFRAM) and Flood Risk Management Plans, • Greater Dublin Drainage Project, • National 4th Biodiversity Action Plan 2023-2030, • Transport Strategy for the Greater Dublin Area 2022- 2042, • South Dublin Climate Change Action Plan 2024 -2029,

	• BusConnects, • DART+ South West and DART +West, • Dublin City Development Plan 2022 -2028. Dún Laoghaire Rathdown County Development Plan 2022 -2028. Kildare County Development Plan 2022 -2028. Fingal County Development Plan 2023 -2029. All of the above plans and programmes have been subject to full SEA and AA and where relevant project level assessment via the EIA and AA Directives. As the SEA and AA conclude relating to transport related projects: *Of the above transport related projects BusConnects, Dart+ South West, Dart+ West have received planning approval with works commenced on the BusConnects. These projects have been subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and decarbonise the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale.* A thorough evaluation of cumulative and in combination significant effects was undertaken under the SEA and AA as documented in the relevant sections referenced above and throughout the assessment process. Potential cumulative effects on European sites, wastewater management capacity, water quality, and flood risk have been considered. South Dublin CDP 2022–2028 provides an existing range of mitigation measures which seeks to mitigate cumulative effects informed by the SEA and AA of the CDP.

	Furthermore, the approach via the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the Proposed Amendments which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The SEA and AA at county scale provides higher level framework to provide guidance and raise issues that should be addressed at the lower tier of the statutory planning and consenting process.' Having regard to the above, it is considered that the SEA and AA have satisfactorily addressed the cumulative impacts of the Variation and comply with the requirements of the associated Directives. The additional cumulative impacts assessment carried out in response to the issues raised in the submissions will be reflected in the final SEA alongside any other updates required following the relevant Planning Authority meeting. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Amendment No. 23 as proposed, to provide an active travel and vehicular connection between Edmondstown Road and Whitechurch Road providing access to the residential lands between the two roads, with the alignment to be incorporated into a masterplan-led design approach to development of the residential lands, is considered to be in

	alignment with national, regional and local planning policy and has been assessed under SEA and AA.
CE Recommendation To amend the existing Specific Local Objective SM4 SLO1 in the County Development Plan on the Whitechurch-Edmondstown lands as follows: To ensure that development on these lands at Whitechurch/Edmondstown is facilitated through a comprehensive transport needs assessment, to identify all necessary transport infrastructure, its preferred location, and the appropriate delivery mechanisms in consultation with relevant stakeholders. The transport needs assessment shall have regard to existing environmental sensitivities in the area. **Development of the subject lands shall be phased in accordance with the delivery of supporting transport infrastructure, including road upgrades, public transport services, and active travel facilities, to the satisfaction of the Planning Authority.** **Note:** Please read above in conjunction with related CE Recommendations to Amendment 7 and to Amendment 22.	

3.2 Amendments relating to the Written Statement

AMENDMENTS NOS. 24 - 63 (Written Statement)		
Submission No.		
SD-C401-CDP25-36 – Daren O Brien	SD-C401-CDP25-305 – Weston Airport	SD-C401-CDP25-403 – Thomas Harte
SD-C401-CDP25-433 – Joe O'Rourke	SD-C401-CDP25-596 – The Maritime Area Regulatory Authority (MARA)	SD-C401-CDP25-825 – Jennifer Merriman
SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-969 – Dermot McGreal	SD-C401-CDP25-1041 – Transport Infrastructure Ireland
SD-C401-CDP25-1056 – Office of Public Works	SD-C401-CDP25-1077 – AIMEE AHERN	SD-C401-CDP25-1159 – David Whittle
SD-C401-CDP25-1167 – Inland Fisheries Ireland	SD-C401-CDP25-1219 – Denis Twohig	SD-C401-CDP25-1239 – Cllr. Helen Farrell
SD-C401-CDP25-1325 – Siobhan Nolan	SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1375 – Office of the Planning Regulator
SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1450 – Edina Almasi
SD-C401-CDP25-1456 – Donal Curran	SD-C401-CDP25-1502 – daa	SD-C401-CDP25-1513 – National Transport Authority
SD-C401-CDP25-1542 – Sean Ward	SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1588 – John Spain Associates

SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1594 – Sara Feeney	SD-C401-CDP25-1597 – Cllr Vicki Casserly
SD-C401-CDP25-1603 – John Devaney	SD-C401-CDP25-1645 – Clare Hamilton	SD-C401-CDP25-1676 – South Dublin Conservation Society
SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1752 – John McGivney
SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG		

Summary	CE Response
Apartment Guidelines (2025) A submission suggests that amendment Ref. No. 62 and amendment Ref. No. 63 do not specifically address the Apartment Guidelines (2025) and should also be incorporated into Table 1 of Appendix 1 to reflect same. **Land Capacity and New Zoning Requirements and Table 10** Submission refers to page 38 of the written statement and ask why is there a shortfall of 2,000 new dwellings when there is plenty of zoned capacity available? Is it a problem with infrastructure, services, building capacity? Submission refers to page 39 and noted that in the table (Table 10: Capacity of additional zoned lands in the South Dublin County	**Apartment Guidelines (2025)** The comments are noted that amendment Ref. No. 62 and amendment Ref. No. 63 do not specifically address the Apartment Guidelines (2025). The Design Standards for Apartments, Guidelines for Planning Authorities set national planning policy and guidance in relation to the planning and development of apartment schemes. The Guidelines were issued under section 28 of the Planning and Development Act 2000 (as amended) and under provisions within the new Planning Act 2024 will become National Planning Policy and Statements. While reference is made to the Apartment Guidelines in the amended Written Statement of the Variation, it is acknowledged that the relevant Specific Planning Policy Requirements (SPPRs) have not been incorporated fully into the Variation. It is recommended that the Written Statement and Appendix 1 be amended to reflect the Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025). **Land Capacity and New Zoning Requirements / Table 10**

Development Plan 2022-2028 as of 2026 in response to the *NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities* (2025)) there appears to be a mistake as the table indicates 7,324 (Total Potential (Units)) while other parts say 7,234 dwellings which equates to a 90 unit difference. **Compact Settlement Guidelines** Submission highlights the reference made to the proposed changes to private amenity space standards and reduced separation distances, alongside increased flexibility in open space provision under the Compact Settlement Guidelines (2024) and submits that the changes represent a series of planning decisions that collectively reduce existing protections for landscape character, open space and residential amenity within the wider corridor.	With regard to the comments made regarding the estimated shortfall figure of 2,000 new dwellings, it should be noted that the Settlement Capacity Audit Report (SCA) under Variation No. 2 sets out the background, methodology and approach to the audit carried out. The SCA states that, at a high level, there appears to be sufficient zoned land to meet the achievement of housing growth requirements into the early 2030s. Furthermore, there is additional 'Long-term Zoned Land Capacity' which will support the achievement of longer-term housing growth requirements subject to phased delivery, gradual regeneration and investment in infrastructure and services of those areas. Notwithstanding this, it is recognised that there are numerous factors which affect the actual delivery and timing of delivery of housing on zoned lands. Infrastructure, planning and deliverability assessments were carried out in respect to the existing zoned lands. Lands were assessed having regard to the rate of delivery to date, planning history, current construction and planning activity, status of ongoing/planned infrastructure works, existing uses and other known significant constraints to be addressed, as well as the infrastructure, planning and deliverability assessments. As such, factors constraining the potential for short-medium term delivery of zoned lands include those outlined in the submission of infrastructure, building capacity but also funding mechanisms and investment. With regard to 'Total Potential Units' figure in Table 10 of 7,324 (Total Potential (Units)) while the figure on page 39 indicates 7,234 new dwellings which equates to a 90 unit difference.

	The figure 7,324 as per Table 10 is correct. Reference to 7,234 on page 39 is in error. It is recommended that the Written Statement be amended to address this. **Compact Settlement Guidelines** Please CE Response to Amendment No. 7 where this issue is addressed. **Conclusion** The recommendation to amend references to the Apartment Guidelines within the Written Statement and to correct a figure in the text incorporates changes to a number of different Variation Amendments within the Written Statement, and also proposed new amendments and, with the exception of the typographical error which is included first, these are set out below in order of the Amendments in the Variation.

CE Recommendation

To amend Amendment Ref. No. 47 in Chapter 2 Core Strategy and Settlement Strategy, page 39 as follows:

Correct the figure 7,234 which was in included in error and amend to align with the figure in Table 10 of 7,324.

To incorporate amendments which update the Written Statement to reflect the Planning Design Standards for Apartments 2025:

To amend the Written Statement proposed Amendment 32 in Chapter 2 Core Strategy and Settlement Strategy, page 32 as follows:

- Add/amend bullet points in Section 2.4.2 as follows:

The contents of the following Guidelines have informed the Core Strategy and the policies and objectives of the Development Plan:

 Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, December 2020 and its replacement, the *NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities*,

July 2025;

- *Development Plans - Guidelines for Planning Authorities*, June 2022;
- ~~*Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities – Guidelines for Planning Authorities*, (2020) (the 'Apartment Guidelines') up to 2025~~ *Planning Design Standards for Apartments – Guidelines for Planning Authorities, 2025*;
- *Urban Development and Building Height Guidelines*, 2018;
- *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*, 2017;
- *Sustainable Residential Developments in Urban Areas*, May 2009 and its replacement, the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, 2024;
- *The Planning System and Flood Risk Management – Guidelines for Planning Authorities*, 2009;
- *Appropriate Assessment of Plans and Projects in Irelands – Guidance for Planning Authorities*, 2009; and the
- *Implementation of the SEA Directive: Guidelines for Regional Authorities and Planning Authorities, 2004 and as updated 2022.*

To amend the Written Statement in Chapter 5 Quality Design and Healthy Placemaking, Section 5.2.7, page 201:

QDP8 Objective 2:
In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of ~~Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)~~ Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of South Dublin County's Building Height and Density Guide that it is contextually appropriate to do so.

To amend the Written Statement in Chapter 6 Housing, Section 6.1, pages 224 and 225:

H1 Objective 12:
Proposals for residential development shall provide a minimum of 30%

3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:

→ there are unique site constraints that would prevent such provision; or

→ that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or

→ the scheme is a social and / or affordable housing scheme.

Note: ~~Build-To-Rent (BTR)~~ Apartment residential developments shall comply with the ~~*Sustainable Urban Housing: Design Standards for New Apartments (2020)*~~ *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)* (or any superseding ~~Section 28 Ministerial Guidelines~~ Guidance or National Planning Statement)

H1 Objective 13:

To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, ~~in line with~~ having regard to the ~~Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020)~~ *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)* and the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.

To amend the Written Statement in Chapter 12 Implementation and Monitoring, Section 12.5.2, pages 464, 465 as follows:

Design Statements:

In line with the provisions of Policy QDP7 Objective 1, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq m or as otherwise required by the Planning Authority) shall be accompanied by a Design Statement. The Design Statement should address contextual and urban design issues and clearly explain the design process, the design options considered and the rationale behind the adopted design development strategy. A Design Statement should consist of:

→ A detailed analysis of the proposal and statement based on the 12 design criteria set out in the *'Urban Design Manual'* (2009) and reflected in the South Dublin County Council's Building Height and Design Guide as follows;

- → Detailed design including materials and external finishes which should have regard to the policy, objectives and provisions of the South Dublin County Development Plan 2022-2028. In particular the guidance, and performance-based design criteria set out in the South Dublin County's Building Height and Density Guide must be incorporated with due regard being had to relevant Ministerial Guidelines including the *'Urban Design Manual' (2009);* ~~*'Sustainable Residential Development in Urban Areas'* (2009~~) Residential Development and Sustainable Compact Settlement Guidelines 2024; *'Urban Development and Building Height – Guidelines for Planning Authorities'* (2018); and ~~'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020)~~ *'Planning Design Standards for Apartments – Guidelines for Planning Authorities'* (2025) or as may be superseded.
- → A statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets.
- → Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement.

To amend the Written Statement in Chapter 12 Implementation and Monitoring, Section 12.6.1 pages 471-473 as follows:

12.6.1 Mix of Dwelling Types

The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality. ~~SPPR 1 of the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)* states that residential development may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studies) and there shall be no minimum requirement for apartments with three or more bedrooms~~.

Unit Mix

Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that: Implementation and Monitoring (IM)

- there are unique site constraints that would mitigate against such provision; or
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or
- the scheme is a social and / or affordable housing scheme.

Note: ~~Build-To-Rent (BTR)~~ Apartment residential developments shall comply with the ~~*Sustainable Urban Housing: Design Standards for New Apartments (2020)*~~ *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)* (or any superseding ~~Section 28 Ministerial Guidelines~~ Guidance or National Planning Statement)

Unit mix should also provide for:

- As part of the Housing Quality Assessment ~~defined under Section 6 of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)*~~ a detailed breakdown of the quantum of proposed unit types including the split between 1-bed, 2-bed, and 3-bed plus and which is in accordance with the minimum 30% 3-bed units outlined above, or as may be applicable under the *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*;
- A statement demonstrating how the scheme has been designed for / and could be adapted in the future for older people / persons with a disability / or lifetime homes, on a site or floor plan that:
- Are designed and located having regard to the needs of older people and / or persons with a disability;
- Are designed having regard to the concept of lifetime adaptable and / or multi-generational homes.
- In new identified residential areas, it is appropriate that schemes include a mix of house type and where a scheme

is solely houses, smaller units of less than 3-bed providing for multi-generational homes, must be provided, subject to urban design and ensuring efficient use of urban land.

To amend the Written Statement in Chapter 12 Implementation and Monitoring, Section 12.6.4, page 474 as follows:

Replace title and text as follows;

~~12.6.4 Build-to-Rent / Shared Living Accommodation~~
~~Build-to-Rent (BTR) accommodation consists of purpose-built, long-term rental apartment accommodation that incorporates dedicated residential amenities and facilities. All proposed BTR accommodation must comply with SPPR 7 and SPPR 8 as set out in the Apartment Guidelines.~~
~~Shared accommodation consists of purpose-built and managed accommodation where individual rooms are rented within an overall development that includes access to shared or communal facilities and amenities. Implementation and Monitoring (IM) In line with the SPPR 9 of the Apartment Guidelines, there shall be a presumption against granting planning permission for shared accommodation / co-living development unless the proposed development is required to meet specific demand identified under the Housing Need and Demand Assessment.~~

12.6.4 Purpose-Built Student Accommodation
SPPR 8 of the *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*, relates to student accommodation and is to provide flexibility in respect of single study bedrooms without en-suite bathrooms, and setting minimum space standards for kitchen, dining, and living areas serving 10 and 12 persons. The provisions SPPR 8 are based on key aspects of *The Design Guide for State Sponsored Student Accommodation* (May 2025) published in May 2025, that reflects best practices and supports the efficient delivery of state sponsored student accommodation, and also to inform the planning and design of off-campus forms of student accommodation that are led by the private sector.

To amend the proposed Variation Amendment Ref. No. 62 of the Written Statement in Chapter 12 Implementation and Monitoring, Section 12.6.7, pages 475-481 as follows:

- Amend bullet points and text in Section 12.6.7, page 475, as follows:

→ *Quality Housing for Sustainable Communities Guidelines,* DEHLG (2007);

- → ~~The Guidelines for Planning Authorities on *Sustainable Residential Development in Urban Areas* (2009), the companion *Urban Design Manual – A Best Practice Guide,* DEHLG (2009);and its replacement,~~ the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, 2024;
- → ~~*Sustainable Urban Housing: Design Standards for New Apartments (2020)*~~ *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*, or any replacement guidelines or planning policy statements.

To demonstrate compliance with the housing and apartment standards set out below, all planning applications shall be accompanied by a Schedule of Accommodation and Housing Quality Assessment document. For apartment development this shall be in line with Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)

- Amend text on second paragraph under sub-heading 'Apartments' on page 476 as follows:

All apartments shall comply with the Specific Planning Policy Requirements (SPRRs) of the ~~relevant Apartment Guidelines~~ *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025),* or any superseding Ministerial Guidelines or National Planning Statements issued by the Minister. ~~the standards set out under Appendix 1, and general contents of the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities,* DECLG (2020) (Apartment Guidelines).~~

- Amend text under sub-heading 'Dual Aspect' on page 479-480 as follows:

Dual aspect apartments should have openable windows on two or more walls which provides a view in more than just one direction. The use of windows, indents or kinks on single external elevations, in apartment units which are otherwise single aspect apartments, is not considered acceptable and / or sufficient to be considered dual aspect and these units, will be assessed as single aspect units. Requirement for dual aspect should accord with ~~relevant Apartment Guidelines~~ the *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025),* or any superseding Ministerial Guidelines or National Planning Statements issued by the Minister. ~~Preferably, the windows may be opposite one another, or adjacent around a corner. In line with SPPR 4 of the Apartment Guidelines:~~

- ~~There shall be a minimum of 33% dual aspect units required in more 'central and accessible urban locations', where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage,~~

- ~~In 'suburban or intermediate locations' it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme,~~
- ~~For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects,~~
- ~~Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable,~~
- ~~North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature,~~
- ~~Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings.~~

Amend text of second paragraph under sub-heading Building Lifecycle Report and Management Companies' Section 12.6.7 page 480 as follows:

As such, planning applications for apartment developments shall include a **building lifecycle report**.
The contents of this, in line with) *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)* includes;

Amend Section 12.6.7 under the sub-heading 'Apartments' as follows:

Apartments
An apartment refers to a self-contained residential unit in a multi-unit building with grouped or common access and may comprise duplex units. For the purposes of clarity, all apartment floor area measurements should be internal wall-to-wall dimensions.

All apartments shall comply with the Specific Planning Policy Requirements (SPRRs), and have regard to the standards set out under Appendix 1, and general contents of the ~~Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2020) (Apartment Guidelines).~~ Apartments Guidelines (2025).

The contents of the Guidelines have been incorporated below and the minimum floor areas set out ~~in Table 3.21 in line with~~ in SPPR ~~3~~ 2 of the ~~Apartment Guidelines~~ Apartments Guidelines (2025). The requirements of other relevant development standards including, but not limited to: minimum floor areas and width for kitchens, floor to ceiling heights, bedrooms public open space, private and communal space, play space, safety and security, acoustic and privacy standards, which must also be complied with are set out below and within the ~~Apartment Guidelines~~ Apartments Guidelines (2025).

Table 12.21: Minimum Standards for Apartments

Type Of Unit	Apartment	Private Open Space	Communal Open Space	Storage
Studio	~~37~~ 32 sq m	4 sq m	4 sq m	3 sq m
One Bedroom	45 sq m	5 sq m	5 sq m	3 sq m
Two Bedrooms (3 Persons)	63 sq m	6 sq m	6 sq m	5 sq m
Two Bedrooms (4 Persons)	73 sq m	7 sq m	7 sq m	6 sq m
Three Bedrooms (4 Persons)	76 sq m	7 sq m	7 sq m	6 sq m
Three Bedrooms (5 Persons)	90 sq m	9 sq m	9 sq m	9 sq m

Floor to Ceiling Height

In line with SPPR ~~5~~4 of the ~~Apartment Guidelines~~ Apartments Guidelines (2025), ~~ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.~~ ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality.

Lift and Stair Cores

In line with SPPR ~~6~~ 5 of the ~~Apartment Guidelines~~ Apartments Guidelines (2025), ~~a maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.~~ there shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.

Dual Aspect

Dual aspect apartments should have openable windows on two or more walls which provides a view in more than just one direction. The use of windows, indents or kinks on single external elevations, in apartment units which are otherwise single aspect apartments, is not considered acceptable and / or sufficient to be considered dual aspect and these units, will be assessed as single aspect units. Preferably, the windows may be opposite one another, or adjacent around a corner. In line with SPPR ~~4~~3 of the Apartment Guidelines the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- ~~There shall be a minimum of 33% dual aspect units required in more 'central and accessible urban locations', where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage,~~
- ~~In 'suburban or intermediate locations' it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme,~~
- ~~For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to~~
- A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.
- For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

And the following should be considered as part of design:

- Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable,
- North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature,

→ Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings

Amend second bullet point under (ii) Design and Siting of Refuse storage …..' on page 518 as follows;

Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025),* Refuse storage for houses….'

Amend the proposed Amendment Ref. No. 63 within Appendix 1 Statement of Compliance of the County Development Plan as follows:

- Amend text under introduction:

The required statement pertaining to the South Dublin County ~~Council~~ Development Plan ~~2016 – 2022~~ 2022-2028 is as below under the following tables:

Table 1: List of Section 28 Ministerial Guidelines

Table 2: Implementation of SPPRs under the Building Height Guidelines

Table 3: Implementation of SPPRs under the ~~Apartment Guidelines~~ *Apartments Guidelines (2025)*

Table 4: Implementation of SPPRs under the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change

…

And include further amendments to relevant sections of Table 1: List of Section 28 Ministerial Guidelines as follows:

Table 1: List of Section 28 Ministerial Guidelines

Section 28 Guidelines	Implementation
~~**Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities (2020) – (Apartment Guidelines)**~~ **Planning Design Standards for**	Chapter 6 Housing and Chapter 12 Implementation and Monitoring have the relevant policies and objectives of these Guidelines and also comply with the SPPRs contained within

Apartments Guidelines for Planning Authorities, 2025	(See below Table 3 for SPPR compliance).

Amend table 3 of Appendix 1 as follows:

Table 3: Implementation of SPPRs under the ~~Apartment Guidelines~~ Apartments Guidelines (2025)

SPPR Number and Description	Implementation
~~SPPR 1:~~ ~~Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).~~ Specific Planning Policy Requirement 1 (A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms. (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of	A Housing Strategy and Interim HNDA has been prepared (See Appendix 11) and has demonstrated that there is a requirement to incorporate 30% 3-bedroom units, unless justified in order to cater for the housing needs of the existing and future population in the County. Policy H1 Objective 13 and Section 12.5.2 of Chapter 12 Implementation and Monitoring set out objectives and requirements in relation to mix. This complies with SPPR 1.

unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.	
~~SPPR 2:~~ ~~For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:~~ ~~• Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio type units;~~ ~~• Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;~~ ~~• For schemes of 50 or more units, SPPR 1 shall apply to the entire development;~~ ~~All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.~~ Specific Planning Policy Requirement 2 The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below: • Studio apartment (1 person)	Section 6.8 of the Housing Chapter and Section 12.~~5.8~~6.7 of the Implementation and Monitoring Chapter 12 relate to be building refurbishment schemes. The policies and standards set out in the Development Plan comply with SPPR 2.

• 1-bedroom apartment (2 persons) • 2 bedroom apartment (3 persons) • 2-bedroom apartment (4 persons) • 3-bedroom apartment (4 persons) 32sq.m 45 sq.m 63 sq.m 73 sq.m 76 sq. m • 3-bedroom apartment (5 persons) 90 sq.m The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.	
~~SPPR 3:~~ ~~Minimum Apartment Floor Areas:~~ ~~• Studio apartment (1 person) 37 sq.m~~ ~~• 1-bedroom apartment (2 persons) 45 sq.m~~ ~~• 2-bedroom apartment (4 persons) 73 sq.m~~ ~~• 3-bedroom apartment (5 persons) 90 sq.m~~ Specific Planning Policy Requirement 3 In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement. (ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.	Section 12.~~5.4~~6.7 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 3. The standards set out in of the Development Plan comply with SPPR 3.
~~SPPR 4:~~ ~~In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the~~	Section 12.~~5.4~~6.7 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 4.

	~~following shall apply:~~ ~~A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.~~ ~~i. In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.~~ ~~ii. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.~~ Specific Planning Policy Requirement 4 Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality.	The standards set out in the Development Plan comply with SPPR 4.
	~~SPPR 5:~~ ~~Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.~~ Specific Planning Policy Requirement 5 There shall be no requirement within statutory plans or within an individual	Section 12.~~5.4~~6.7 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 5. The standards set out in the Development Plan comply with SPPR 5.

	scheme in respect of a minimum number of units per floor per core.	
	~~SPPR 6:~~ ~~A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.~~ Specific Planning Policy Requirement 6 The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	Section 12.~~5.4~~6.7 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 5. The standards set out in the Development Plan comply with SPPR 6.

	~~SPPR 7:~~ ~~BTR development must be:~~ ~~a) Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long- term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;~~ ~~b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:~~ ~~i. Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance / repair services, waste management facilities, etc.~~ ~~ii. Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV / lounge areas, work / study spaces, function rooms for use as private dining and kitchen facilities, etc.~~ Specific Planning Policy Requirement 7	Section 12.~~5.5~~6.4 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 7. The standards set out in the Development Plan comply with SPPR 7.

	There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process.	
	~~SPPR 8:~~ ~~Specific Planning Policy Requirement 8 For proposals that qualify as specific BTR development in accordance with SPPR 7:~~ ~~(i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless~~	Section 12.~~5.5~~6.4 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 8. The standards set out in the

	~~specified otherwise;~~ ~~(ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;~~ ~~(iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and / or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.~~ ~~(iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes; (v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.~~ Specific Planning Policy Requirement 8 (A) (i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes. (ii) The minimum required area for a single study bedroom without en-suite facilities is 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities is 11.5 sq.m; and statutory plans	Development Plan comply with SPPR 8.	

may not set out minimum required areas that exceed the minimum required areas set out within this SPPR. (iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sq.m and 3.3 sq.m per person, respectively; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR. (B) Where any other requirement or restriction is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single student accommodation scheme.	
~~SPPR 9:~~ ~~There shall be a presumption against granting planning permission for shared accommodation / co-living development unless the proposed development is either:~~ ~~(i) required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or,~~ ~~(ii) on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits.~~	~~Section 12.5.56.4 of Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 98. The standards set out in the Development Plan comply with SPPR 98.~~

And to Amend a section in the new table (5) in Appendix 1 of the proposed Variation as follows:

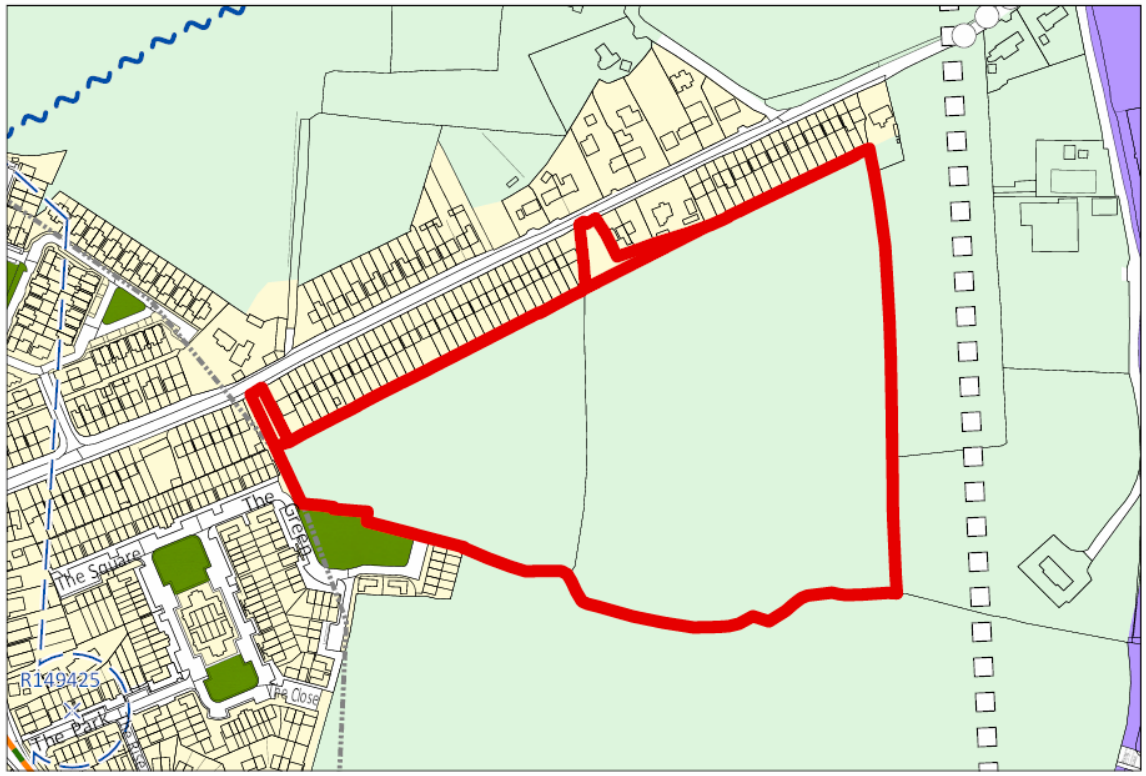
Table 5: Implementation of SPPRs under the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

SPPR Number and Description	Implementation
SPPR 2 - Minimum Private Open Space Standards for Houses: It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m 2 bed house 30 sq.m 3 bed house 40 sq.m 4 bed + house 50 sq.m A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves. Apartments and duplex units shall be required to meet the private and semiprivate open space requirements set out in the ~~Sustainable Urban~~	Chapter 12 Implementation and Monitoring sets the standards outlined under SPPR 2.

~~Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023~~ Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025 (and any subsequent updates). For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space. In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity. This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.		

3.3 Submission Proposals for Lands Outside the Variation

ALYMER ROAD (COMMONS LITTLE), NEWCASTLE



Submission No.

SD-C401-CDP25-1493 – Armstrong Fenton Ltd

Summary	CE Response
The submission was made by Armstrong Fenton Associates on behalf of Maplewood Residential for	This submission is seeking the designation of a rezoning of a 'Existing Residential' objective as part of proposed Variation no. 2 on

c.8.5 hectares of land in their ownership zoned 'RU' at Alymer Road, Newcastle to be designated as 'RES – Existing Residential.' The submission refers to two adjoining fields, the western of which is owned by Maplewood Residential and the eastern is owned by the Bennett Family (stated c. 16 acres), who have consented them to include their land as part of this submission. They proposed the rezoning of this site in their ownership from Objective 'RU' to Existing Residential 'RES' during the pre-draft non-statutory consultation. The submission outlines the viability of the site for inclusion in the proposed Variation in the context of proper planning and sustainable development, referencing figures from the Variation. • The land area is appropriate being they are positioned east of the town, between (and abutting) existing residential development and Greenogue Business Park, as opposed to much of the other development in Newcastle being to the southern side of Newcastle. • The lands represent the sequential approach to development in terms of the growth of Newcastle. • The lands are easily accessible, as both fields in the site have independent access onto Aylmer Road.	lands located off Alymer Road, Newcastle that are currently zoned Rural ('RU'). This submission is one of a number of submissions which have been made as part of public consultation requesting different lands in and around Newcastle to be rezoned to residential. The lands in question are a stated combined approximate 8.5 hectares, with the easternmost field being a stated 16 acres or 6.47 hectares. SDCC notes that the applicant also made a submission under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth in October / November 2025. **Newcastle Land Capacity Existing and Proposed** Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The Core Strategy of the adopted CDP, Table 11, set out a target of 398 units for Newcastle up to 2028. However, this did not account for all of the available zoned lands in Newcastle and was limited to accord with the targets relevant at that time and to ensure phased delivery of infrastructure and commensurate social infrastructure, retail, open space amenity and economic activity. Table 9 of the adopted CDP indicated the full capacity of the current zoned lands as 646 units.

It is stated that Newcastle is a Self-Sustaining Growth Town as per the current County Development Plan. The majority of existing zoned lands in Newcastle are committed, and that the lands at Ballynakelly are proposed to be zoned objective "RES-N" which will require the preparation of an approved area plan. It is also noted that of the c.19.5ha proposed for Ballynakelly, c.3ha is reserved to accommodate a secondary school and c.4.5ha is occupied by an unfinished below ground structure, leaving a net area remains of c.12ha that could potentially be developed for housing in the short term. Alternatively, they state that their clients' lands have no similar constraints and thus they propose that they be rezoned to land use 'RES,' which will allow for housing to be delivered in the short to medium term, as they are readily serviceable and developable. The submission notes that the subject site aligns with key policies and objectives, from the National Planning Framework First Revision (2025) and the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) which govern and guide the approach to zoning. It also reiterates tables and figures in the proposed Variation as they relate to Newcastle. • The submission refers to NPOs 7, 8, 12, 42 and 43.	Following the settlement capacity audit undertaken to inform this Variation, the revised Table 9 in the proposed Variation sets out the capacity of undeveloped lands in Newcastle likely to be developed within the current and subsequent Development Plans as 598 units. 166 of those units are estimated as being deliverable within the Development Plan period up to 2028 (Table 9.2). Additional provision has been identified in the proposed Variation for a further 350 units within Newcastle as Amendment no. 1, bringing the total capacity up to 2028 to 516 units on 25.2ha (Core Strategy Table 11). The remaining zoned lands are estimated to have the potential to accommodate a further 130 units, meaning that lands within Newcastle, four years after the adoption of the County Development Plan and significant development within that time, will be starting in 2026 with the same capacity of 646 units as it had in 2022. This will ensure a continued level of sustained growth during this County Development Plan and well into the next. **Compact, Smart, Sustainable Growth** The National Planning Framework (NPF) First Revision states their National Policy Objective (NPO 17) as: *In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:* • *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned*

• The site occupies an area of c.8.5ha, which aligns with the Compact Settlement Guidelines The site is located adjacent to the existing housing in the built area of Newcastle, within the built-up footprint of the wider Dublin area with proximate access to a wide range of services and facilities, including bus services. There are no impediments to accessing the site from the existing road network, nor to accessing the necessary water/waste-water infrastructural services, all of which can facilitate the development of this site for future housing. In addition, there are no known environmental sensitivities or impediments to developing the subject lands for housing. It is indicated that as the site falls within the 'City – Suburban/Urban Extension' category of density it could accommodate a minimum of 340 units which would be delivered by a known house builder. Taking all of the foregoing into consideration, it is put forward that zoning the subject lands on the southern side of Aylmer Road (in the townland of Commons Little), Newcastle for residential land use will contribute to the achievement of compact growth, given its location and context, and the quantum of units it is anticipated it can accommodate.	*population growth has to be in line with the overall growth target; and* • *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in the NPO 3 for the Eastern and Midlands region is 50% of new housing within Dublin City and Suburbs footprint and 30% of all new housing, elsewhere within existing urban footprints. Newcastle is classified under Metropolitan Towns and Villages (>1,500 population) and as such NPO 17 applies, and as indicated above is classified as a self-sustaining growth town. Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% positive change in growth between the years 2006 and 2022. As of the 2022 census, Newcastle had a population of 4,526 persons. Between Q3 2022 and the end of Q1 2026 (i.e. after the census in 2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (estimating an average persons per dwelling of 2.9 persons) suggesting a total population of approximately 5,500 persons. In relation to NPO 17, Newcastle has seen an increase of a further approximately 22% from the Census 2022 figures, this is below the 30% referenced in the NPO but alongside the existing lands and the proposed Variation Amendment no. 1, there is potential for growth to significantly exceed the 30% by 2028 or shortly thereafter.

The submission was accompanied by two reports on drainage services and roads infrastructure / services. On water, the report outlines the location of the nearest watermain along Alymer Road and the requirement for a pre connection agreement with UÉ, and the requirement for confirmation of costs for any upgrade on the planned capital works programme for the area. On wastewater, it is indicated that there is a trunk foul sewer traversing the site with a further smaller sewer along Alymer Road which connects to it. Again, a pre-connection agreement would be required. Surface water – it is indicated that there is a watercourse or part of along the southern and eastern boundaries of the site which could serve surface water outfalls. It is noted that the site is not identified as being within Flood Zones A or B. The Transport report sets out the location of the site in the context of the road network and public transport services. A medium to long term road's objective for Alymer Road upgrade in the County Development Plan is noted as is the 6 year roads objective for the Western Dublin Orbital Route to the east.	The lands identified as Amendment no. 1 in Newcastle are considered appropriate because of the brownfield lands they encompass and the ability to link the identified lands to open space amenity and to the reservation of a school site. The road constructed to access the unfinished brownfield site has been designed into the adjacent development and will cater for new development on the site. In this context, it is considered appropriate in the context of NPO 17. The Amendment lands also align well with the Development Plan requirement for an alignment of development with infrastructure and amenities and the adopted objective COS8 SLO1 to identify a school site for this catchment area. In addition, the Variation has been considered at a strategic level to accommodate the NPF revised targets both for short-medium term lands and for longer term capacity within the identified Future Strategic Long Term Development Areas. Therefore, while the submission suggests that brownfield is a constraint, the Planning Authority is of the view that the inclusion of brownfield within the lands for Amendment no. 1 - Newcastle in the proposed Variation is a key rationale for their inclusion and accords with NPO 17 outlined above and NPO 41, which prioritises the alignment of planned population growth with the provision of new schools on well-located sites within or close to existing built up areas, including in support of infill and brownfield development, and NPO 45 in an area which has already seen significant greenfield development. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan

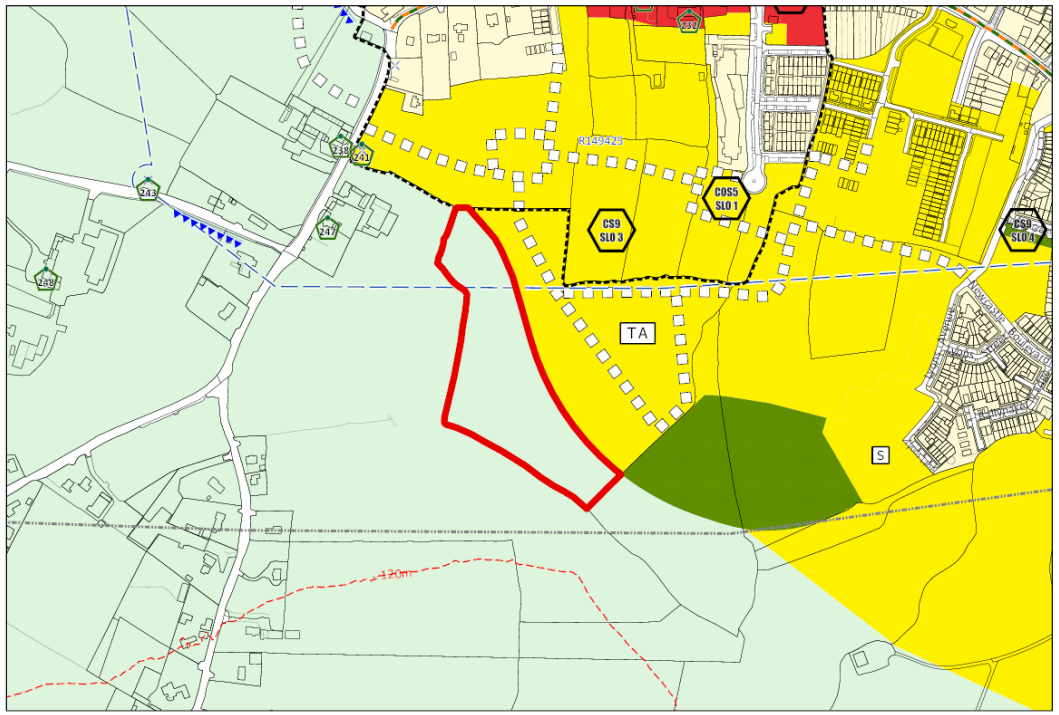
	period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings.

	This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity and clear identification of lands suitable for strategic long term development. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There are potential conflicts with some material assets of the Strategic Environmental Objectives (SEOs) due to poor connectivity to settlement. There is also risk for human health SEOs with the absence of safe walking. Though, there is a cycling provision currently. There is potential loss of central hedgerow in absence of mitigation, which appears to be historical, so there are potential adverse effects on Biodiversity, Flora and Fauna, cultural heritage and landscape SEOs.

	AA: Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** Flood Zone B is indicated within a small area of the site within the north west corner. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission are not required to meet the baseline targets or required for additional provision. Given that Newcastle has grown considerably under the Local Area Plan, 22% since the 2022 census alone, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. It is considered that this planned

	provision of growth and infrastructure is best met by the lands identified in Amendment no. 1 to the proposed Variation which already provide for additional provision and that no further lands are required as additional provision or otherwise.
CE Recommendation No change to the proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028.	

ATHGOE ROAD, NEWCASTLE



Submission No.

SD-C401-CDP25-1582 – Bluett & O'Donoghue

Summary	CE Response
The submission was made by Bluett & O'Donoghue on behalf of Fiona Murray for c.3.2 acres of land zoned 'RU' off Athgoe Road, Newcastle to be designated as residential.	This submission is seeking the designation of residential zoning objective as part of proposed Variation No. 2 on lands located off Athgoe Road, Newcastle that are currently zoned Rural ('RU').

The submission refers to their submission to the pre-draft non-statutory consultation and notes several submissions were received in relation to lands within Newcastle. They note that changes to the Proposed Variation now state the total potential additional land for Newcastle is 19.5ha. Given that SDCC included the 15ha site at Ballynakelly, Newcastle, they note that there is an additional 4.5ha required to reach full potential of 19.5ha. The submission outlines the viability of including the site at Athgoe Road in the proposed variation in the context of proper planning and sustainable development of the area. • The 3.2ha site is within range of the remaining 4.5ha of available capacity within Newcastle. • The site is adjacent to Cairn Homes Development, which would avoid leap-frog development and ensure compact growth. • The traffic and transportation firm, Roadplan, confirmed the site is accessible. • The site is withing 10-minute walking distance of 2 no. supermarkets, 2 no. schools, and 3 no. childcare facilities • The site is not located in or near a Natura 2000 site, Architectural Conservation Area, or within a SEVESO site. • The site has not been used previously for dumping/quarry. • The site is not within a Flood Zone.	This submission is one of a number of submissions which have been made requesting different lands in and around Newcastle to be rezoned to residential as part of the public consultation for Variation No. 2. The lands in question are a stated approximate 3.2 acres or 1.3 hectares in area. SDCC notes that the applicant also made a submission under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth in October / November 2025. **Newcastle Land Capacity Existing and Proposed** Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The Core Strategy of the adopted CDP, Table 11, set out a target of 398 units for Newcastle up to 2028. However, this did not account for all of the available zoned lands in Newcastle and was limited to accord with the targets relevant at that time and to ensure phased delivery of infrastructure and commensurate social infrastructure, retail, open space amenity and economic activity. Table 9 of the adopted CDP indicated the full capacity of the current zoned lands as 646 units. Following the settlement capacity audit undertaken to inform this Variation, the revised Table 9 in the proposed Variation sets out the capacity of undeveloped lands in Newcastle likely to be developed within the current and subsequent Development Plans as 598 units. 166 of those units are estimated as being deliverable within the

• There is no planning history on the site. • The submission submitted a water feasibility study by Uisce Éireann to assess the feasibility of providing 130 units plus a creche for 20 pupils and 4 staff, which they confirmed is feasible. The submission states that the site has a recommended density of 35-50 dph and could accommodate 112-160 homes, thus it would be feasible to accommodate another creche on the subject site if required. The subject sites' location could aid the provision of facilities to the adjacent development sites.	Development Plan period up to 2028 (Table 9.2). Additional provision has been identified in the proposed Variation for a further 350 units within Newcastle as Amendment no. 1, bringing the total capacity up to 2028 to 516 units on 25.2ha (Core Strategy Table 11). The remaining zoned lands are estimated to have the potential to accommodate a further 130 units, meaning that lands within Newcastle, four years after the adoption of the County Development Plan and significant development within that time, will be starting in 2026 with the same capacity of 646 units as it had in 2022. This will ensure a continued level of sustained growth during this County Development Plan and well into the next. It is noted that the submission has indicated that the potential additional land identified in the proposed Variation for Newcastle is 19.5 hectares. This is correct and is indicated in Table 10 of the revised written statement which outlines the capacity of additional zoned lands in the Variation. However, the submission misunderstands that while the total hectares of additional land zoned is shown, it is the potential units identified for those lands that goes to make up the additional capacity figures for the Variation. In this case, it is the identified 350 units identified within the lands as Amendment no. 1 which reflect the estimated net density capacity while the land area shown reflects the gross area (i.e. the total land area zoned). This methodology is set out in Appendix 2 (Part 3) of the proposed Variation. As such, there is no 'shortfall' in the additional provision as suggested in the submission. It should also be noted that this additional provision is on top of the capacity of the existing zoned land as outlined above. **Compact, Smart, Sustainable Growth** The National Planning Framework (NPF) First Revision states their National Policy Objective (NPO 17) as:

	In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to: • *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and* • *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in the NPO 3 for the Eastern and Midlands region is 50% of new housing within Dublin City and Suburbs footprint and 30% of all new housing, elsewhere within existing urban footprints. Newcastle is classified under Metropolitan Towns and Villages (>1,500 population) and as such NPO 17 applies, and as indicated above is classified as a self-sustaining growth town. Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% positive change in growth between the years 2006 and 2022. As of the 2022 census, Newcastle had a population of 4,526 persons. Between Q3 2022 and the end of Q1 2026 (i.e. after the census in

	2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (estimating an average persons per dwelling of 2.9 persons) and a total population of approximately 5,500 persons. In relation to NPO 17, Newcastle has seen an increase of a further approximately 22% from the Census 2022 figures, this is below the 30% referenced in the NPO but alongside the existing lands and the proposed Variation Amendment no. 1, there is potential for growth to significantly exceed the 30% by 2028 or shortly thereafter. Lands subject to Amendment no. 1 in Newcastle were identified based on the inclusion of brownfield lands within it, the existing access point to the unfinished development which has been designed into adjacent development and the ability to link the proposed residential zoning to open space amenity lands and provide for the reservation of a school site. In this context, it is considered to meet key objective of NPO 17, outlined above. The Amendment lands also align well with the Development Plan requirement to align development with infrastructure and amenities, while also facilitating the County Development Plan objective COS8 SLO1 to identify a school site for this catchment area. In addition, the Variation has been considered at a strategic level to accommodate the NPF revised targets both for short-medium term lands and for longer term capacity within the identified Future Strategic Long Term Development Areas within the County focused on areas which can deliver most efficiently on transport-oriented development. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF

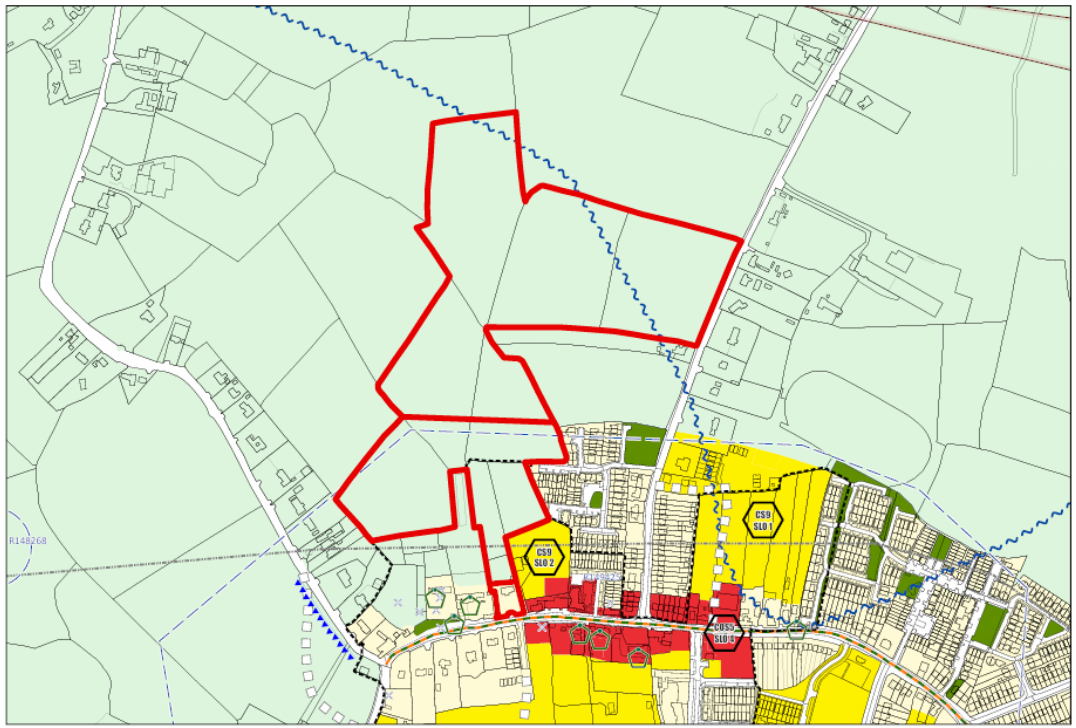
	Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review.

	Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity and clear identification of lands suitable for strategic long-term development. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of strategic environmental assessment, appropriate assessment and strategic flood risk assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There is potential conflict with population, human health and material asset Strategic Environmental Objectives (SEOs) given the distance and poor linkage to the existing settlement. There is potential for impacts on loss of hedgerow in absence of mitigation.

	AA: Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission have not been identified in the Variation as required in terms of meeting the baseline targets or being required for additional provision within Newcastle or at a county level. Given that Newcastle has grown considerably under the Local Area Plan, 22% since the 2022 census alone, it is important to ensure growth is measured and sufficiently aligned to the provision of planned

	infrastructure and amenities. For the reasons outlined above, it is considered that this is best achieved through the lands proposed in the Variation.
CE Recommendation No change to the proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028.	

Main Street / Peamount Road, Newcastle



Submission No.
SD-C401-CDP25-872 – SCA Planning

Summary	CE Response
The submission was made by Liam Butler and Deane & Deane Ltd. for c.17.4ha of lands in their ownership zoned 'RU' to the north of Main Street, Newcastle extending to meet the western side of Peamount Road. The lands referred to as being within the	This submission is seeking the rezoning of lands located to the north of Main Street Newcastle that are currently zoned Objective Rural ('RU') to New Residential 'RES-N' and lands in the wider ownership further to the north, extending to Peamount Road (R120) to be designated as

settlement boundary of Newcastle are sought to be designated as New Residential 'RES-N.' It is stated that the lands in the northern sector of the submission may be considered to be located outside the current identified development boundary of Newcastle and may be considered for longer-term strategic residential potential, to be addressed in future statutory development plan preparation. The submission outlines a number of objectives relating to the sustainable growth of Newcastle in the County Development Plan 2022-2028. It states Newcastle's growth was previously constrained by OPR commentary at draft plan stage of the County Development Plan, contrary to its designation as a Self-Sustaining Growth Town in a developing strategic employment area. The submission calls for reconsideration of Newcastle's growth capacity in light of National Planning Framework (NPF) revisions (2025) and planned public transport improvements, including the Hazelhatch DART+ extension, which has been granted permission with a projected service start in 2029. The lands are within 250m of the town centre, close to employment (within 3km), and represent sequential development consistent with the Compact Settlement Guidelines 2024 and Development Plan Guidelines 2022.	longer-term strategic residential under the Variation No. 2 of the South Dublin County Development Plan 2022-2028. This submission is one of a number of submissions which have been made as part of public consultation requesting different lands in and around Newcastle to be rezoned to residential as part of the public consultation for Variation No. 2. The lands are a stated 17.4 hectares (about 43 acres) in total. No breakdown in land area is provided for a split between RES-N and Long Term Strategic Development Area but based on the map provided the approximate area shown for proposed RES-N is c.4.93ha and for the SDA is c.12.47ha. It is noted that c.0.192ha of the site are already zoned RES and are within the RES-N lands requested. **Newcastle Land Capacity Existing and Proposed** Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The Core Strategy of the adopted CDP, Table 11, set out a target of 398 units for Newcastle up to 2028. However, this did not account for all of the available zoned lands in Newcastle and was limited to accord with the targets relevant at that time and to ensure phased delivery of infrastructure and commensurate social infrastructure, retail, open space amenity and economic activity. Table 9 of the adopted CDP indicated the full capacity of the current zoned lands as 646 units.

A phased delivery of CS9 SLO2 is noted: 'To *facilitate and commit to the delivery of Phase 1 residential lands at Burgage North to the north of St. Finian's Community Centre which reserve suitable lands to facilitate the extension of the existing community centre.'* These lands were permitted under Ref. SD 22A/0286 and were described in the ACP Inspector's Report (ACP Ref. 317595) as 'classic infill lands'. The lands in the submission are sequential to CS9 SLO2 and are centrally appropriate for development based on the Compact Settlement Guidelines 2024 and the Development Plan Guidelines 2022 and their development will infill a gap on the north side of Main Street Newcastle. The submission notes they are in RU agriculture zoning despite their prominent location in the town centre. It is noted that the lands are fully serviced, unconstrained by environmental, typographical and legal impediments, and are not subject to aeronautical restrictions. The submission is supported by an engineering report from POGA Consulting Engineers, which suggests that the lands can be serviced, indicating: - It is proposed that road access to the site will be via a new entrance from the Newcastle Main Street and Peamount Road.	Following the settlement capacity audit undertaken to inform this Variation, the revised Table 9 in the proposed Variation sets out the capacity of undeveloped lands in Newcastle likely to be developed within the current and subsequent Development Plans as 598 units. 166 of those units are estimated as being deliverable within the Development Plan period up to 2028 (Table 9.2). Additional provision has been identified in the proposed Variation for a further 350 units within Newcastle as Amendment no. 1, bringing the total capacity up to 2028 to 516 units on 25.2ha (Core Strategy Table 11). The remaining zoned lands are estimated to have the potential to accommodate a further 130 units, meaning that lands within Newcastle, four years after the adoption of the County Development Plan and significant development within that time, will be starting in 2026 with the same capacity of 646 units as it had in 2022. This will ensure a continued level of sustained growth during this County Development Plan and well into the next. **Compact, Smart, Sustainable Growth** The National Planning Framework (NPF) First Revision states their National Policy Objective (NPO 17) as: *In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:* • *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as*

- The road layout will be designed to meet the requirement of the DMURS. - Surface water from the site will be managed in accordance with SDCC SuDS Guidance Documents. - A potential new pumping station could facilitate connection to existing wastewater infrastructure. - It can connect into either the watermain on main Street or Peamount, as directed by Uisce Eireann. The submission concludes that the lands meet the criteria for sustainable sequential residential development in the short to long term and requests their consideration in Variation No. 2 of the SDCC County Development Plan.	*appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and* • *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in the NPO 3 for the Eastern and Midlands region is 50% of new city housing within Dublin City and suburban footprints and 30% of all new housing, elsewhere within existing urban footprints. Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% growth between the years 2006 and 2022. As of the 2022 census data, Newcastle had a population of 4,526. Between Q3 2022 and the end of Q1 2026 (i.e. after the census in 2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (e.g. units multiplied by average household size of 2.9 persons) suggesting a current total population of approximately 5,500 persons. In relation to NPO 17, Newcastle has seen an increase of a further approximately 22% from the Census 2022 figures, this is below the 30% referenced in the NPO but alongside the existing lands and the proposed Variation Amendment no. 1, there is potential for growth to significantly exceed the 30% by 2028 or shortly thereafter. **Proposed New Residential** The submission suggests the rezoning of c.4.73ha of the site where it is to the rear of and has access to Main Street to RES-N, which does not

	include the c.0.192ha of RES zoning between the proposed RES-N and Main Street. It is noted that the site retains two access points, Peamount Road and Main Street, and in time, the lands sited to the rear of Main Street where RES-N zoning is proposedin the submission could be considered appropriate for development given their location and surrounding settlement pattern. However, at this time the lands are not required to meet the baseline targets or additional provision. Lands subject to Amendment no. 1 in Newcastle were identified based on the inclusion of brownfield lands within it, the existing access point to the unfinished development which has been designed in to adjacent development and the ability to link the proposed residential zoning to open space amenity lands and provide for the reservation of a school site. In this context, it is considered to meet key objective of NPO 17, outlined above. The Amendment lands also align well with the Development Plan requirement to align development with infrastructure and amenities, while also facilitating the County Development Plan objective COS8 SLO1 to identify a school site for this catchment area. In addition, the Variation has been considered at a strategic level to accommodate the NPF revised targets both for short-medium term lands and for longer term capacity within the identified Future Strategic Long Term Development Areas within the County focused on areas which can deliver most efficiently on transport-oriented development. **Strategic Development Areas**

	The submission also requests a designation of Future Strategic Long-Term Development Lands for lands within their ownership which lie directly north of the requested RES-N lands. These lands extend northwards from the rear of Main Street into open agricultural land and bound the Peamount Road (R120) north outside the existing settlement boundary of Newcastle. Variation No. 2 proposes 'Future Strategic Long Term Development Areas' (SDAs), which are long-term development lands for major urban regeneration and/or transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and alignment with significant investment in infrastructure and services. The existing SDAs in the County Development Plan and Future Long Term SDAs in the proposed Variation align with National Policy Objective 10 of the National Planning Framework (NPF) First Revision 2025 relating to Transport Orientated Development (TOD) which states: *National Policy Objective 10* *Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.* The proposed Future SDA at Adamstown South and West (Outer), Amendment no. 17, was identified as a future SDA having regard to its location on the rail line, with an existing station at Adamstown and planning approval for the infrastructure to serve DART+SW, to its scale

	and to the potential for infrastructure delivery alignment. The lands are also contiguous to the existing SDA in the CDP 2022-2028 namely Adamstown SDZ and to the associated infrastructure. The proposed Future SDAs at Newlands, Belgard Road and Grange Castle, are centrally located within the Dublin City and Suburbs settlement boundary. Newlands and Belgard Road are accessible to the Luas Red Line, supporting transport orientated development (TOD). However, the proposed SDA site in Newcastle is not well serviced by public transport and does not meet the intention of Future Strategic Long-Term Development Areas in the proposed Variation. The site is accessible by Bus 68 every 50-60 minutes, and therefore the site cannot be considered as having high-capacity public transport. While Dart+SW is planned to extend to Hazelhatch Station, the subject lands remain geographically removed from the station and there is no justification for the sought SDA designation on the lands at this time. Furthermore, the proposed Variation, as outlined above, has identified significant long-term lands focused on transport-oriented development sufficient to meet the development needs of the county up to 2040 and beyond. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity

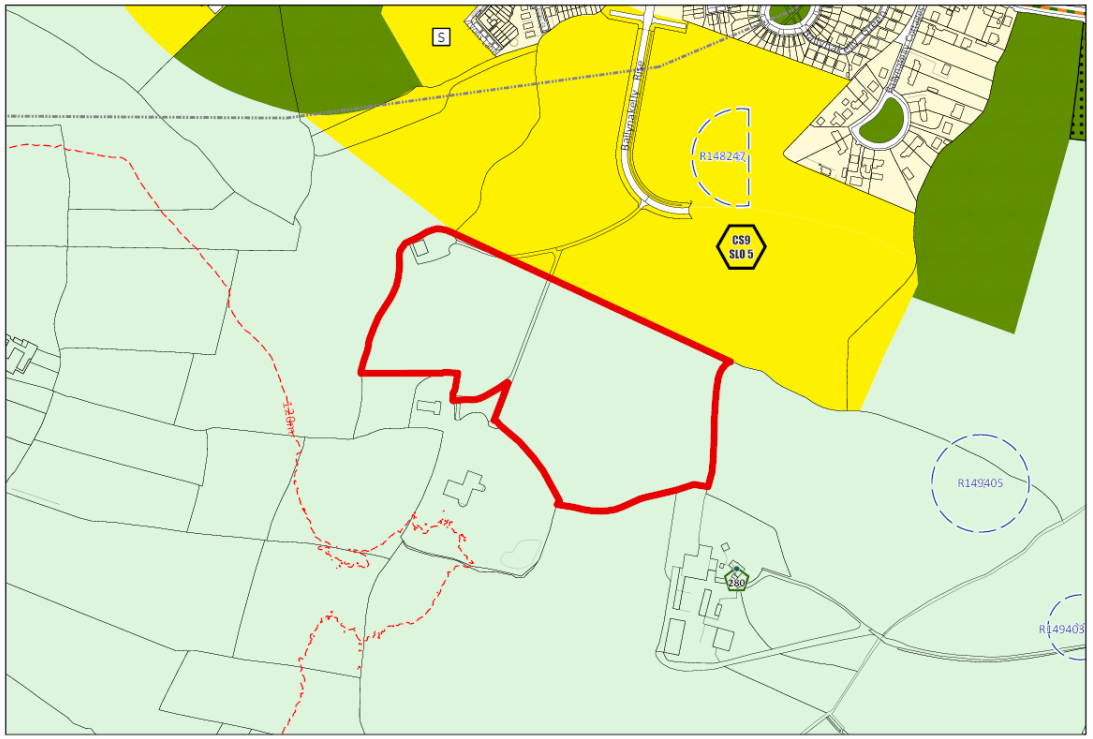
	for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613

	units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity and clear identification of lands suitable for strategic long-term development. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** The extensive area of land is northwest of the village of Newcastle, and there are potential conflicts in terms of transport Strategic Environmental Objectives (SEOs) and other material assets. The request relates to RES-N zoning for part of the lands closest to the village, which would support more sequential development. There is potential for adverse interaction on soil and geology SEOs given the agricultural land use, and due to there being some evidence of field patterns and hedgerows.

	AA: Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Strategic Future Long Term Development Areas have been identified as part of the proposed Variation No. 2, at Adamstown South and West (Outer), Newlands, Belgard Road and Grange Castle. These lands are centrally located within the Dublin City and Suburbs metropolitan area and align with NPO 10 of the NPF First Revision (2025) regarding the need for Transport Orientated Development.

	The lands proposed in this submission have not been identified in the Variation as appropriate nor necessary as short-medium term lands or for designation as Strategic Future Long Term Development Areas and are not required in terms of meeting the targets or being required for additional provision. Given that Newcastle has grown considerably under the Local Area Plan, 22% since the 2022 census alone, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities.
CE Recommendation No change to the proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028.	

SKYLARK, NEWCASTLE



Submission No.

SD-C401-CDP25-1430 – John Spain Associates

Summary	CE Response
The submission was made by John Spain Associates on behalf of Park Developments for c.10ha of land in their ownership zoned 'RU' at Skylark Hill, Newcastle to be designated as 'Future Strategic Long-Term Development Lands.'	This submission is seeking the designation of a rezoning of a 'Future Strategic Long-Term Development Lands' objective as part of proposed Variation no. 2 on lands located at Skylark Hill, Newcastle that are currently zoned Rural ('RU').

The submission refers to their submission to the pre-draft non-statutory consultation and welcomes the addition of the lands in their ownership at Ballynakelly being rezoned from Rural 'RU' to New Residential 'RES-N' and Open Space 'OS.' It also welcomes the introduction of Specific Local Objective (CS9 SLO5) on the RES-N zoned lands requiring the development to be in accordance with a masterplan including reservation of a school site and delivery of a public park. However, the submission requests that the c.10ha of proposed lands to the south of Ballynakelly, as part of their overall landholding, be rezoned to 'Future Strategic Long-Term Development Lands' due to the evolving legislative context and potential implications for the effective lifetime of the current Development Plan. The submission also seeks clarification of the relationship between the Settlement Capacity Audit and the quantum of lands identified under the Proposed Variation, in particular how the capacity figures identified in the SCA translate into the extent of lands proposed for residential zoning under the Variation. It is put forward that rezoning (sic) as 'Future Strategic Long-Term Development Lands' would acknowledge the lands' location immediately	This submission is one of a number of submissions which have been made as part of public consultation requesting different lands in and around Newcastle to be rezoned to residential as part of the public consultation for Variation No. 2. The lands in question are a stated approximately 10 hectares in area. SDCC notes that the applicant made a submission under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth in October / November 2025 and that a part of the overall land holding has been put forward for rezoning to RES-N as Amendment no. 1 to proposed Variation no. 2 to the County Development Plan. **Newcastle Land Capacity Existing and Proposed** Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The Core Strategy of the adopted CDP, Table 11, set out a target of 398 units for Newcastle up to 2028. However, this did not account for all of the available zoned lands in Newcastle and was limited to accord with the targets relevant at that time and to ensure phased delivery of infrastructure and commensurate social infrastructure, retail, open space amenity and economic activity. Table 9 of the adopted CDP indicated the full capacity of the current zoned lands as 646 units. Following the settlement capacity audit undertaken to inform this Variation, the revised Table 9 in the proposed Variation sets out the capacity of undeveloped lands in Newcastle likely to be developed

adjacent to areas proposed to be zoned RES-N under the Variation and their potential to contribute to the longer-term, plan-led growth of Newcastle as per the SLO 5.	within the current and subsequent Development Plans as 598 units. 166 of those units are estimated as being deliverable within the Development Plan period up to 2028 (Table 9.2). Additional provision has been identified in the proposed Variation for a further 350 units within Newcastle as Amendment no. 1, bringing the total capacity up to 2028 to 516 units on 25.2ha (Core Strategy Table 11). The remaining zoned lands are estimated to have the potential to accommodate a further 130 units, meaning that lands within Newcastle, four years after the adoption of the County Development Plan and significant development within that time, will be starting in 2026 with the same capacity of 646 units as it had in 2022. This will ensure a continued level of sustained growth during this County Development Plan and well into the next. **Strategic Development Areas** The submission requests a designation of Future Strategic Long-Term Development Lands for lands within their ownership which lie immediately to the south of proposed Variation Amendment no. 1, lands which are also in their ownership. Variation No. 2 proposes 'Future Strategic Long Term Development Areas' (SDAs), which are long-term development lands for major urban regeneration and/or transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and alignment with significant investment in infrastructure and services. The existing SDAs in the County Development Plan and proposed Future Long Term SDAs in the proposed Variation align with National Policy Objective 10 of the National Planning Framework (NPF) First

	Revision 2025 relating to Transport Orientated Development (TOD) which states: *National Policy Objective 10* *Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.* The proposed Future SDA at Adamstown South and West (Outer), Amendment no. 17, was identified as a future SDA having regard to its location on the rail line, with an existing station at Adamstown and planning approval for the infrastructure to serve DART+SW, to its scale and to the potential for infrastructure delivery alignment. The lands are also contiguous to the existing SDA in the CDP 2022-2028 namely Adamstown SDZ and to the associated infrastructure. The proposed Future SDAs at Newlands, Belgard Road and Grange Castle, are centrally located within the Dublin City and Suburbs settlement boundary. Newlands and Belgard Road are accessible to the Luas Red Line, supporting transport orientated development (TOD). **Compact, Smart, Sustainable Growth** The National Planning Framework (NPF) First Revision states their National Policy Objective (NPO 17) as: *In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:*

	• *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and* • *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in the NPO 3 for the Eastern and Midlands region is 50% of new housing within Dublin City and Suburbs footprint and 30% of all new housing, elsewhere within existing urban footprints. Newcastle is classified under Metropolitan Towns and Villages (>1,500 population) and as such NPO 17 applies, and as indicated above is classified as a self-sustaining growth town. Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% positive change in growth between the years 2006 and 2022. As of the 2022 census, Newcastle had a population of 4,526 persons. Between Q3 2022 and the end of Q1 2026 (i.e. after the census in 2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (estimating an average persons per dwelling of 2.9 persons) suggesting a total population of approximately 5,500 persons. In relation to NPO 17, Newcastle has seen an increase of a further approximately 22% from the Census 2022 figures, this is below the

	30% referenced in the NPO but given the existing zoned lands and the proposed Variation Amendment no. 1, there is potential for growth to significantly exceed the 30% by 2028 or shortly thereafter. Amendment no. 1 in Newcastle was primarily seen as appropriate due to the extent of brownfield lands it encompassed and the ability to link it to open space amenity lands and the reservation of a school site. In this context, it is considered appropriate under NPO 17 and to meet the three points within it as the objectives in the Development Plan already require an alignment of development with infrastructure and amenities and the need to identify a school site for this catchment area. In addition, the proposed Variation has been considered at a strategic level to accommodate the NPF revised targets both for short-medium term lands and for longer term capacity within the identified Future Strategic Long Term Development Areas within the County focused on areas which can deliver most effectively on the need for transport-oriented development. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit

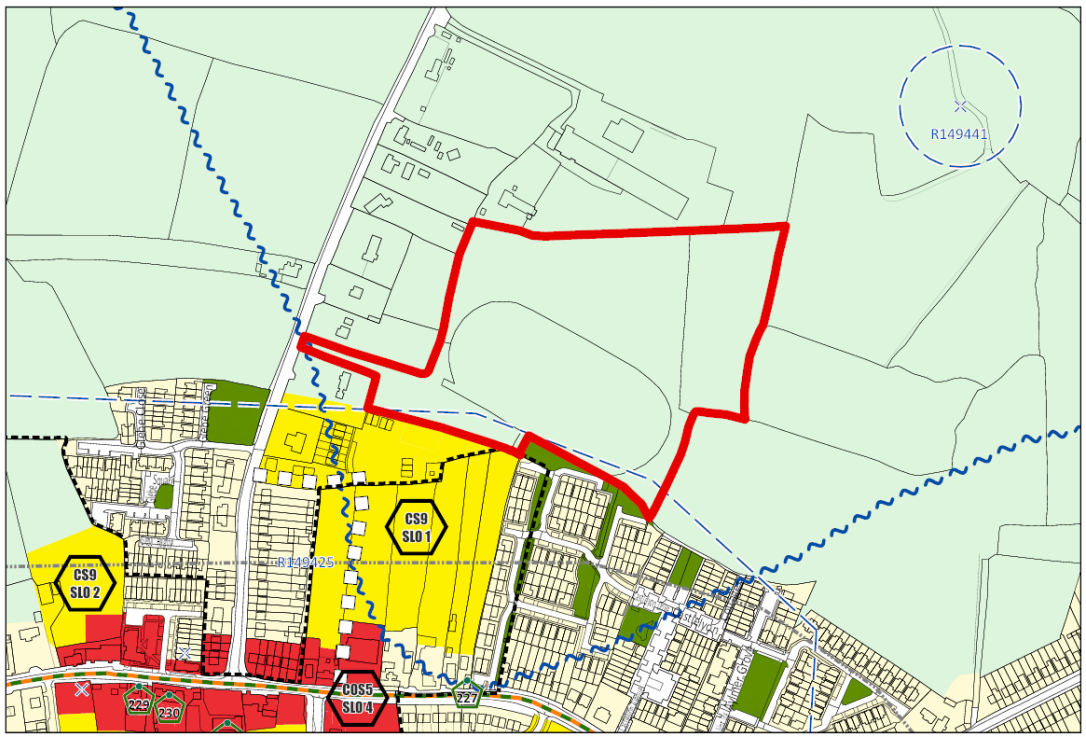
	(SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP.

	The content of the submission referencing the evolving legislative context is noted. However, given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity and clear identification of lands suitable for strategic future long term development. In relation to the clarification request, while the land areas outlined in the revised tables in the Written Statement are gross areas, the assessment of potential yield assumes a net developable area based on the typical range of 65-80% set out in the Compact Settlement Guidelines. This allows for the exclusion of parts of a site from the density calculations based on existing, or likely the need for, inter alia, strategic open space, ecological considerations, flood risk, strategic movement corridors, schools / community infrastructure where relevant, utilities and wayleaves, and any other site specific constraints identified through mapping and technical review. An understanding of the methodology used in the Variation is set out in Appendix 2 (Part 3) included with the Variation. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data.

	SEA: There are potential adverse effects on the Strategic Environmental Objectives (SEOs) relating to soil and geology. In the absence of mitigation, there is possible loss of linear woodland habitats, such as hedgerows and treelines. This may have adverse potential effects on Biodiversity SEOs. There is also uncertainty in interactions across material assets, such as services and transport-oriented development. **AA**: Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county.

	Strategic Future Long Term Development Areas have been identified as part of the proposed Variation No. 2, at Adamstown South and West (Outer), Newlands, Belgard Road and Grange Castle. These lands are centrally located within the Dublin City and Suburbs and Metropolitan Area and align with NPO 10 of the NPF First Revision (2025) regarding the need for Transport Orientated Development. Given that Newcastle has grown significantly under the Local Area Plan, including by a further 22% since the 2022 census, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. The lands proposed in this submission have not been identified in the Variation as appropriate nor necessary for designation as Strategic Future Long Term Development Areas and are not required in terms of meeting the targets or being required for additional provision.
CE Recommendation No change to the proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028.	

CORNERPARK (HAUGHANS FIELD), NEWCASTLE



Submission No.

SD-C401-CDP25-1406 – Alanna Homes Limited

Summary	CE Response
The submission was made by Alanna Homes (on behalf of Dragonglen Limited) and Peamount United Football Club for 7.22ha of land in their ownership zoned 'RU' at Cornerpark, Newcastle as being suitable to be included in the proposed Variation.	This submission is seeking the rezoning to 'New Residential' objective as part of proposed Variation no. 2 on lands located at Cornerpark, Newcastle that are currently zoned Rural ('RU').

The submission refers to their submission to the pre-draft non-statutory consultation, which they indicate is still relevant, and notes their concern that no meaningful process has been documented in respect of those lands either chosen, or not chosen, for inclusion in the proposed draft variation nor any reasons given for same. The submission states that if Ballynakelly lands are zoned as per the proposed Variation No. 2, and they have no objection to that, it is inconceivable that the Cornerpark lands would not also be zoned given the Variation lands: • Are more peripheral than those at Cornerpark • Would contribute to the unbalanced development of Newcastle by concentrating further development south and east of the village centre, • Contain no concrete proposal for planning gain. The submission outlines the advantages of including the Cornerpark lands within the proposed variation in the context of proper planning and sustainable development of the area. • The lands comply with the criteria set out in the Minister's Guidelines including being contiguous to the exiting built-up area on serviced lands upon which housing is capable of being delivered	This submission is one of a number of submissions which have been made as part of public consultation requesting different lands in and around Newcastle to be rezoned to residential as part of the public consultation for Variation No. 2. The lands in question are a stated approximate 7.22 hectares in area. SDCC notes that the applicant also made a submission under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth in October / November 2025. While SDCC notes the support of Peamount FC put forward in the submission, it should be noted that third party contracts are a civil matter and are not a planning matter. **Newcastle Land Capacity Existing and Proposed** Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The Core Strategy of the adopted CDP, Table 11, set out a target of 398 units for Newcastle up to 2028. However, this did not account for all of the available zoned lands in Newcastle and was limited to accord with the targets relevant at that time and to ensure phased delivery of infrastructure and commensurate social infrastructure, retail, open space amenity and economic activity. Table 9 of the

quickly which is the reason for the proposed variation i.e. to address the housing crisis and bring forward lands to address same. • The lands offer significant community gain to a voluntary not-for-profit community organisation which has been supported by the landowner through free use of the lands for a number of decades and will provide a sustainable basis for the Club going forward. • Newcastle has been deemed appropriate for the delivery of new housing and related facilities and services including amenities, creches etc. together with Part V plus social and affordable housing. • Both Alanna Homes and Peamount United FC have a proven track record in Newcastle through delivery of significant housing on the one hand and voluntary community work on the other. The history of Alanna in delivering housing in the Greater Dublin Area and within Newcastle is set out and it is indicated that they would intend to lodge a planning application in Q3 2026 should the lands be zoned. The submission originally made in the call for lands, included again in this submission to the proposed Variation, includes a letter from the chairperson of Peamount United, expressing support and outlining the membership and work of the club. The letter indicates that there is insufficient capacity on their current astro	adopted CDP indicated the full capacity of the current zoned lands as 646 units. Following the settlement capacity audit undertaken to inform this Variation, the revised Table 9 in the proposed Variation sets out the capacity of undeveloped lands in Newcastle likely to be developed within the current and subsequent Development Plans as 598 units. 166 of those units are estimated as being deliverable within the Development Plan period up to 2028 (Table 9.2). Additional provision has been identified in the proposed Variation for a further 350 units within Newcastle as Amendment no. 1, bringing the total capacity up to 2028 to 516 units on 25.2ha (Core Strategy Table 11). The remaining zoned lands are estimated to have the potential to accommodate a further 130 units, meaning that lands within Newcastle, four years after the adoption of the County Development Plan and significant development within that time, will be starting in 2026 with the same capacity of 646 units as it had in 2022. This will ensure a continued level of sustained growth during this County Development Plan and well into the next. **Compact, Smart, Sustainable Growth** The National Planning Framework (NPF) First Revision states National Policy Objective (NPO 17) as: *In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:*

pitches to accommodate new players and that the proposal with Alanna would present an opportunity for the club to benefit from new astro pitch and associated facilities on the lands. Alanna Homes have indicated that the landowner has entered into a legally binding commitment to transfer the subject lands to the Club. The 'call for lands' submission made by Alanna also includes detail on how the site meets with the criteria set out in the public notice, that it: • Contributes to the achievement of compact growth • Is within the built-up footprint of Dublin City and Suburbs and other existing towns • Is in an area that contributes to Transport-Oriented Development by virtue of good availability and proximity to high-capacity public transport • Is serviced or serviceable within the next five-year period • Is in an area with good social infrastructure and capacity in schools and community facilities or that can provide for the development of necessary social infrastructure • Supports the development of infill housing, housing on brownfield land and / or address vacancy and dereliction • Does not have significant challenges or impediments to the development of housing e.g. legal, environmental, topographical or servicing.	• *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and* • *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in NPO 3 for the Eastern and Midlands region is 50% of new housing within Dublin City and Suburbs footprint and 30% of all new housing elsewhere within existing urban footprints. Newcastle is classified under Metropolitan Towns and Villages (>1,500 population) and as such NPO 17 applies, and as indicated above is classified as a self-sustaining growth town. Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% growth between the years 2006 and 2022. As of the 2022 census, Newcastle had a population of 4,526 persons. Between Q3 2022 and the end of Q1 2026 (i.e. after the census in 2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (estimating an average persons per dwelling of 2.9 persons) suggesting a current total population of approximately 5,500 persons. In relation to NPO 17, Newcastle has seen an increase of a further approximately 22% from the Census 2022 figures, this is below the 30% referenced in the NPO but alongside the existing lands and the

The attached original submission includes a residential feasibility study and concept masterplan.	proposed Variation Amendment no. 1, there is potential for growth to significantly exceed the 30% by 2028 or shortly thereafter. A significant influence in identifying the lands within Amendment no. 1 in Newcastle was the inclusion of brownfield lands within it, the existing access point to the unfinished development which has been designed in to adjacent development and the ability to link the proposed residential zoning to open space amenity lands and provide for the reservation of a school site. In this context, it is considered to meet key objective of NPO 17, outlined above. The Amendment lands also align well with the Development Plan requirement to align development with infrastructure and amenities, while also facilitating the County Development Plan objective COS8 SLO1 to identify a school site for this catchment area. In addition, the Variation has been considered at a strategic level to accommodate the NPF revised targets both for short-medium term lands and for longer term capacity within the identified Future Strategic Long Term Development Areas within the County focused on areas which can deliver most efficiently on transport-oriented development. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery.

	The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030.

	The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity and clear identification of lands suitable for strategic long-term development. **Documentation Process** The comments made in relation to the documentation process for the call for lands and the Variation are noted. The Report to Councillors in October 2025 set out clearly the process that was undertaken for the Settlement Capacity Audit to identify the capacity of the existing lands and any further requirements. The Report, in section 6.3, outlined the criteria that would be undertaken to identify lands to meet the requirements of the revised NPF and associated Guidelines which were not zoned for development in the adopted County Development Plan. It was made clear that the assessment would follow the same criteria as used in the Settlement Capacity Audit but, given the need for new zoning such lands would require further analysis than already zoned lands, and additional assessment of other factors relating to deliverability, environmental / heritage sensitivities, physical constraints and social infrastructure would be included. To provide landowners with an opportunity to be involved in the process, SDCC put out a 'Call for Lands'. This non-statutory consultation made clear in the public advertising the criteria as follows:

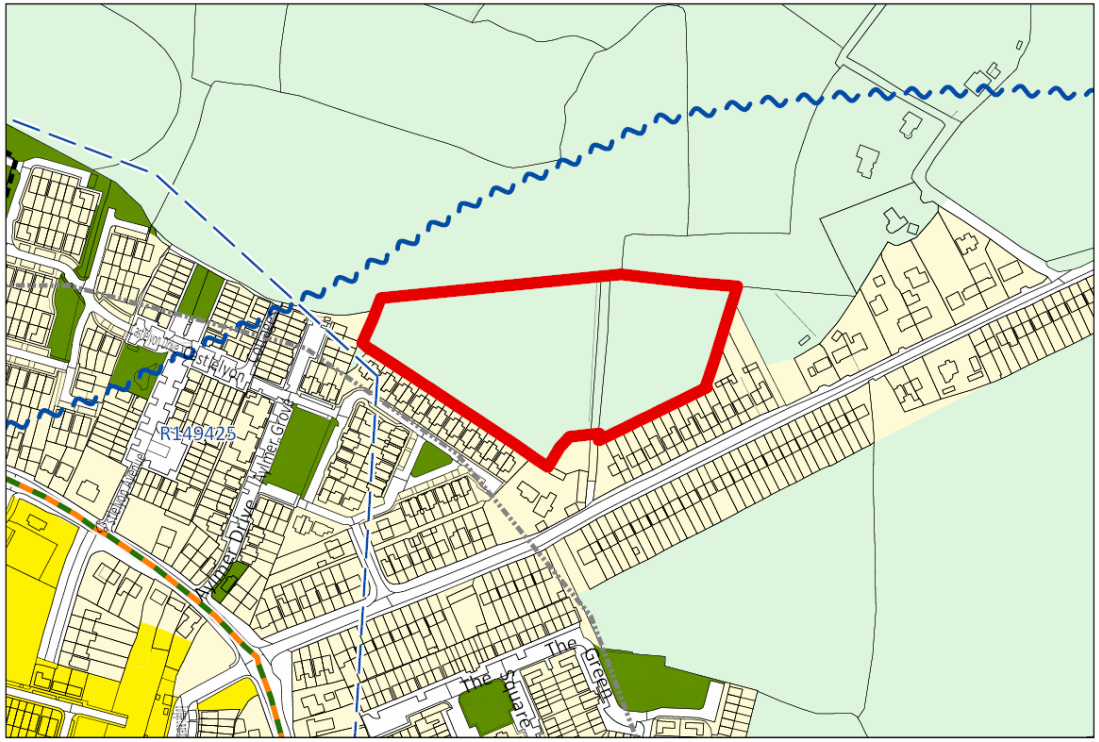
	SDCC is seeking proposals for lands or sites within its administrative area (with supporting information) that: • Contribute to the achievement of Compact Growth. • Are within the built-up footprint of Dublin City and Suburbs and other existing towns. • Are in areas that contribute to Transport-Oriented Development (TOD) by virtue of good availability and proximity to high-capacity public transport. • Are serviced or serviceable within the next five-year period. • Are in areas with good social infrastructure and capacity in schools and community facilities or that can provide for the development of necessary social infrastructure. • Support the development of infill housing, housing on brownfield land and/or address vacancy and dereliction. • Do not have significant challenges or impediments to the development of housing e.g. legal, environmental, topographical or servicing. The non-statutory consultation also made clear that there was no guarantee that any land included in submissions would be zoned for residential purposes. It was clearly indicated that '*Only lands that are considered suitable and necessary for residential zoning that sufficiently meet the above criteria, following analysis and assessment by SDCC, may be considered. Only the extent of land needed to meet the requirements of the Guidelines may come forward as part of a formal variation of the South Dublin County Development Plan 2022-2028. In this regard, sufficiently meeting the above criteria is not a guarantee that lands will come forward as part of a formal variation.*'

	The methodology and process is further set out in Appendix 2 (Part 3) which accompanied the Variation, with section 7 of the Appendix particularly relevant. Section 7 outlines the process undertaken to identify the most appropriate sites to meet the criteria and the NPF targets noting '*Only the scale of lands needed to fulfil the housing growth requirements and additional provision of up to 50% above the baseline target were brought forward*.' As indicated above, there is limited scope for rezoning within Newcastle given its significant growth in recent years and the fact that the existing capacity alongside Amendment no. 1 will increase growth over the 30%, starting from an already high growth level. Also as outlined above, the site proposed as Amendment no. 1 was considered to best meet key objectives in relation to housing, compact growth, schools and open space provision and at this time it would not be appropriate to zone further lands in Newcastle. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** A relatively large site these lands could potentially conflict with material asset Strategic Environmental Objectives (SEOs) given the absence of public transport, poor linkages to existing settlement and potential loss of limited hedgerow network. There is risk of conflict

	with population, human health, and climate change SEOs due to lack of viable public transport issues. It is uncertain if there is risk in relation to water and wastewater services. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Given that Newcastle has grown considerably under the Local Area Plan, 22% since the 2022 census alone, it is important to ensure

	growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. Amendment no. 1 is more appropriate for rezoning at this time due to the extent of brownfield lands it encompassed and the ability to link it to open space amenity lands and the reservation of a school site. The lands proposed in this submission have not been identified in the Variation as required in terms of meeting the baseline targets or being required for additional provision within Newcastle or at a county level. For the reasons outlined above, it is considered that this is best achieved through the lands proposed in the Variation.
CE Recommendation No change to the proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028.	

CORNERPARK, ALYMER ROAD, NEWCASTLE



Submission No.

SD-C401-CDP25-701 – Farry Town Planning Ltd.

Summary	CE Response
The submission was made by Farry Town Planning Ltd on behalf of Mr. Hugh Durkin for c.7 Acres of land in their ownership zoned 'RU' at Cornerpark, Newcastle to be designated as 'New Residential.'	This submission is seeking the designation of a residential zoning as part of proposed Variation no. 2 on lands located in Cornerpark, off and to the north of Alymer Road in Newcastle that are currently zoned Rural ('RU').

The submission for rezoning this site notes the revision of the National Planning Framework and the increased population and the ongoing national housing emergency which needs additional residential accommodate. It is indicated that while some dwellings can be built on brownfield or windfall sites, it is apparent that most will be on lands currently used for agricultural production purposes and that this will require an increase in zoned residential land. It is stated that the size and physical characteristics of the site make it eminently suitable for residential development, and they state they are unaware of any physical, environmental, or ecological factor outlined in the County Development Plan which would hinder against this form of development on the subject land. It would also accord with the national policy 'Development Plans - Guidelines for Planning Authorities'. The subject site is beside existing housing in Newcastle and is contiguous to residentially zoned land. Thus, the development of this land would represent the natural expansion of Newcastle without leap-frogging other farmland. The proximity of Newcastle to Rathcoole and Saggart and the juxtaposition of the subject lands with large employment / industrial facilities and the presence	This submission is one of a number of submissions which have been made as part of public consultation requesting different lands in and around Newcastle to be rezoned to residential as part of the public consultation for Variation No. 2. The lands in question are a stated approximate 7 acres or 2.8 hectares. SDCC notes that the applicant also made a submission under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth in October / November 2025. **Newcastle Land Capacity Existing and Proposed** Newcastle is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The Core Strategy of the adopted CDP, Table 11, set out a target of 398 units for Newcastle up to 2028. However, this did not account for all of the available zoned lands in Newcastle and was limited to accord with the targets relevant at that time and to ensure phased delivery of infrastructure and commensurate social infrastructure, retail, open space amenity and economic activity. Table 9 of the adopted CDP indicated the full capacity of the current zoned lands as 646 units Following the settlement capacity audit undertaken to inform this Variation, the revised Table 9 in the proposed Variation sets out the capacity of undeveloped lands in Newcastle likely to be developed

of technical infrastructure is indicated as facilitating residential development at this location.	within the current and subsequent Development Plans as 598 units. 166 of those units are estimated as being deliverable within the Development Plan period up to 2028 (Table 9.2). Additional provision has been identified in the proposed Variation for a further 350 units within Newcastle as Amendment no. 1, bringing the total capacity up to 2028 to 516 units on 25.2ha (Core Strategy Table 11). The remaining zoned lands are estimated to have the potential to accommodate a further 130 units, meaning that lands within Newcastle, four years after the adoption of the County Development Plan and significant development within that time, will be starting in 2026 with the same capacity of 646 units as it had in 2022. This will ensure a continued level of sustained growth during this County Development Plan and well into the next. **Compact, Smart, Sustainable Growth** The National Planning Framework (NPF) First Revision states their National Policy Objective (NPO 17) as: *In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:* • *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);* • *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and*

	• *A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.* The overall population growth target referred to in NPO 3 for the Eastern and Midlands region is 50% of new housing within Dublin City and Suburbs footprint and 30% of all new housing, elsewhere within existing urban footprints. Newcastle is classified under Metropolitan Towns and Villages (>1,500 population) and as such NPO 17 applies, and as indicated above is classified as a self-sustaining growth town. Newcastle's population has expanded rapidly in recent decades; there has been a 200.5% positive change in growth between the years 2006 and 2022. As of the 2022 census, Newcastle had a population of 4,526 persons. Between Q3 2022 and the end of Q1 2026 (i.e. after the census in 2022) there were 342 units completed in Newcastle, amounting to an increase of about 992 people (estimating an average persons per dwelling of 2.9 persons) suggesting a current total population of approximately 5,500 persons. Therefore, in relation to NPO 17, Newcastle has seen an increase of a further approximately 22% from the Census 2022 figures, this is below the 30% referenced in the NPO but alongside the existing zoned land capacity outlined above and the proposed Variation Amendment no. 1, there is potential for growth to significantly exceed the 30% by 2028 or shortly thereafter.

	Lands subject to Amendment no. 1 in Newcastle were identified based on the inclusion of brownfield lands within it, the existing access point to the unfinished development which has been designed into adjacent development and the ability to link the proposed residential zoning to open space amenity lands and provide for the reservation of a school site. In this context, it is considered to meet key objective of NPO 17, outlined above. The Amendment lands also align well with the Development Plan requirement to align development with infrastructure and amenities, while also facilitating the County Development Plan objective COS8 SLO1 to identify a school site for this catchment area. In addition, the Variation has been considered at a strategic level to accommodate the NPF revised targets both for short-medium term lands and for longer term capacity within the identified Future Strategic Long Term Development Areas within the County focused on areas which can deliver most efficiently on transport-oriented development. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by

	the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus

	on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity and clear identification of lands suitable for strategic long-term development. **Subject Lands** While there does not appear to be physical impediments, heritage, or flooding issues on the lands, other than ESB poles and lines at the access point and within the lands which could be overcome, as outlined above the land is not required for additional provision at this time. **SEA Preliminary Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There is potential for adverse interactions in terms of connectivity to services and other Material Assets. It appears to be good agricultural land under tillage, and there could be adverse effects on Soil and Geology Strategic Environmental Objectives (SEOs). Potential issues are public transport options, and potential traffic impacts on a relatively rural road. Development could generate adverse effects on

	landscape and biodiversity, with loss of field boundaries and trees fronting the road. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands at Cornerpark, Newcastle are designated as future potential lands under Variation No. 2. No, a Justification Test is required at this stage. The lands are confirmed as being within Flood Zone C per the SDCC CDP 2022–2028 Strategic Flood Risk Maps, and are not within the 1% AEP or 0.1% AEP HEFS extents. Mapping reviewed as part of the SFRA indicates an overland flow path approximately 70m northwest of the site; however, this does not intersect the subject lands. Should the lands be progressed for formal designation or zoning through a future plan-making process, the flood zone status should be reconfirmed against the then-current CDP flood zone mapping and OPW / HEFS outputs with any necessary updates reflected in the SFRA

	at that time. Any future planning application would require a site-specific FRA in accordance with Section 4.3 of the SFRA, including an assessment of pluvial and stormwater flood risk and a SuDS strategy consistent with CDP Policy IE3 Objective 2. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission have not been identified in the Variation as required in terms of meeting the baseline targets or being required for additional provision within Newcastle or at a county level. Given that Newcastle has grown considerably under the Local Area Plan, 22% since the 2022 census alone, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. For the reasons outlined above, it is considered that this is best achieved through the lands proposed in the Variation.
CE Recommendation No change to the proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028.	

CAVAN DEVELOPMENTS, RATHCOOLE

Submission No.
SD-C401-CDP25-1491 – Cavan Developments

Summary	CE Response
The submission from John Spain Associates on behalf of their client, Cavan Developments, requests a change of zoning on lands (12ha) located to the southwest of Rathcoole. It is stated that these lands	**Submission Proposal** This submission is seeking the rezoning of 6 hectares located to the southwest of Rathcoole that are currently zoned 'RU' (Rural) to 'RES-N' (New Residential), with a further 2 hectares currently zoned 'RU' to be

sit adjacent to the built-up area of Rathcoole and are well placed to provide for the future growth of the town.

The lands are subdivided into three areas; the breakdown is as follows:

Location	Site Area	New Zoning	Purpose
North	6ha	RES-N	New Residential Development
West	2ha	RES-N	New Community Centre
South	4ha	SRR	Safeguard Lands for Future Growth

The submission indicates that a new community centre is proposed to replace the old, dilapidated community centre on Green Lane and that this has been welcomed by Rathcoole Community Centre members.

The submission states that the lands are not zoned and contain a medium-long term road proposal through the site which can be accommodated by future development.

States also that Amendment no. 13 is the only land proposed in Rathcoole, this is insufficient to meet the growth needs of the town during the Development Plan period (which could be extended). States that of the 7,926 additional developments rezoned to RES-N with a new community centre and to rezone a further 4ha from 'RU' to 'SRR' (Strategic Residential Reserve) under Variation No. 2 of the South Dublin County Development Plan 2022-2028. In total, it is seeking the rezoning of 12 hectares of land, 10 hectares of which lie on lands between Stoney Hill Road and Green Lane, the additional 2 hectares proposed for a new community centre indicated to replace the old community centre lying to the west of Green Lane.

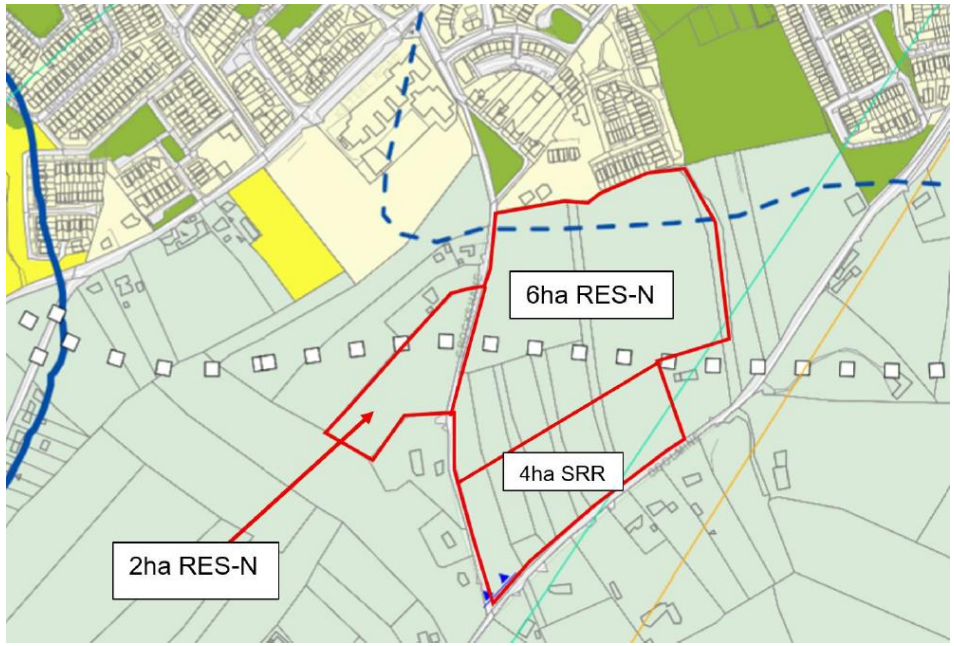


Image Extracted from Submission SD-401-CDP25-1491

Variation Context and Process

For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands

needed, at least 3% of this should be allocated to Rathcoole to distribute the growth evenly across the county. States that Amendment no. 13 lands were previously zoned residential in the 2016 Development Plan and was not brought forward for development. The submission states that the Chief Executive's Report references a density range of 40-80 dwellings per hectare and states that densities at the lower end of this range are most appropriate for Rathcoole and the subject lands. It is indicated that the lands are well serviced, well placed for development and meet NPF and RSES shared goals. Zoning these lands are in the interest of good planning and sustainable development and will ensure the continued delivery of sustainable housing in Rathcoole. States that Cavan Developments has previously delivered residential developments in Rathcoole and are presently completing a 98-unit residential development at Rathmill Manor, Rathcoole.	needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline

	target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Variation no. 2 and Rathcoole** Table 9 of the Written Statement in proposed Variation no. 2 sets out the capacity of undeveloped lands within Rathcoole likely to be delivered within the current and subsequent Development Plan periods. This identifies potential to accommodate 711 units / 21ha in total. Table 9.2 then identifies that 119 of these units are forecast to be delivered within the remaining period of the current Development Plan. Amendment 13 of the proposed Variation will release the 2-hectare strategic residential reserve designation on lands already zoned to the west of Rathcoole, providing for the release of another estimated 69 units up to 2028. This is reflected in the revised Core Strategy Table 11 with total capacity up to 2028 estimated as 188 units. Based on this, there is sufficient land remaining zoned after 2028 to accommodate a further 523 units. **Rathcoole Context**

	Rathcoole is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described in the Regional Spatial and Economic Strategy as containing '*a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining*'. Rathcoole's population has expanded rapidly in recent decades; there has been a 97.9% change in growth between the years 2006 and 2022. Based on the growth over the period and the further potential on the current zoned lands outlined above, which could accommodate an estimated additional 2,000 population, it is considered that Rathcoole has sufficient lands zoned within the context of a self-sustaining growth town and any further lands being identified for residential development would be excessive at this time and contrary to its categorisation as a self-sustaining growth town. **Submission Site Context** The lands are within an area which is very rural in character with lands rising to the south. The current road infrastructure reflects the rural character of the area being substandard bordered predominantly by high hedgerows along both Green Lane and Stoney Hill. The site itself comprises of greenfield lands which are dominated by agricultural use. Having regard to the baseline Ordnance Survey maps used at the time of the adoption of the County Development Plan, clear burgage hedgerows were indicated dividing the linear field pattern. This field pattern and burgage hedgerow would typically suggest significant historical and ecological value. However, it is noted that significant tree and hedgerow removal has taken place in recent times so that there now appears to be small amounts of treelines, scrub and hedgerows present, reflected in the preliminary SEA evaluation.

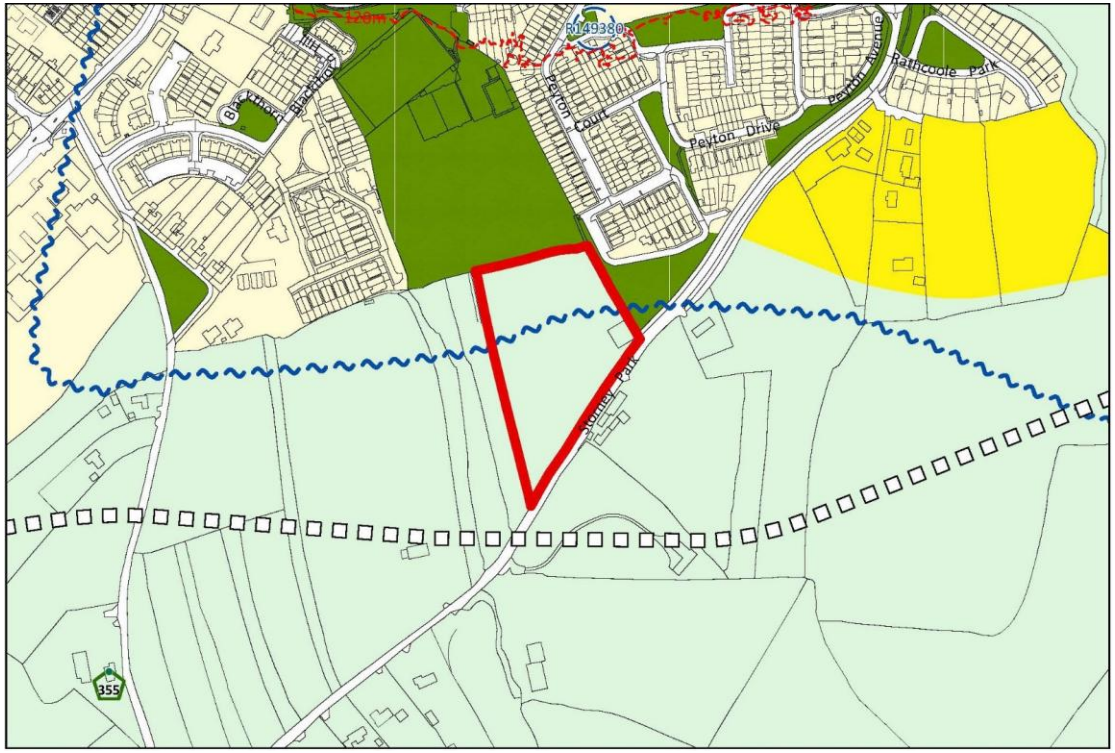
	While the County Development Plan includes an indicative road alignment running east-west through the site, in response to Specific Local Objective SM6 SLO 1 of the South Dublin County Development Plan 2022–2028 the Council is currently preparing a brief for a Transport Assessment and Transport Plan for the western area of the County. It is envisaged that the Transport Assessment and Transport Plan will be developed using an Area-Based Transport Assessment (ABTA) methodology, in accordance with TII and NTA guidance, and that one or more Local Transport Plans will be prepared. Subject to the final scope, the process is expected to include public consultation and will assess existing and future travel demand across all transport modes, review existing and planned transport infrastructure and services, identify the need for additional transport interventions, assess options including phasing and cost implications, and identify an integrated package of transport solutions. Having regard to same, appropriate solutions for the transport infrastructure to the west of the County, including this area, has yet to be determined. The proposal to facilitate a new community centre as part of the sought rezoning of 2 ha to RES-N at the location of the old community centre is noted. At this time, SDCC do not have plans to provide a new community centre at this location. A library hub within Rathcoole Courthouse that will provide core library services as well as supporting events, cultural activities and community-based programming is currently at design and fit out planning stage. The submission makes reference to the Chief Executive's Report and states Rathcoole has density range of 40-80 dwellings per hectare. It is unclear what Chief Executive's Report the submitter is referring to. However, as Rathcoole is identified as a 'Self-Sustaining Growth Town'

	and is within the Metropolitan Towns and Villages (>1,500 population) settlement category, the Compact Settlement Guidelines (2024) indicate a net density range of '35-50 dph shall generally be applied', and that 'densities of up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations'. The Compact Growth Settlement Guidelines defines an 'accessible location' as 'lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services'. It is not considered that this is an 'accessible' suburban location due to the accessibility issues outlined above including being bounded by remote rural roads and an absence of public transport and active travel facilities. See Table 5.1 of the Proposed Variation No. 2 Written Statement for reference. Given the site context, and the lack of potential for Transport Oriented Development, the lands put forward as a Strategic Residential Reserve are not considered to meet the requirements of a Future Strategic Long Term Development Area (SDA) which is the land type being identified in the Variation for future strategic lands. Once the Strategic Residential Reserve designation is removed from the lands to the west of Rathcoole, there will be no other lands within the County with this type of designation. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data.

	SEA: There are potential conflicts in terms of the Strategic Environmental Objectives (SEOs) for Biodiversity, Flora and Fauna due to the mix of habitats and presence of field boundaries that are intact and are of potential historical, cultural and ecological importance. Similarly, there is potential conflict with Soil and Geology, Landscape, and Cultural Heritage SEOs. There is also a potential conflict with some material assets due to poor connectivity to the settlement and risks for Human Health SEOs with the absence of safe walking and cycling provision currently. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation and land use activities arising from it, will not result in adverse effects on European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are not included in proposed Variation No. 2 as currently published and have not therefore been subject to an SFRA site-specific review at this stage. No Justification Test is required at this stage. The lands are confirmed as being within Flood Zone C per the SDCC CDP 2022–2028 Strategic Flood Risk Maps, and are not within

	the 1% AEP or 0.1% AEP HEFS extents. This is consistent with the position for the wider Crockshane / Rathcoole townland area, where the Crockshane Stream sits to the southeast and modelled flood extents do not encroach on the subject lands. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission have not been identified in the Variation as required in terms of meeting the baseline targets or being required for additional provision within Rathcoole or at a county level. Nor are the lands suitable for or required as a Future Strategic Long Term Development Area. Given that Rathcoole has grown considerably within recent Census periods, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. For the reasons outlined in the paragraphs above, it is considered that the release of the strategic residential reserve on lands already zoned by way of Amendment no. 13 of the proposed Variation are the only lands appropriate to release at this time in Rathcoole.
CE Recommendation No change to Variation No. 2 of the South Dublin County Development Plan 2022-2028.	

STONEY LANE, RATHCOOLE (Double Property)



Submission No.
SD-C401-CDP25-1001 – Brock McClure Planning and Development Consultants

Summary	CE Response
The submission from Brock McClure Planning and Development Consultants on behalf of their client, Double property Group Ltd., relates to a change of	**Submission Proposal** This submission is seeking the rezoning of c.2.15 hectares located to the west of Stoney Hill Road / Stoney Lane, Rathcoole, that are currently zoned 'RU' (Rural) to 'RES-N' (New Residential) under

zoning on lands located at Stoney Lane, Rathcoole to 'RES-N'. The submission states that their client previously made a related submission during the non-statutory public consultation stage of the process. Their previous submission, which is included within this submission, was supported by a masterplan, transport assessments and servicing assessments, all of which demonstrated that the lands are suitable, serviceable and capable of being delivered in a timely manner. The submission requests the council to revisit the proposed Variation to include the zoning of these lands, as the lands are a realistic and short-term delivery opportunity. States that the proposed Variation lands do not go far enough in unlocking realistic, deliverable residential opportunities within key growth settlements such as Rathcoole, and many of the proposed rezonings in the Variation offer a limited potential to facilitate significant development in the near future including Amendment Ref. 3, 7, 8, 10, 11, 12, 14, 15 and 22. For example: - Amendment Ref. 10 does not allocate new residential development, as development has already occurred on the site; - Amendment Ref. 11 is not suitable for residential development due to accessibility issues;	Variation No. 2 of the South Dublin County Development Plan 2022-2028. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken.

- Amendment Ref. 12 is not suitable as the site is zoned 'High Amenity Dodder Valley' and; - Amendment Ref. 22 is unsafe due to insufficient sightlines onto Edmondstown Road. The submission requests the council to also consider: - The missed opportunity to support the role of Rathcoole as a Self-Sustaining Growth Town to strengthen housing supply and contribute proportionately to meeting the revised NPF targets as there is an over-concentration of proposed rezonings within the Lucan, Adamstown and Finnstown areas. A more balanced spatial distribution of residential properties across the county is needed. - That development of the proposed site would consolidate the settlement boundary, reinforce the vitality of the village core, support local services and would align with Policy CS10 of the Development Plan. - That the lands are serviced (satisfies the criteria for Tier1 serviced/readily serviceable lands under NPO 101 and the NPF Implementation: Housing Growth Requirements 2025), connected, unconstrained and is capable of being integrated into the existing settlement.	When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Rathcoole Land Capacity Existing and Proposed** Rathcoole is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The submission states that Rathcoole is allocated growth of 1,339 persons / 487 residential units. However, these figures are derived from

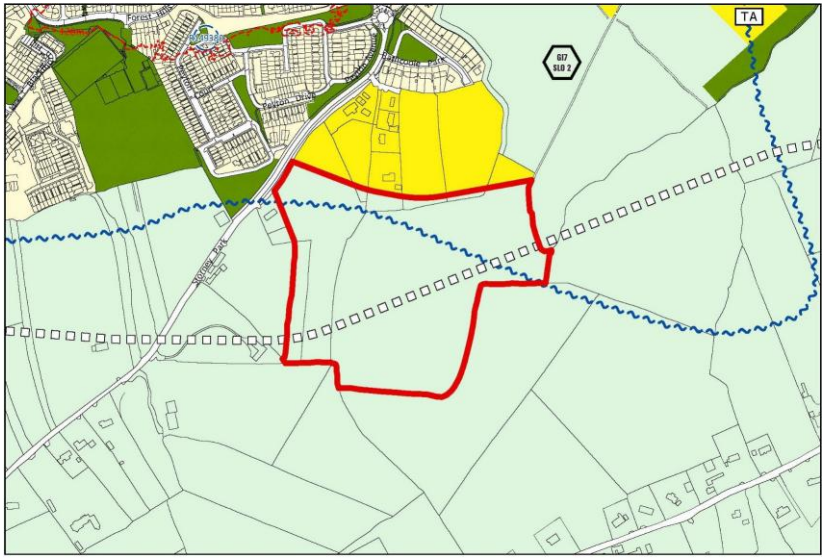
	the existing Core Strategy Table (Table 11) in the written statement, which is proposed to be replaced with an updated Core Strategy Table (New Table 11) under proposed Variation No. 2. For context, Table 9 of the Written Statement in proposed Variation no. 2 sets out the capacity of undeveloped lands within Rathcoole likely to be delivered within the current and subsequent Development Plan periods. This identifies potential to accommodate 711 units / 21ha in total. Table 9.2 then identifies that 119 of these units are forecast to be delivered within the current Development Plan period. Amendment 13 of the proposed Variation seeks to release the 2-hectare strategic residential reserve on lands already zoned to the west of Rathcoole, providing for the release of another estimated 69 units up to 2028. This is reflected in the Core Strategy Table 11 with total capacity up to 2028 estimated as 188 units. Based on this, there is sufficient land remaining zoned after 2028 to accommodate a further 523 units. It is noted that a Part X planning application is currently being prepared by SDCC with targeted submission to An Coimisiún Pleanála in June 2026. These lands are located further to the east and were zoned RES-N in the current County Development Plan. Rathcoole's population has expanded rapidly in recent decades; there has been 97.9% population growth between the years 2006 and 2022. Based on the growth over the period and the further potential on the current zoned lands outlined above, which could accommodate an estimated additional 2,000 population, it is considered that Rathcoole has sufficient lands zoned within the context of a self-sustaining growth town and any further lands being identified for residential

	development would be excessive at this time and contrary to its categorisation as a self-sustaining growth town. **Other comments / issues raised** The submission states that proposed rezonings in the Variation offer a limited potential to facilitate significant development in the near future. However, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity (see 'Variation Context and Process' heading above). For clarity, Amendment no. 10 was not included in the Variation figures. There are no accessibility issues in Amendment no. 11 that cannot be overcome, Amendment 22 is for a road upgrade, and sightline issues are not relevant and Amendment 12 already has an area of residential development and the rezoning provides an opportunity to rationalise the current layout and overcome other ongoing issues on the lands. The submission notes that a related submission was made under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities 2025. The relevant submission is SD-C388-CDP25-42. A criteria-based approach was adopted to the assessment of lands either identified by SDCC or identified to SDCC during a non-statutory consultation held in October/November 2025. The assessment focussed on: - The potential capacity of the lands to contribute to South Dublin's revised housing growth requirements and the 'additional provision' to provide for suitable flexibility; and - The planning and infrastructure assessment criteria used for the SCA, as referenced in Sections 2.6.2 and 2.6.3, as well as an "Other

	Suitability" category (relating to deliverability, specific social infrastructure and site constraints). Following the review process, lands were identified and proposed to be zoned. This site was not selected. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There is a potential conflict in terms of the Strategic Environmental Objectives (SEOs) with Population and Human Health, Material Assets and Climate Change due to the location of the proposed lands and poor linkages/connectivity to existing settlement of Rathcoole. Does not support transport orientated development via public transport provision. Potential loss of hedgerow on western boundary without mitigation. It is also noted that the Camac_020 is the nearest river 520m east of these lands and according to Water Framework Directive (WFD) data is of moderate status. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these amendments would need to be subject to appropriate assessment and consideration as part of the NIR of the proposed Variation. It is noted that the NIR of the proposed Variation identified

	conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation and land use activities arising from it, will not result in adverse effects on European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The site is not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission have not been identified in the Variation as required in terms of meeting the baseline targets or being required for additional provision within Rathcoole or at a county level. Given that Rathcoole has grown considerably within recent Census periods, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. For the reasons outlined in the paragraphs above, it is considered that the release of the strategic residential reserve on lands already zoned by way of Amendment no. 13 of the proposed Variation are the only lands appropriate to release at this time in Rathcoole.
CE Recommendation No change to Variation No. 2 of the South Dublin County Development Plan 2022-2028.	

STONEY HILL ROAD, RATHCOOLE (ROMEVILLE)



Submission No.
SD-C401-CDP25-1646 – Romeville Developments Ltd

Summary	CE Response
The submission from Foundation on behalf of their client, Romeville Developments Ltd., relates to a change of zoning to support residential development on lands (c. 10.2ha) located to the east of Stoney Hill Road, Rathcoole. The submission notes that the northern boundary of the site is subject to an LRD application for 176 no. dwellings. This LRD is currently at the appeal stage.	**Submission Proposal** This submission is seeking the rezoning of c.10.2 hectares located to the east of Stoney Hill Road, Rathcoole, that are currently zoned 'RU' (Rural) to support residential development under Variation No. 2 of the South Dublin County Development Plan 2022-2028. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in

The LRD application is designed in such a manner to allow for extension to the south into the subject lands of this submission. The submission provides information, including key policies and objectives, from the National Planning Framework First Revision (2025) and the Development Plan Guidelines for Planning Authorities (2022) which govern and guide the approach to zoning. The submission states that the Core Strategy identifies Rathcoole as a 'Self-Sustaining Growth Town' and is allocated, to 2028, an additional growth of 1,339 persons / 487 no. residential units. At a net density of 35 dwellings per hectare, the site has the potential to deliver c. 300 units which can make a significant contribution to the immediate future allocation requirements to the Rathcoole area until 2028 and any future allocations beyond that. The submission states Rathcoole has geographical and topographical constraints. Expansion to the north is limited by the N7, the east by Rathcoole Park and Woodlands and the west by commercial warehousing and quarrying. Given this, there is a natural shift for development to occur in the south. Almost all available residentially zoned land in the village has already been developed on since the adoption of the development plan and there is a need for more zoned land. The LRD represents a	the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review.

logical extension southward to the settlement. The Rathcoole area has a strong demand for additional housing. The submission states that council owned lands, identified for a Part 8, to the north-east of the subject site face development challenges including access and environmental challenges. As such, they are difficult to deliver and should be deferred from residential development and instead the subject site should be prioritised. The land is zoned 'RU' and the submission notes that a long-term road proposal traverses the southern part of the site. The site is well serviced, highly accessible, capable of being developed immediately and has significant green infrastructure potential. It would also be aligned with NPO 101 and NPO 43. The land has undergone a masterplan study by OMP Architects which incorporates the site with the LRD application. This study is attached to the submission.	Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Rathcoole Land Capacity Existing and Proposed** Rathcoole is identified as a 'Self-Sustaining Growth Town' in the County Development Plan based on past and targeted growth. Self-Sustaining Growth Towns are described as containing 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. The submission states that Rathcoole is allocated growth of 1,339 persons / 487 residential units. However, these figures are derived from the existing Core Strategy Table (Table 11) in the written statement, which is proposed to be replaced with an updated Core Strategy Table (New Table 11) under proposed Variation No. 2.

	For context, Table 9 of the Written Statement in proposed Variation no. 2 sets out the capacity of undeveloped lands within Rathcoole likely to be delivered within the current and subsequent Development Plan periods. This identifies potential to accommodate 711 units / 21ha in total. Table 9.2 then identifies that 119 of these units are forecast to be delivered within the current Development Plan period. Amendment no. 13 of the proposed Variation seeks to release the 2-hectare strategic residential reserve on lands already zoned to the west of Rathcoole, providing for the release of another estimated 69 units up to 2028. This is reflected in the Core Strategy Table 11 with total capacity up to 2028 estimated as 188 units. Based on this, there is sufficient land remaining zoned after 2028 to accommodate a further 523 units. Rathcoole's population has expanded rapidly in recent decades; there has been 97.9% population growth between the years 2006 and 2022. Based on the growth over the period and the further potential on the current zoned lands outlined above, which could accommodate an estimated additional 2,000 population, it is considered that Rathcoole has sufficient lands zoned within the context of a self-sustaining growth town and any further lands being identified for residential development would be excessive at this time and contrary to its categorisation as a self-sustaining growth town. **Submission Site Context** The lands are within an area which is rural in character. The current road infrastructure reflects the rural character of the area being substandard bordered predominantly by high hedgerows along Stoney Hill Road. The site itself comprises of greenfield lands which are dominated by

	agricultural use. The submission's reference to the green infrastructure potential is noted. However, the Council notes that significant areas of hedgerow have been removed from the lands which would undermine the ability to retain Green Infrastructure. The site has weak linkage to the existing settlement of Rathcoole, reflected in the preliminary SEA evaluation. In addition, there is a lack of active travel facilities and public transport servicing the site currently. The submission identifies that the lands contain a long-term road proposal. While the County Development Plan includes this indicative road alignment running east-west through the site, in response to Specific Local Objective SM6 SLO 1 of the South Dublin County Development Plan 2022–2028 the Council is currently preparing a brief for a Transport Assessment and Transport Plan for the western area of the County. It is envisaged that the Transport Assessment and Transport Plan will be developed using an Area-Based Transport Assessment (ABTA) methodology, in accordance with TII and NTA guidance, and that one or more Local Transport Plans will be prepared. Subject to the final scope, the process is expected to include public consultation and will assess existing and future travel demand across all transport modes, review existing and planned transport infrastructure and services, identify the need for additional transport interventions, assess options including phasing and cost implications, and identify an integrated package of transport solutions. Having regard to same, appropriate solutions for the transport infrastructure to the west of the County, including this area, has yet to be determined. **Other comments / issues raised** The submission makes reference to an LRD application to the north of the site which is designed in such a way to facilitate integration and interconnectedness with the proposed site in question. The LRD application was refused by South Dublin County Council in January

	2026 (Planning Ref. LRD25A/0008W). This decision has been appealed and is currently a live case that is under consideration by An Coimisiún Pleanála (Ref. ACP-324071-26). South Dublin County Council cannot comment on the matter at this time. The submission also makes reference to a Part 8, to the north-east of the subject site which faces development challenges. A Part 10 planning application is currently being prepared by SDCC with targeted submission to An Coimisiún Pleanála in June 2026. The Chief Executive notes that a related submission was made under the Non-Statutory Public Consultation for the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities 2025. The relevant submission is SD-C388-CDP25-15. A criteria-based approach was adopted to the assessment of lands either identified by SDCC or identified to SDCC during a non-statutory consultation held in October/November 2025. The assessment focussed on: - The potential capacity of the lands to contribute to South Dublin's revised housing growth requirements and the 'additional provision' to provide for suitable flexibility; and - The planning and infrastructure assessment criteria used for the SCA, as referenced in Sections 2.6.2 and 2.6.3, as well as an "Other Suitability" category (relating to deliverability, specific social infrastructure and site constraints). Following the review process, lands were identified and proposed to be zoned. This site was not selected. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were

	requested to provide a preliminary evaluation of the lands in the context of strategic environmental assessment, appropriate assessment and strategic flood risk assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There is a potential conflict in terms of the Strategic Environmental Objectives (SEOs) with Population and Human Health and Material Assets given the distance and weak linkage to existing settlement of Rathcoole. Also, supporting residential development would require clear-felling and potential Soil and Geology adverse effects on these SEOs. It is also noted that the Camac_020 is the nearest river flowing through the Eastern most point of these lands and according to Water Framework Directive (WFD) data is of moderate status. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these amendments would need to be subject to appropriate assessment and consideration as part of the NIR of the Proposed Variation. It is noted that the NIR of the Proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the Proposed Variation and land use activities arising from it, will not result in adverse effects on European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are designated as future potential lands under Variation No. 2. The subject lands are identified predominantly

	within Flood Zone C. However, there is a localised overlap with Flood Zones A and B along the eastern extent of the lands associated with the mapped floodplain. The subject lands are also identified as part of Site 163 within the SFRA, which is designated as Future Potential Development Lands. Given the extent and location of the mapped flood zones, further hydraulic modelling and site-specific flood risk assessment may be required to more accurately define flood extents and to inform any future zoning or development proposals. **Conclusion** South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission have not been identified in the Variation as required in terms of meeting the baseline targets or being required for additional provision within Rathcoole or at a county level. Given that Rathcoole has grown considerably within recent Census periods, it is important to ensure growth is measured and sufficiently aligned to the provision of planned infrastructure and amenities. For the reasons outlined in the paragraphs above, it is considered that the release of the strategic residential reserve on lands already zoned by way of Amendment no. 13 of the proposed Variation are the only lands appropriate to release at this time in Rathcoole.
CE Recommendation No change to Variation No. 2 of the South Dublin County Development Plan 2022-2028.	

BLESSINGTON ROAD, N81

Submission No.
SD-C401-CDP25-1123 – Ad Meliora Management Ltd

Summary	CE Response
The submission relates to a site at Blessington Road, Corbally, and is stated as 2 acres in size. The submission is accompanied by written statement from Ad Meliora Management Ltd and John Spain	**Site Context** The submission sets out the rationale to rezone the land rom RU (Rural and Agriculture) to RES-N (New Residential) or RES (Existing Residential) for new residential development.

Associates' submission that previously supported the non-statutory public consultation process relating to the 'call for lands' to inform the Variation process. The plan-led response to recent changes in National planning policy, namely the publication of the National Planning Framework First Revision and the publication of Ministerial Guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) is welcomed. It is stated that the subject site is brownfield (previously in use as a yard / service area associated with the adjacent industrial building). As such, the current RU zoning sterilises the site given its commercial/industrial history. It is further outlined that the site cannot be used for agricultural purposes or be viably remediated for other RU uses. **Rezoning** The submission outlines the planning rationale and justification for change of zoning from RU (Rural and Agriculture) to RES-N (New Residential) or RES (Existing Residential) for new residential development at the subject site, noting that this was also set out in the non-statutory consultation submission which accompanies this submission. The submission highlights that the site is strategically located, serviceable and immediately contiguous to the built-up area of Fortunestown /	The subject site is approximately 0.73 hectares and is situated along the N81. The site mainly comprises of hardstanding material with hedgerow / treelines occupying the edges of the site. Access to the site appears to be linked to the site to the west where hedgerow has been broken through within the site and an informal non-standard access evident adjacent to the main access to the western site along the N81. The western portions of the site are designated as Flood Zone B, while elements south west of the site is within a Flood Zone A area. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA

Jobstown, making it a suitable location for residential zoning and consistent with the principles of compact development and sustainable settlement. It is indicated that the site could potentially accommodate between 64 to 128 residential units, in line with the Sustainable Residential and Compact Settlement Guidelines. The submission states that the site would meet the following criteria: - Achieve Compact Growth - Within the built-up footprint of Dublin City and Suburbs. - In an area that would contribute to Transport-Oriented Development. - A site that is serviced/serviceable within the next five-year period. - In an area with good social infrastructure. - Support development of infill housing on brownfield land in an area where development is largely built-out. - The site does not have significant challenges or impediments. - Rezoning would align with national policy and with the criteria set out in South Dublin County Council's non-statutory consultation which sought proposals for lands or sites.	on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Scoring Assessment Response**

The submission suggests that a similar re-categorisation of this site at Blessington Road in the way that proposed Amendment no. 8, Kiltipper Road is proposed for rezoning would reflect the situation on the ground. **Scoring Assessment** The submission makes the case that the site was not accurately assessed under the criteria set out for SDCCs non-statutory consultation which sought proposals for lands and requests that SDCC reassess the subject site in consideration of the detailed points made in the submission. It is noted in the submission that SDCC provided the landowner (Ad Meliora) with the assessment of the site following the non-statutory consultation and this transparency was appreciated. The submission notes that the subject site was assessed alongside an adjacent site and states that this was not appropriate given that both parcels of land have widely diverging characteristics. It is indicated that this disadvantaged their site and did not provide for an accurate representation of their lands under the stated criteria. On this basis, the submission reviews all of the criteria and the related scoring, which was provided by SDCC, and revises upwards the scoring on the basis of it relating only to the subject site rather than amalgamated land parcels.	The review of the scoring assessment provided within the submission on the individual site is acknowledged. However, the purpose of the identification of lands for the Variation was to identify lands at a strategic level which would support the requirements set out above. Given such, the Planning Authority considered it appropriate to combine land parcels where lands were put forward for development. This allowed for an assessment of the lands which avoided piecemeal and ad hoc development, recognising that if sites were considered individually, they could potentially prejudice more comprehensive and cohesive development, whether now or in the future. In this case, submissions were made for the two adjoining land parcels in the 'call for lands' which together with the subject site provided the potential for more strategic, plan-led development. However, as a combined land parcel they did not score as highly as other lands which had been examined whether through the call for lands or otherwise by SDCC. When considering the assessment of the Part 2 – Infrastructure Criteria comments set out in the submission, the site has the potential to achieve Tier 2 status, however this alone would not alter the Chief Executive's recommendation not to rezone this site. The scoring set out in the submission for the individual site illustrates a potential for higher scoring on certain criteria. Nevertheless, given the ad-hoc nature of the site, flood zone issues and urban sprawl on lands to the south of the N81 and west of the built-up area, the individual site is not considered suitable at this time to support the suggested residential rezoning set out in the submission. **Zoning** Notwithstanding that the lands are currently vacant and brownfield, the suggested rezoning would result in ad hoc urban sprawl into land currently zoned as RU (Rural and Agriculture) failing to deliver the

In particular, it is put forward that the site was incorrectly classified as Tier 3 instead of Tier 2 due to an error in the assessment but in any event should have been classified as Tier 1. **Part 1 – Planning and Sustainable Assessment Criteria** The submission notes that the subject site passed under Part 1 criteria but suggests the score is higher. <u>Land within a specified residential or employment are within MASP</u> The submission highlights that the lands are located within the townland of Corbally and Fortunestown. It is further outlined that the Fortunestown is designated as Metropolitan Area Strategic Plan – Residential Growth Area. Therefore, the score should be higher under this criteria. <u>Proximity to Public Transport</u> The submission highlights that a bus is located 200m to the north of the site, providing access to Dublin City, Dun Laoghaire Dart Station, Tallaght Luas Station, and Dublin City Centre. As such the score for this criteria should be higher. **Part 2 – Infrastructure Criteria** The submission seeks to assess the site as Tier 1 status on a standalone basis. The lands can be connected to existing services and infrastructure in	objectives for a compact settlement. It is noted that the areas to the north of the site contain established residential settlement. However, the areas south of Blessington Road and west of Kiltalown Lane continue to comprise primarily of rural characteristics, rising south into the foothills. As such the current RU zoning on the site is considered appropriate given the sites relationship with the open nature of the lands further to the south of the site. On this basis, the site is not considered a continuation of Fortunestown or Jobstown, areas to the north of the N81. In terms of the comparison made in relation to the Amendment No. 8 – Kiltipper Road, it is considered that the site characteristics are very different, the Kiltipper site being immediately adjacent to existing large scale residential areas and able to integrate with them and the supporting amenities and facilities. **Flood Considerations** The western segments of the site are designated as Flood Zone B (Moderate Probability) while a portion of the site towards the southwest falls within Flood Zone A (High Probability). The Strategic Flood Risk Assessment supporting the current Development Plan highlights fluvial flooding from the Fortunestown River indicated in areas west of CRH De Selby Quarry to and across Blessington Road up until Fortunestown Road. The Planning System and Flood Risk Management Guidelines (2009) indicate that residential development in Flood Zone A and Flood Zone B areas is not appropriate. On this basis, any residential development would be vulnerable to flood risk where areas of the subject site are within these zones. The ad-hoc nature of the proposed zoning of this site would not facilitate a more efficient layout for development which

the area. The site is spatially sequential to the existing development lands, located to the north of the N81 and currently serviced. The submission is seeking an understanding how the site was scored as Tier 3 and stipulates that sites scoring 50% or more (250+) were deemed to be Tier 2 serviceable". SDCC scored the site at 52.8%. <u>Cycle Lanes Serving the Site</u> The submission highlights that Kiltalown Park is 200m away from the site. This includes a new cycle lane that runs adjacent to the N81 to Tallaght Town Centre. <u>Network Road Capacity</u> The submission responds to surrounding road network capacity criteria by stipulating that the upgrades are required to the N81 and if the provision of footpaths on one side of the road within the current site curtilage are considered minor upgrades, this can easily be provided as part of the development and would be typical. <u>Wastewater and Water:</u> The submission states that there is an existing foul sewer connection on the lands and therefore should score higher on wastewater criteria. The submission highlights that suggested site capacity (i.e. between 64 to 128 homes) would be within Uisce Éireann available capacity threshold and a connection already	would improve any outcomes for nature based solutions and residential amenity. As indicated above, to zone small sites such as this where other lands have come forward around it, would be ad hoc and potentially prejudicial to long-term planning. Should the site be brought forward, a full SFRA assessment will be required in accordance with the Planning System and Flood Risk Management Guidelines (OPW/DoEHLG, 2009), including: confirmation of flood zone status against the current Development Plan (2022) mapping and HEFS outputs; application of the Sequential Approach and, where relevant, the Justification Test; provision of a riparian corridor of at least 10m from top of bank as per Policy GI3 Objective 3 of the Development Plan (2022); and water-compatible zoning within Flood Zones A and B. **Policy** Reference is made to Objective 42 of the National Planning Framework 2025 and NPF Implementation: Housing Growth Requirements (July 2025). National Policy Objective 42 states: *To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.* As set out above, the proposed Variation amendments have identified sufficient lands to meet the targets apportioned to SDCC. The Planning Authority refers to National Policy Objective 8: *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.*

exists on the site. As such the site should score higher under water and wastewater criteria. <u>Surface Water:</u> The submission highlights that the site has an existing surface water connection and there is no record of drainage or flooding issues on site. Minor upgrades would be required for capacity and network facilities. As a result, it is highlighted that higher score should be included under this criteria. <u>Energy:</u> The submission questions South Dublin County Council's score of available capacity at substation within the settlement area. The submission suggests that there is no reason why ESB could not provide power for suggested development density at the site and higher score should be included under this criteria. **Part 3 - Suitability and Deliverability Assessment Criteria** The submission believes that the current assessment by SDCC is not accurate representation of the site. <u>Environmental/Heritage Sensitivities:</u> The submission states that the site does not overlap with a structure/feature on the Record of Protected Structures or the Record of Monuments and Places. The site is not within a riparian corridor. As such it is recommended within the submission to score this	It is considered that the lands identified in the proposed Variation better meet NPO8 in that they are within the existing built-up footprint and will better ensure compact and sequential patterns of growth. The Fortunestown LAP (2012-2018)/extended to 2022) is now superseded by the objectives and policy criteria set out within the South Dublin County Development Plan 2022. The subject site is not within Fortunestown and is significantly removed from some of the amenities mentioned, for instance Carrigmore Park. **Utilities and Infrastructure** It is acknowledged that there is potential for electricity connections on site and relevant water and wastewater connections. Uisce Éireann has indicated that there is a watermain in the road and a sewer located along the road approximately 60m to the east. **Community and Social Facilities** The submission highlights medical and childcare facilities within a 2km buffer from the subject site. A number of other amenities and facilities are noted in the submission, but it is noted that all of these are not easily accessed and would likely require travel by car. While there is active travel infrastructure along the N81, this is on the other side to the site and would require a co-ordinated approach with adjoining lands to provide for crossing points. **Traffic and Roads** It is noted that the site does not appear to have a current independent access to the N81, and that original access appears to have been through the adjoining site to the west. This latter access point still exists but the submission does not include this site. Having regard to

criteria higher. The submission believes that the score linked to Green Infrastructure elements should score higher on a brownfield post industrial site. The submission highlights that the site has no landscape character features and should score high on this criteria. The submission further questions the groundwater vulnerability of the site and would like to understand the geological, hydrogeological, and soil characteristics studies that inform an assessment of extreme vulnerability. <u>Physical/Other Constraints:</u> The submission identifies that the site is flat and there are no topographical challenges associated with the subject lands. It is also highlighted that there are no existing utilities and associated wayleaves affecting the subject lands. Therefore, it is suggested that the site should score higher under this criteria. <u>Social Infrastructure:</u> The submission states that Scoil Chaitlin Maude and St Thomas National School are less than 1km away from the site. In addition to this, Mount Seskin Community College is within 500m. The submission therefore recommends the site should score higher under this criteria.	the Spatial Planning and National Roads (2012) guidelines, it is considered likely that Transport Infrastructure Ireland would raise issues on the creation of a new and intensified access to support a residential development. It is considered that the proposal to rezone the site to residential use would have a detrimental impact on road safety on the N81, a national secondary road and impact the overall operational efficiency of this road network. Additionally, a petrol station entrance exists further west. This relationship raises further road safety concerns given the level of vehicle access points located along this portion of the N81. This current relationship also poses significant barriers in creating a suitable route for pedestrians to the bus stops located west. Cycle and pedestrian infrastructure is lacking considerably on this side of N81, and while they could potentially be delivered as part of development along the site, there are no on-going connections. This further demonstrates the unsuitable nature of the site to support development for multiple homes. On this basis, the upgrades are not considered minor, as suggested within the submission. **Public Transport** The site is located approximately 1.7km from the Fortunestown Red Line Luas stop, outside distances considered as accessible in planning guidelines. Bus stops served by the 65, 77A and S8 are located within close proximity of the subject lands. However, as identified above, the Chief Executive has significant concerns with the lack of current pedestrian routes to the bus stops and the creation of new routes could prove to be difficult given the number of vehicle access points to the west of the site and the limited extent of the subject lands to connect towards stops to the east.

<u>Parks:</u> The submission states that SDCC Development Plan and the Parks and Open Space Strategy refers to areas like Fortunestown/Jobstown having strong links to existing amenities capable of sustainable, high-density development due to adequate, planned infrastructure. The site is situated adjacent to parks and amenities including Kiltalown Park, Killinarden Park, Jobstown Park and De Selby Park. As a result, it is suggested that the site should score higher under this criteria. **Policy** The submission states that the rezoning of these lands to support residential development would comply with National Planning Framework (2025) Objective 42. The submission refers to the housing targets set out in the NPF Implementation: Housing Growth Requirements, published in July 2025, under Section 28 Guidelines directing local authorities to update housing targets in line with the Revised NPF. The submission seeks to demonstrate that the subject brownfield site offers suitable location for infill housing in line with national policies. The site's location supports the delivery of compact, sequential growth, in full alignment with National Policy Objective (NPO) 7 of the Revised NPF and the principles of the Compact Settlement Guidelines (2024).	In addition to this, the N81 directly west of the site currently contains no appropriate cycle lanes. Likewise, there are no cycle lanes on the N81 whilst moving in an easterly direction. As a result, residential development at the site would fail to meet the active travel goals of the County Development Plan (2022) in facilitating a 10-minute neighbourhood whilst factoring the connections to public transport. Residential development on site has potential to result in car dependency putting additional strain on the local road networks within the area. **Employment** The site is located within reasonable proximity to local employment hubs and additional residential would support the growth of these important enterprise areas, however this would not overcome the concerns raised in relation to the principle issues around ad hoc development, flooding matters and transport concerns. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment and Appropriate Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There are uncertain interactions for Material Assets in terms of wastewater and public transport access, potential issues in terms of residential development directly onto a national road that may create adverse interactions on the Strategic Environmental Objectives (SEOs) relating to Population and Human Health, in the absence of mitigation.

The submission refers to footnote 13 of the NPF and objectives 8 and 9 of the NPF. The submission states that suggested rezoning on the site would allow the subject-lands being infill and brownfield in nature, and immediately adjacent to and visually and functionally connected with the existing urban area. The site falls within a logical extent of the built-up footprint and would provide opportunity for compact growth. As the lands are brownfield / infill in nature, their reactivation would constitute sustainable development and adhere with the compact growth of the existing built-up area. The submission has set out an assessment against the criteria for Tier 1 Serviceable Land in line with NPF Appendix 3. Bringing the lands into active use would deliver tangible housing benefits while aligning with the Revised NPF, the Climate Action Plans 2024 and 2025, and the Circular Economy Strategy. Rezoning this site for residential development is consistent with national and local policy objectives that encourage the re-use of underutilised derelict sites. The submission refers to population analysis set out in the Fortunestown LAP (2012-2018 as extended). With the population growing from 9,838 no. persons in 2002 to 16,616 no. persons in 2011. The submission states that the 2022 Census Data	**AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The site in question was not one identified as having potential to deliver strategic housing development given its location and the rural characteristics of the lands to the south of the N81, the ad-hoc nature of the site and that the proposed rezoning could be detrimental to the potential for plan-led development in the future.

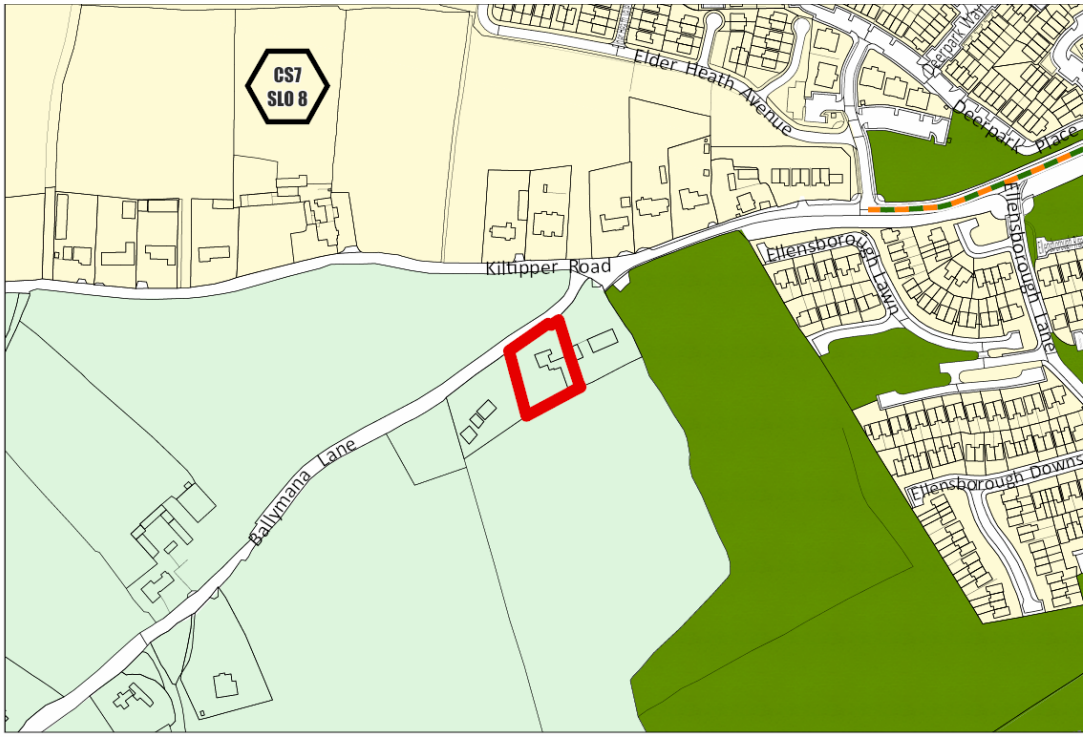
highlights a total population of 18,125, an increase of 9%. **Housing** The submission notes the housing delivery challenges facing SDCC and the subject site offers a short-term opportunity to deliver infill residential development, on a brownfield site, adjacent to existing road and services infrastructure. The subject lands provide an opportunity to deliver compact, sequential, and infrastructure-led residential development that will make a meaningful contribution to meeting future housing demand in the Dublin Metropolitan Area, while reinforcing Fortunestown's role as a sustainable, self-sufficient urban settlement. The submission demonstrates the status of the Res-N lands in the wider area and highlighting the majority of sites have been developed or subject to construction or with permissions at present. Therefore, the submission highlights that there is a need to identify residential lands in this area of South County Dublin to facilitate additional housing, particularly where infill and brownfield opportunities arise. **Utilities and Infrastructure** The submission highlights that the area is serviced by existing water, wastewater, and utility infrastructure,	

which can be extended to serve the subject site. The submission states that the site has an existing connection to the ESB Network, water and foul sewage. Therefore, the land is serviceable in the short-term for residential zoning. Appendix 1 of the submission includes a letter setting out payment confirmation for providing electricity connection. **Community and Social Facilities** The submission highlights nearby educational institutions such as Killinarden Community School and Mount Seskin Community College contribute to well-established educational infrastructure in the area, with Tallaght TUD located c. 3.5km to the east. Retail opportunities and services are readily accessible at Citywest Shopping Centre and The Square Tallaght. The submission sets out a preliminary assessment of existing essential social and community infrastructure within a 1-2km radius of the subject lands identifying a number of early childcare and educational facilities. The submissions states there is sufficient community infrastructure in the surrounding area to support residential development at the site. The submission highlights the proposed upgrade of Carrigmore Park, including new sports pitches, calisthenics areas, and enhanced pedestrian access,	

further strengthens the area's amenity offering and supports active lifestyles for residents of all ages. **Employment** The submission highlights that the Fotunestown / Jobstown area is located close to major employment hubs, such as Citywest Business Campus, Grange Castle, Baldonnell, and Magna Business Park. These businesses support significant job creation in the technology, logistics, and pharmaceutical sectors. This strategic positioning enhances the area's role as a live-work destination within South Dublin County. **Public Transport** The submission highlights that the site is located approximately 3 to 4 km from local Luas Red Line stops. A bus stop is approximately 200m to the north of the site. Access to the M50 is approximately 5km away via Tallaght. **Flood Considerations** The submission highlights that the lands east and west of the site are designated as Riparian Corridors and a small portion of it extends into the subject site which is a culverted portion of the River Camac. It is further outlined that the Riparian Corridor coincides with the extent of Flood Zone A and B. The submission states that given the site is largely outside the riparian corridor / flood risk mapping identified for the area, and the residential zoning of the subject site is therefore considered appropriate.	

The submission stipulates that the high-level modelling which informs the Strategic Flood Risk Assessment supporting the Development Plan is often not accurate and the extent of the Flood Zone A and B is probably less extensive than that illustrated on the maps. The submission highlights that the site has not experienced flood incidents in the past and no flood instances recorded further west. The relatively small portion of the eastern boundary of the site identified in Flood Zones A and B could be appropriately incorporated into the public open space provision, in accordance with the Planning System and Flood Risk Management Guidelines (2009).	
CE Recommendation No change to the proposed Variation no. 2 to the South Dublin County Development Plan 2022-2028.	

BALLYMANA LANE, ROBIN HILL



Submission No.
SD-C401-CDP25-917 – April Kerr

Summary	CE Response
The submission proposes the subject land at Ballymana Lane, Kiltipper to be rezoned as residential. The submission highlights that the site is	The subject lands comprise of an existing detached house within an area of stated 0.63 acres (0.25 hectares). The lands are zoned Rural (RU) and are located on the southern side of Ballymana Lane in

approximately 0.63 acres in a prime location for housing within close proximity to local amenities. The submitter has indicated that they would love for a developer to utilise this prime location to create much needed housing to the community.	proximity to the junction with Kiltipper Road. Kiltipper Park and football pitch borders to the south with detached houses on either side of the subject site in this rural location in the Dublin foothills. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in

	relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Subject Site and Characteristics** On the basis of the lands identified for the proposed Variation and the context outlined above, the requested rezoning from RU (Rural and Agriculture) to RES-N (New Residential) or RES (Existing Residential)

	for new residential development set out in the submission is not required nor is it considered appropriate. The overall size and scale of the site, located as it is between two other detached houses in this rural area, is ad hoc in nature and piecemeal. Located along a substandard rural road at Ballymana Lane the site would not support housing at a scale or density that would meet the strategic housing objectives of the Council. **Preliminary Environmental Assessments** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** There are potential adverse interactions in terms of connectivity to services and other material assets. The lands cover a small area and do not confirm to transport oriented development or sequential development and may interact adversely with Strategic Environmental Objectives (SEOs) for Population and Human Health. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and as such would be subject to an Appropriate Assessment with further consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR supporting the proposed Variation, identifies conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all

	necessary safeguards to ensure that the implementation of the proposed Variation and land use activities arising from it, will not result in adverse effects in European Sites. The subject lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The subject lands are not situated within Flood Zone A or B. In addition to this, the site is not located within a Riparian Corridor. Objective 1 of Policy IE4 (Flood Risk) of the Development Plan requires site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009). **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The site in question was not one identified as having potential to deliver strategic housing development and given its location and rural characteristics of the site, the rezoning of this site to support strategic housing development is not considered appropriate.
CE Recommendation No change to the proposed Variation no. 2 to the South Dublin County Development Plan 2022-2028.	

KILTIPPER, BALLYMANA

Submission No.
SD-C401-CDP25-1524 – DEREK WHYTE

Summary	CE Response
The submission requests the rezoning of two separate sites along Kiltipper Road and a further site south of Kiltipper Road and north of Ballymana Lane. The submission requests that the rezoning be taken into consideration in the context of and in	**Subject Sites and Context** *Barley Grove, Kiltipper, Road, Tallaght, D24CF67* The site is situated along Kiltipper Road and currently occupies a two storey residential property. The site measures approximately 0.2 hectares. Access is provided to the site via Kiltipper Road. The site is

addition to the zoning set out in Amendment Reference no. 8 (Kiltipper Road) of the proposed Variation No. 2 of the Development Plan (2022). The three suggested sites relate to the following addresses: - Barley Grove, Kiltipper, Road, Tallaght, D24CF67 - Teach n Mullaigh, Kiltipper Road, Tallaght, D24EEY4 - Castlefield, Ballymana lane, D24T9FE It is highlighted that the three local landowners of these sites have an interest in the proposed rezoning set out in Amendment no. 8 and would welcome consideration by South Dublin County Council to include these lands as part of the proposed rezoning set out in Amendment no. 8. **Zoning** It is suggested that the rezoning of the lands should be included as part of the masterplan for Kiltipper Road Amendment No.8 due to the spatial arrangement of the lands owned by Kelland Homes. The submission states that from a spatial planning perspective, unlocking Teach n Mullaigh D24EEY4 and Barley Grove D24CF67 is logical as both parcels of land adjoin the proposed rezoning lands. On this basis it is requested that these sites are taken into consideration.	currently zoned Rural and Agriculture (RU) but is included in proposed Amendment no. 7 Kiltipper Road to be rezoned to RES. *Teach n Mullaigh, Kiltipper Road, Tallaght, D24EEY4* The site is located along Kiltipper Road and occupies a two-storey residential property. The site is currently zoned as Rural and Agriculture (RU) but is included in proposed Amendment no. 7 Kiltipper Road to be rezoned to RES. *Castlefield, Ballymana lane, D24T9FE* The site relates to land located between Kiltipper Road to the north and Ballymana Lane to the south. The site contains an area of approximately 2.3 hectares and no built form occupies the land. A landscape supply business is situated further south-west of the lands. Pockets of established residential properties are positioned south west and a large parcel of agricultural land is situated to the south. The land is zoned as Rural and Agriculture (RU). **Zoning Requests** As noted above, both the Barley Grove, Kiltipper, Road, Tallaght, D24CF67 and Teach n Mullaigh, Kiltipper Road, Tallaght, D24EEY4 are within the boundary of the proposed rezoning associated with Amendment no. 8 (Kiltipper Road) to accommodate residential development. As such these lands are already subject to proposed rezoning from RU (Rural) to Existing Residential (RES). Therefore, the request to rezone these two properties is already included as part of a larger landholding within the Variation. **Variation Context and Process**

The layout of building lines, roads, footpaths and services would be welcomed to help unlock these backland areas to ensure that scarce land is not landlocked and can be utilised for residential development which will be consistent with the scale and pattern of development proposed for this area. The submission states that the lands relating to Castlefield, D24T9FE should be considered as possible proposed strategic reserve lands for housing development.	Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation also considered the need for longer term lands to facilitate delivery of housing targets up to 2040. These identified the amendments to include objectives for Future Strategic Long Term Development Areas (SDAs) at Adamstown South and West, Newlands, Belgard and Grangecastle with a focus on Transport Oriented Development (TOD). The zoning of these lands will be a matter for the next County Development Plan. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet: → The housing shortfall to meet the baseline targets for 2028 → Built-in additional capacity to meet the 2028 targets → The long-term housing needs of the county to 2040 and beyond **SDAs and the Subject Site** The submission has requested that an area of 2.3 hectares lying between Kiltipper Road and Ballymana Lane be designated as a strategic development area. Variation No. 2 proposes 'Future Strategic Long Term Development Areas' (SDAs), which are long-term development lands for major urban

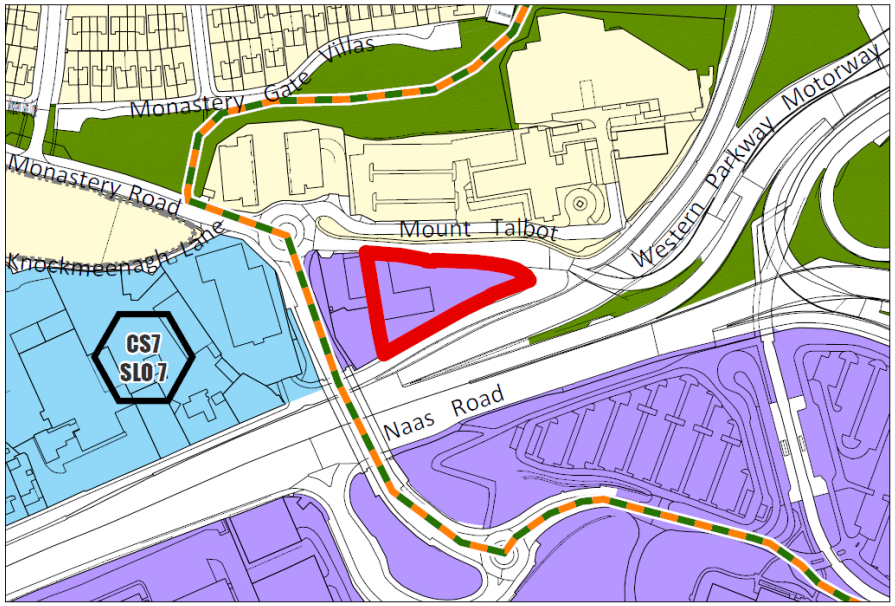
	regeneration and/or transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and alignment with significant investment in infrastructure and services. The existing SDAs in the County Development Plan and Future Long Term SDAs in the proposed Variation align with National Policy Objective 10 of the National Planning Framework (NPF) First Revision 2025 relating to Transport Orientated Development (TOD) which states: *National Policy Objective 10* *Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.* The proposed Future SDA at Adamstown South and West (Outer), Amendment no. 17, was identified as a future SDA having regard to its location on the rail line, with an existing station at Adamstown and planning approval for the infrastructure to serve DART+SW, to its scale and to the potential for infrastructure delivery alignment. The lands are also contiguous to the existing SDA in the CDP 2022-2028 namely Adamstown SDZ and to the associated infrastructure. The proposed Future SDAs at Newlands, Belgard Road and Grange Castle, are centrally located within the Dublin City and Suburbs settlement boundary. Newlands and Belgard Road are accessible to the Luas Red Line, supporting transport orientated development (TOD). However, the proposed SDA site, given its small scale and location to the south of Kiltipper Road is not well serviced by public transport and

	does not meet the intention of Future Strategic Long-Term Development Areas in the proposed Variation. Furthermore, the proposed Variation, as outlined above, has identified significant long-term lands focused on transport-oriented development sufficient to meet the development needs of the county up to 2040 and beyond. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA**: The Planning Authority's environmental consultant highlighted that a substantial amount of land was identified through the variation process (for example Amendment no. 8 Kiltipper Road) with mitigation included and additional greenfield lands being rezoned here are excessive. The Barley Grove and Teach n Mullaigh sites form part of Amendment no. 8 (Kiltipper Road) and as such was considered as part of the SEA supporting the proposed Variation No. 2. The SEA notes CS7 Specific Local Objective 8 requests associated with these lands acting as mitigation measures that will prevent, reduce, and offset as much as possible any significant adverse effects. **AA**: Given the potential presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening

	stage and these amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation No. 2. It is noted that the NIR supporting the proposed Variation No. 2, identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation No. 2 and land use activities arising from it, will not result in adverse effects in European Sites. The subject lands, would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from any future residential development at this location. **SFRA:** The subject lands are not situated within a Flood Zone A or B designation. In addition to this, the site is not located within a riparian corridor. Objective 1 of Policy IE4 (Flood Risk) of the Development Plan requires site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009). The parcels of land are confirmed as being within Flood C and are not within the 1% AEP or 0.1% AEP HEFS extents. No Justification Test would be required. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county.

	Barley Grove, D24CF67 and Teach n Mullaigh D24EEY4 sites both currently form part of the rezoning boundary associated with the Kiltipper Road (Amendment no. 8) rezoning variation from RU to RES. The Castlefield, Ballymana Lane (D24T9FE) lands were not identified as having potential to deliver strategic housing development given their small scale and more rural location to the south of Kiltipper Road. The lands do not meet criteria for transport-oriented development and do not meet the intention of Future Strategic Long-Term Development Areas in the proposed Variation.
CE Recommendation No change to the proposed Variation of the South Dublin County Development Plan 2022-2028.	

Leinster Motor Group, Monastery Road



Submission No.

SD-C401-CDP25-1487 – John Spain Associates

Summary	CE Response
The submission is made by John Spain Associates on behalf of Infinity ICAV which in turn is acting on behalf of its sub-fund Blacklion Real Estate Fund. The lands which are sought for rezoning are a site occupied by Leinster Motor Group at Monastery Road.	The submission relates to the site currently occupied by Leinster Motor Group at Monastery Road. It is part of a land parcel which lies adjacent to the Red Cow interchange, with Monastery Road and roundabout to the north, the L1019 and Joe Williams Bridge to the west and a slip road off the N7 to the south. The subject site contains a single storey sales and garage building with large areas of car parking. The parcel of

This submission welcomes the overall objectives of Proposed Variation No. 2, which is described as representing an important step in responding to updated housing growth requirements and aligning the Development Plan with national planning policy. **Rezoning Request and Reasons** Having regard to the evolving planning policy context in the area, it is requested that the employment 'EE' zoning of the subject site be reviewed. In particular, given the brownfield nature of the site and the zoning changes proposed on adjoining lands, including the proposed REGEN zoning under Amendment Ref. No. 9 (Knockmeenagh Framework Site) and the identification of lands to the south as 'Future Long-Term Strategic Lands', retaining the existing 'Objective EE' designation would result in the subject site becoming the only remaining parcel under this zoning within the immediate area, thereby creating an isolated land-use condition. **Planning History (adjoining sites)** In addition, a number of significant planning decisions in the immediate surrounding area, particularly to the north and west, are stated to provide important context regarding the evolving land-use pattern in this part of Clondalkin. Most notably, permission was granted by An Coimisiún Pleanála under ACP Ref. 314701-22 for a 115-unit Build-to-Rent apartment development on lands at the IBIS Hotel on Monastery Road, immediately north	land is also occupied by a number of small commercial businesses lying to the west of the Leinster Motors site. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken.

of the subject site. The scheme is described and it is put forward that the grant of permission for this scheme demonstrates the capacity and planning acceptance for higher-density residential development in proximity to the Red Cow Luas Stop and strategic transport infrastructure. Reference is also made to Ref. SD15A/0370, an application for the change of use of part of an industrial unit to a prayer centre on lands immediately west of the site. The refusal, subsequently upheld on appeal by An Coimisiún Pleanála, was based primarily on traffic and car parking capacity concerns associated with the location's strategic road function near the M50/M7 interchange, rather than the principle of community-related uses. Taken together, these decisions are stated to illustrate a gradual transition in the surrounding area, whereby lands historically characterised by employment or industrial uses are increasingly accommodating residential development and community-supporting functions, particularly within walking distance of the Red Cow Luas stop. **Clarification Request** Clarification is sought regarding the relationship between the findings of the Settlement Capacity Audit (SCA) and the extent of lands identified for residential zoning under the Proposed Variation.	When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Clarification Request** In relation to the clarification request, while the land areas outlined in the revised tables in the Written Statement are gross areas, the assessment of potential yield assumes a net developable area based on the typical range of 65-80% set out in the Compact Settlement Guidelines. As set out in Appendix 2 (Part 3) included with the Variation, this allows for the exclusion of parts of a site from the density calculations based on existing, or likely the need for, inter alia, strategic

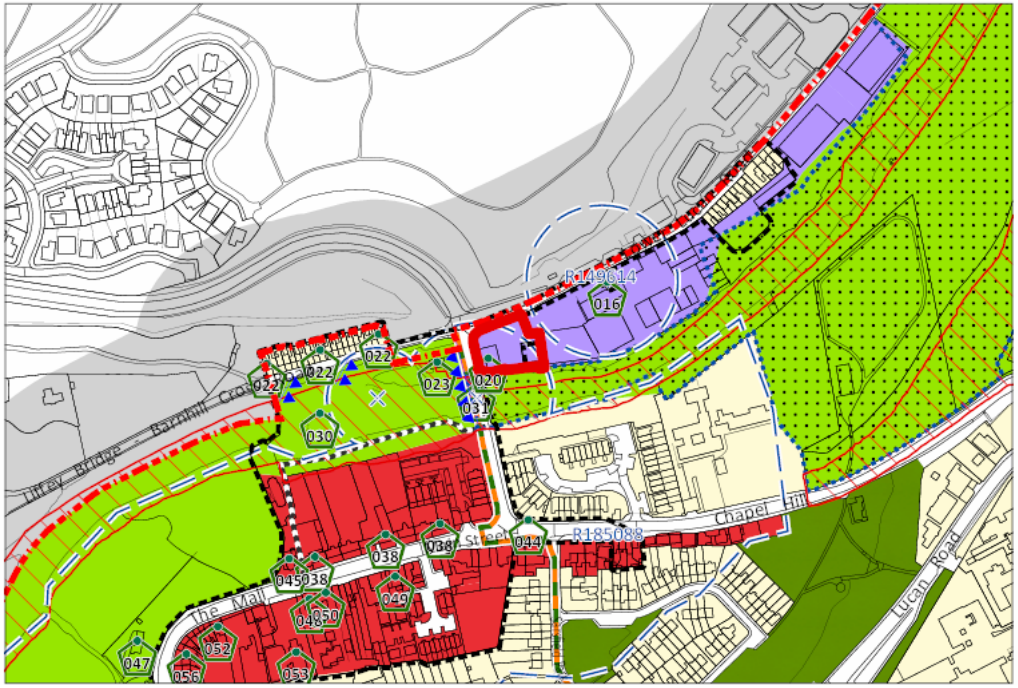
Having regard to the findings of the Settlement Capacity Audit, it would be helpful to better understand how the capacity figures identified in the audit translate into the overall extent of lands proposed for residential zoning under the Variation. Clarification on whether the land areas referenced represent gross site area or net developable land would assist in understanding the assumptions underpinning the overall housing capacity. This clarification would assist in understanding how the lands identified under the Variation respond to the housing capacity requirements outlined in the SCA, and whether any further lands may warrant consideration in this context. This distinction is particularly relevant given that the SCA explicitly refers to the use of net developable area in its methodology, excluding land required for open space, flood risk areas, schools, infrastructure and other non-developable elements. Greater clarity on how this methodology has been applied in the Variation tables would assist in understanding the density and capacity assumptions used in arriving at the overall housing yield. **Evolving Legislative Context** The General Scheme of the Planning and Development (Amendment) (No. 2) Bill 2025, published on the 14th of January 2025, introduces provisions which may allow planning authorities to extend the lifetime of the current six-year	open space, ecological considerations, flood risk, strategic movement corridors, schools / community infrastructure where relevant, utilities and wayleaves, and any other site specific constraints identified through mapping and technical review. This provision directly addresses the query raised in the submission around net and gross development areas. **Rezoning from EE to REGEN** The submission states that the subject site would remain as the only 'Objective EE' zoned parcel within the immediate area, thereby creating an isolated land-use condition. In this context the submission refers to the proposed REGEN zoning under Amendment no. 9 (Knockmeenagh Framework Site) and the identification of lands to the south as 'Future Long-Term Strategic Lands'. For clarification, these future lands will be subject to detailed examination of the most appropriate land use prior to any proposed rezoning. Their identification as 'Future Long-Term Strategic Lands' does not include for the rezoning of these lands as part of this Variation process. The variation documents clearly state that the current zoning of these lands is retained: RU – Rural, EE – Enterprise and Employment, OS – Open Space. Statements made in the submission around decisions on planning application relating to sites in the vicinity are noted. The decision to grant permission on the IBIS site, as referenced, conforms generally with the potential for higher-density development in proximity to public transport, in this case the Red Cow Luas. However, this does not create a precedent for residential development on the proposed site given its very different context, being a small isolated 'island' surrounded by a busy road network which includes the N7 and its associated slip road.

Development Plan. Should these provisions be enacted and subsequently availed of by South Dublin County Council, the preparation of the next Development Plan could potentially be deferred by up to 2.5 years. Against this evolving legislative backdrop, it is considered prudent that lands with clear potential to contribute to the longer-term residential growth of the County are appropriately recognised within the current Development Plan. Given the site's strategic location, its brownfield character, and the pattern of planning activity in the surrounding area, it is respectfully submitted that the change of zoning of the subject site to 'Objective REGEN' would more appropriately align the lands with the emerging planning framework for the area and support the coordinated regeneration of these lands.	Furthermore, the concerns raised by TII in relation to the adjoining lands at Knockmeenagh will also apply to this site. In this regard, it is noted that SD15A/0370 on the site adjoining the subject site (and within the same land parcel) related to the change of use from part of the ground floor and all of the first floor of unit 3 from light industrial to a place of worship and ancillary rooms. The application was refused by SDCC for a number of reasons including the constrained nature of the site, the nature of the surrounding road network, the lack of available car parking in part due to the busy nature of the existing light industrial uses on site. The decision was upheld on appeal by An Coimisiún Pleanála. **Relationship with Knockmeenagh Framework Site** The adopted Variation No. 1 to the County Development Plan included an analysis of lands in Knockmeenagh as part of the Clondalkin Local Planning Framework. The lands reviewed extended as far as the L1019 between Monastery Road roundabout and the Joe Williams Bridge. They did not extend further east to the lands subject to and adjacent to this submission. The analysis of the Knockmeenagh Framework lands undertaken for Variation No. 1 concluded that the lands would have a better opportunity to meet their full potential through the REGEN zoning allowing for the location of different use types to best effect to help overcome the issues around the existing road network. The proposed site is isolated and disconnected from adjoining lands, including the Knockmeenagh lands, by the adjoining road network. Given the isolated nature of the site surrounded by a busy road network at the Red Cow interchange and the hostile environment this would

	present to residential development it is considered that the site is more suitable to its current zoning for employment uses. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** This small brownfield area would interact positively in terms of the Strategic Environmental Objectives (SEOs) for Soil and Geology given its current brownfield condition. However, potential and likely adverse effects in the absence of mitigation relating to Air Quality and Noise SEOs and accompanying impacts on Population and Human Health SEOs given its location and proximity to the road network. **AA:** Given the potential presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and this amendment would need to be subject to appropriate assessment and consideration as part of the NIR of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation and land use activities arising from it, will not result in adverse effects on European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide

	appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The lands are confirmed as being within Flood Zone C per the SDCC CDP 2022–2028 Strategic Flood Risk Maps and are not within the 1% AEP or 0.1% AEP HEFS extents. No Justification Test would be required. **Conclusion** Given the constrained site area, cut off from adjoining lands by the busy nature of the surrounding road network at the Red Cow Interchange and the hostile environment this would offer to residential development it is considered that the proposed rezoning is not appropriate and that the current EE zoning should be retained.
CE Recommendation No change to proposed Variation no. 2 to the County Development Plan 2022-2028.	

LUCAN HILLS INDUSTRIAL ESTATE



Submission No.

SD-C401-CDP25-1143 – John Spain Associates
SD-C401-CDP25-1306 – Aishah Mohammed
SD-C401-CDP25-1511 – Aishah Mohammed

Summary	CE Response
Two submissions (duplicates) indicate the need for a place of worship / community centre for the growing multi-ethnic Muslim minority indicating that this will	The subject site is currently zoned as Enterprise and Employment (EE) having been rezoned from REGEN as part of the process of adoption of the County Development Plan 2022-2028. The protected structure

add to Lucan's inclusive and diverse community and there is currently nowhere to have it. They submission includes a previous councillor's objection to the proposed rezoning to EE from REGEN in 2021. The submission seeks the rezoning to TC / REGEN to fulfil the needs of the community. These submissions are supported by a petition with 154 signatures. The submission is seeking to demonstrate the site as a suitable location to provide an additional supply of community uses close to Lucan Village. A further submission notes that the subject lands are not put forward for rezoning as part of the proposed variation. The submission suggests that the site should be considered for rezoning to Village Centre (VC) as the additional zoned land in the proposed variations would require further social and community infrastructure. The submission states that the majority of the subject lands are included within the Lucan Village ACA. Therefore, it would make sense for the site to be rezoned as 'VC -Village Centre'. The submission highlights that this suggested rezoning would provide more of a flexible land use approach allowing for a broad range of uses, enabling	within the site (Stewarts Crafts, Lucan Road Lower RPS Ref. 020 - Detached Three-Bay Two-Storey Red Brick Building) and area immediately around it are located within the Lucan Village – Architectural Conservation Area. The submission indicates that the Stewarts Crafts building has been vacant for 4 years. Submissions are seeking the rezoning of the site to various mixed use type designations, Village Centre (VC), Town Centre (TC) or REGEN. Proposed Variation No. 2 has been prepared to address, as quickly as possible, specific and targeted amendments to the Development Plan in response to the Revised NPF housing growth requirements and identified strategic needs. The scope of the exercise did not facilitate a general review of small scale, localised, housing or other potential uses. A recent appeal on the site associated with planning application reference SD25A/0065W was refused planning permission by An Coimisiún Pleanála, whereby a community centre and place of worship were deemed unacceptable. The Protected Structure was noted on site, and the Commission was not satisfied that a relaxation of site zoning restrictions was necessary to secure the preservation and conservation of the protected structure as set out in Policy NCBH19 (Protected Structures) Objective 4 of the County Development Plan. The Commission considered the nature and condition of the subject premises and the range of alternative uses which the Development Plan lists as either 'permitted in principle' or 'open for consideration' in areas zoned to provide for enterprise and employment related uses. The County Development Plan seeks to facilitate the creation of a strong and resilient economic base. EDE1 Objective 3 of the County Development Plan identifies the importance of a sufficient supply of

an opportunity for additional community facilities in close proximity to Lucan Village. The submission states that the rezoning would allow for a wider range of uses that can be accommodated by the existing protected structure on site which will ensure the longevity of the building. It is indicated that the site is within walking distance of bus services, including route L52 approximately 6 minutes away and served by high-frequency routes by a stop close to the site (C3, C4, C5, C6, L54, X30, X31, X32). The submission makes reference to the planning history on site, noting the recent refusal by An Coimisiún Pleanála for a place of worship based on the EE zoning.	zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types. The NPF recognises the importance of aligning enterprise development with housing, transport and services. While the submission sets out the circumstances leading to the current zoning designation and raises concerns that the current zoning does not facilitate the proposed community use, it is considered that the appropriate mechanism for addressing a change of zoning of this nature is through the preparation of the next County Development Plan when a more detailed analysis of all zoning can be carried out, beyond the strategic purpose of this Variation. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is

	11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP.

	Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. The lands being proposed in the Variation include Specific Local Objectives (SLOs) which facilitate the objective sought in the submission for community /social infrastructure to be delivered with housing growth. This approach seeks to ensure that identified social infrastructure needs are addressed to support housing growth and existing communities. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment and Appropriate Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** As with any land use zoning on these lands, proximity to the River Liffey, the Liffey Valley SEO, Lucan ACA and protected features including the bridge all increase the overall sensitivity of the lands. Absence of mitigation potential impacts on land use activities could therefore arise on Biodiversity, Flora and Fauna (BFF), Water Quality (W), Cultural Heritage (CH) and Landscape (L) SEOs in particular. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these amendments would need to be subject to appropriate assessment and consideration as part of the NIR of the proposed

	Variation. It is noted that the NIR of the proposed Variation, identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation and land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and county-wide policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Smaller scale lands being sought to deliver mixed use zoning have not been identified in the Variation given its required strategic intent and purpose. Furthermore, the matters raised in this submission may be considered in the context of the next CDP, where a more comprehensive assessment of zoning designations will be undertaken.
CE Recommendation No change to the proposed Variation no. 2 to the South Dublin County Development Plan 2022-2028.	

36 MONASTERY CRESCENT

Submission No.
SD-C401-CDP25-774 – Keith Howell

Summary	CE Response
The Submission outlines the reasons why a land parcel (c. 0.0527ha.) located adjacent to 36 Monastery Crescent, Clondalkin (currently zoned Objective 'OS'), should be rezoned to Objective 'RES' as part of the proposed variation to the SDCC County Development Plan (CDP).	**Zoning** This submission is seeking the designation of lands adjacent to 36 Monastery Crescent, Clondalkin that are currently zoned Objective 'OS' to 'RES' under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028. It is noted that the zoning of the subject lands was changed from 'RES' to 'OS' at Draft Plan stage of the South Dublin County Development

The submission outlines that the current zoned Objective 'OS' arose from an error in the description of the lands in a council motion (17th June 2021). It is stated that this description, mischaracterised the lands as a separate or adjacent space, rather than as part of a privately owned residential folio (DN142830F). The submission states that this zoning designation has given rise to ongoing difficulties, including inconsistency between private ownership and perceived public use, concerns regarding public liability, maintenance and disputes with neighbouring residents arising from the status of the lands. As stated, the submission proposes a zoning 'correction' and that a portion of the lands be split for public use, through a land transfer arrangement, while retaining the remaining land as private residential curtilage.	Plan 2022-2028 held on 17th June 2021 (motion ID 70759). This change was retained in the adopted plan. The land parcel in question is c. 0.0527Ha in size. Proposed Variation No. 2 has been prepared to address, as quickly as possible, specific and targeted amendments to the Development Plan in response to the Revised NPF housing growth requirements and identified strategic needs. The scope of the exercise did not facilitate a general review of very small scale, localised, housing potential. While the submission sets out the circumstances leading to the current zoning designation and raises concerns regarding the practical implications of the Objective 'OS' zoning on stated privately owned land, it is considered that the appropriate mechanism for addressing a perceived zoning discrepancy of this nature is through the preparation of the next County Development Plan when a more detailed analysis of all zoning can be carried out, beyond the strategic purpose of this Variation. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery.

	The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030.

	The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** At strategic scale, this submission represents a very small potential infill site for residential development. It is not identified as generating any significant potential adverse effects at strategic scale. **AA:** Whilst the footprint is very small and this site is well set back from watercourse, the only connection between this site and Dublin Bay European Sites is likely to be surface water drainage infrastructure as well as wastewater discharges which are ultimately expected to be discharged to the Ringsend WWTP. Given the small footprint of this site, the volume of surface water discharging from same, in the context of the overall receiving River Liffey catchment will be miniscule. In addition, the volume of

	wastewater loading generating by any future housing on these lands, is also expected to be miniscule. As such, the surface water and wastewater emissions generated by future housing on this land, is expected to be de minimus and will not have the potential to result in Likely Significant Effects, alone or in combination, with other plans and projects to European Sites. Notwithstanding the consideration set out above, in the event the plot is brought forward to residential zoning, the lands, as with all such lands proposed, would be required to be brought forward to screening for AA as part of the variation **SFRA:** The site is not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and county-wide policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Smaller scale lands which may have potential to deliver one or two housing units have not been identified in the Variation given its required strategic intent and purpose. Furthermore, the matters raised in this submission may be considered in the context of the next CDP, where a more comprehensive assessment of zoning designations will be undertaken.
CE Recommendation No change to Variation No. 2 of the South Dublin County Development Plan 2022-2028.	

ELMCASTLE COURT

Submission No.

SD-C401-CDP25-196 – Noeleen Harte

SD-C401-CDP25-707 – Suzanne Harte

Summary	CE Response
The Submissions outline the reasons why a land parcel (c. 0.08ha.) located adjacent to 21 Elmcastle Court, Kilnamanagh (currently zoned Objective 'OS'), should be rezoned to Objective 'RES' as part of the proposed variation to the SDCC County Development Plan (CDP).	**Zoning** This submission is seeking the designation of lands adjacent to 21 Elmcastle Court, Kilnamanagh that are currently zoned Objective 'OS' to 'RES' under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022 – 2028.

The submissions outline that the subject lands were intended for residential development, under the original parent permission (granted in 1974), which identified a detached dwelling on the site. It is stated that no 'OS' designation was intended for the subject lands, and therefore the current CDP mapping represents an 'anomaly'. This has resulted in the 'sterilisation' of a privately owned remnant infill site. The submissions state that the lands are not used for public open space, do not form part of the open space strategy for the Kilnamanagh development, and are surrounded by established residential development. The submissions refer to a Section 183 Council disposal of lands at Pinetree Grove, within the same estate and of similar characteristics, to support the case for administrative consistency. In addition, it is stated that the subject lands meet the criteria of a Tier 1 serviced site, under the Revised NPF and associated Section 28 Guidelines and aligns with policy objectives for Compact Growth and Infill Development.	The land parcel in question is c. 0.08ha in size. It is noted that the site has been zoned Open Space (OS) for a number of County Development Plans, a zoning not changed in the current Development Plan. It is also noted that a wall was recently granted retention by An Coimisiún Pleanála (ACP) around the edge of the site, a key rationale for this in the Inspector's report being that the retention permission continued to provide an open access point to the public, therefore there was no change in use of the lands (Ref. PL-500499-SD-25). Proposed Variation No. 2 has been prepared to address, as quickly as possible, specific and targeted amendments to the Development Plan in response to the Revised NPF housing growth requirements and identified strategic needs. The scope of the exercise did not facilitate a general review of very small scale, localised, housing potential. While the submission sets out the context with regard to the current zoning designation and highlights associated policy objectives, it is considered that the appropriate mechanism for addressing a perceived zoning discrepancy of this nature is through the preparation of the next County Development Plan when a more detailed analysis of all zoning can be carried out, beyond the strategic purpose of this Variation. **Variation Context and Process** For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan

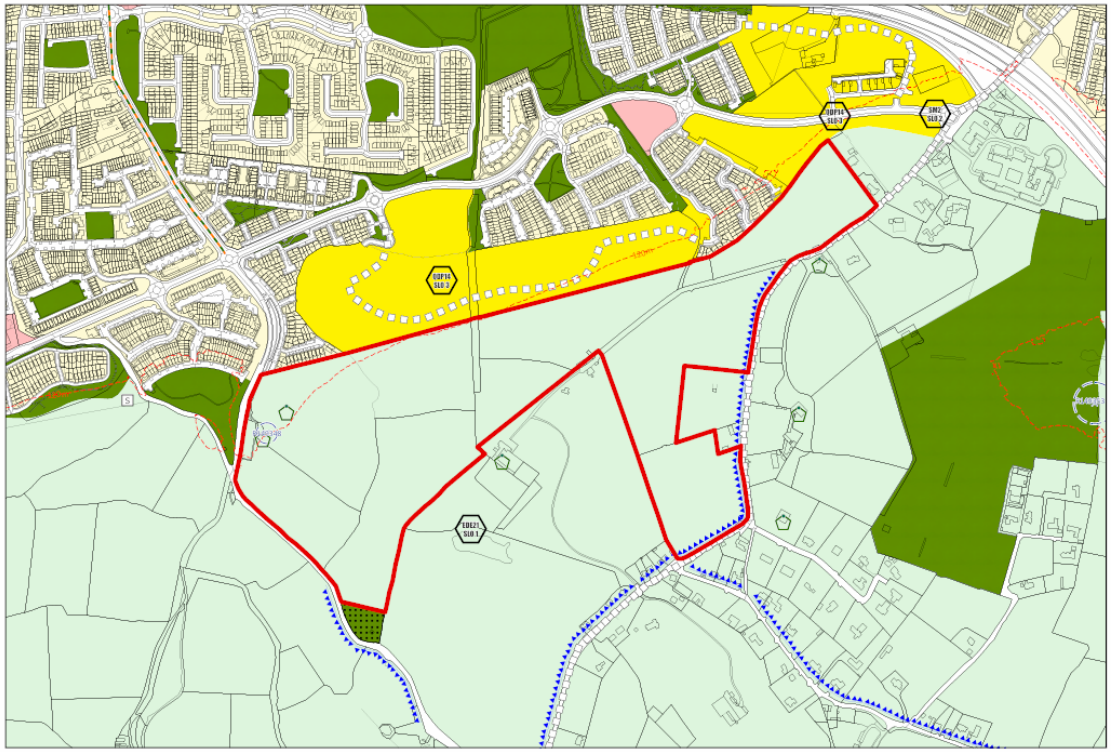
	period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate c. 2,000 units. Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. To aid the identification of potential lands, a non-statutory consultation was undertaken. When factoring in the Guidelines requested consideration of 'additional provision' of up to 50% to meet the baseline targets, land sufficient to accommodate up to an additional 5,850 dwellings over the baseline was part of the review. Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5

	hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation has also considered the need for longer term lands to facilitate delivery of housing targets up to 2040 with a focus on transport-oriented development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet the housing shortfall for 2028 with built-in additional capacity. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** At strategic scale, this submission represents a very small potentially infill site for potential residential development. It is not identified as generating any significant potential adverse effects at strategic scale. **AA:** Whilst the footprint is very small and this site is well set back from watercourse, the only connection between this site and Dublin Bay European Sites is likely to be surface water drainage infrastructure as

	well as wastewater discharges which are ultimately expected to be discharged to the Ringsend WWTP. Given the small footprint of this site, the volume of surface water discharging from same, in the context of the overall receiving River Liffey catchment will be miniscule. In addition, the volume of wastewater loading generating by any future housing on these lands, is also expected to be miniscule. As such, the surface water and wastewater emissions generated by future housing on this land, is expected to be de minimus and will not have the potential to result in likely significant effects, alone or in combination, with other plans and projects to European Sites. Notwithstanding the consideration set out above, in the event the plot is brought forward to residential zoning, the lands, as with all such lands proposed, would be required to be brought forward to screening for AA as part of the Variation. **SFRA:** The lands are not within Flood Zones A or B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and county-wide policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Smaller scale lands which may have potential to deliver one or two housing units have not been identified in the Variation given its required strategic intent and purpose.

	Furthermore, the matters raised in this submission may be considered in the context of the next CDP, where a more comprehensive assessment of zoning designations will be undertaken.
CE Recommendation No change to Variation No. 2 of the South Dublin County Development Plan 2022-2028.	

OLDCOURT, BALLYCULLEN



Submission No.
SD-C401-CDP25-1148 – Maplewood Residential

Summary	CE Response
Proposed Long Term Designation Submission made by Tom Philips and Associates on behalf of Jones Investments Limited, Eventpoint	**Proposal** This submission is seeking the designation of lands located in Oldcourt/Ballycullen/Woodtown that are currently zoned Objective RU

Limited and Runware Limited. Submission outlines the reasons why a large land parcel (c. 35.8ha) located at Oldcourt/Ballycullen/Woodstown (currently zoned Objective RU), is a prime candidate to accommodate significant residential led development and should be designated as 'Future Strategic Long-Term Development Area' (Future SDA) in Variation No. 2 of the South Dublin County Development Plan 2022-2028. The submission notes that Eventpoint Limited (in consultation with Jones Investment Limited) and Runware Limited originally made submissions to South Dublin County Council in response to its invitation to landowners to propose lands suitable for residential zoning that could contribute towards meeting the updated housing growth requirements set out in the Section 28 Guidelines – NPF Implementation: Housing Growth Requirements as follows: - The submission by Runware Limited related specifically to lands within the wider Woodtown Demesne (c. 30.7 ha), focusing on the low-lying northern lands in its ownership as suitable for residential development (refer to SDCC Ref. SD-C388-CDP25-24). There is an existing SLO on lands to the south, which can be maintained and complement any future residential development to the north. - The submission by Eventpoint Limited related specifically to lands comprising 17ha located at	to a 'Future Strategic Long-Term Development Area' (Future SDA) under Variation No. 2 of the South Dublin County Development Plan 2022-2028. The land parcel in question is c. 35.8 hectares. **Variation Context and Process** Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation also considered the need for longer term lands to facilitate delivery of housing targets up to 2040. This resulted in lands being identified in the proposed Variation to include objectives for Future Strategic Long Term Development Areas (SDAs) at Adamstown South and West, Newlands, Belgard and Grangecastle with a focus on Transport Oriented Development (TOD). The zoning of these lands will be a matter for the next CDP. As such, South Dublin has untaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet:

Woodtown, Ballycullen (refer to SDCC Ref. SD-C388-CDP25-3). Both call for lands submissions are appended to this submission (Appendix B and C). These developers (Jones Investments Limited, Eventpoint Limited and Runware Limited) have since come together to make a formal joint submission to SDCC regarding the published variation, seeking the rezoning of the cumulative landbank, measuring c. 35.8 ha, to be designated as a 'Future Strategic Long Term Development Area' in order to primarily support the additional provision of up to 50% above the baseline housing growth requirement as set out by the NPF Guidelines. It is submitted that the subject lands offer an optimal opportunity for the delivery of a significant quantum of high-quality housing in the long term by reason that: - The lands represent a logical and sequential extension of the existing built-up area and have the potential to accommodate a new urban extension to Dublin City and Suburbs, thereby supporting compact growth in accordance with planning policy at all tiers. - The lands are highly accessible given their strategic location in proximity to the established settlements of Ballycullen, Firhouse and Knocklyon, c. 1km south-west of the M50, with	→ The housing shortfall to meet the baseline targets for 2028 → Built-in additional capacity to meet the 2028 targets → The long-term housing needs of the county to 2040 and beyond **Assessment Process** The Council has undertaken a criteria-based approach of a long list of lands either identified by SDCC or identified to SDCC during the Non-Statutory consultation period. The assessment focussed on: - The potential capacity of the lands to contribute to South Dublin's revised housing growth requirements and the 'additional provision' to provide for suitable flexibility, in accordance with the Section 28 Guidelines; and - The planning and infrastructure assessment criteria used for the Settlement Capacity Audit (SCA), as referenced in Sections 2.6.2 and 2.6.3, as well as an "Other Suitability" category (relating to deliverability, specific social infrastructure and site constraints). Following the assessment process, a number of lands were selected for rezoning under Proposed Variation No. 2; other lands were identified as suitable for strategic long-term potential (SDAs). These latter lands were not zoned but identified in the proposed Policy CS3 for the commencement of preparatory studies to inform future zoning. The subject lands were not included in the preferred lands identified in the proposed Variation, either as short term or strategic long-term lands. **SDAs and the Subject Site** Having regard to the requested Future SDA designation, it is noted that "Strategic Development Areas" (SDAs) are long-term development

direct frontage onto Old Ballycullen Road and the R115, and potential for multiple access points. - The lands are well served by existing and planned public transport, including Dublin Bus services and the future BusConnects network. - A wide range of services, amenities, schools and employment areas are located within close proximity. - The lands can be serviced by existing and planned infrastructure (including drainage and water services), subject to standard design requirements and consultation with the relevant authorities. - The lands are not prone to flooding. - Environmental, heritage and landscape considerations can be appropriately addressed through careful design and assessment. The submission indicated that. having regard to the locational characteristics of the site, a residential density of c. 40-60 dwellings per hectare (dph) could be achieved in accordance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), potentially providing between 1,000-1,500 units in total. The submission includes a detailed site description. The submission refers to the proposed Variation designations at Newlands, Belgard Road West, Adamstown South and West and Grange Castle /	sites for major urban regeneration and/or transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and alignment with significant investment in infrastructure and services. The existing SDAs in the County Development Plan and proposed Future Long Term SDAs in the proposed Variation align with National Policy Objective 10 of the National Planning Framework (NPF) First Revision 2025 relating to Transport Orientated Development (TOD) which states: *National Policy Objective 10* *Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.* The proposed Future SDA at Adamstown South and West (Outer), Amendment no. 17, was identified as a future SDA having regard to its location on the rail line, with an existing station at Adamstown and planning approval for the infrastructure to serve DART+SW, to its scale and to the potential for infrastructure delivery alignment. The lands are also contiguous to the existing SDA in the CDP 2022-2028 namely Adamstown SDZ and to the associated infrastructure. The proposed Future SDAs at Newlands, Belgard Road and Grange Castle, are centrally located within the existing Dublin City and Suburbs settlement boundary. Newlands and Belgard Road are accessible to the Luas Red Line, further supporting transport orientated development (TOD).

R136 as Future SDAs with a stated purpose to give a "clear strategic direction to future development locations under the next 10-year County Development Plan". It submitted that this demonstrates the Planning Authority recognises long term development potential of lands beyond the lifetime of the Development Plan (up to and beyond 2040). It is submitted that the identification of further Future Strategic Development Areas would assist in ensuring an adequate long term housing land supply in South Dublin County in accordance with the Guidelines. It is submitted that no lands are identified as Future Strategic Development Areas (Future SDAs) in the southern part of South Dublin County, and the subject land parcel presents an optimal opportunity to address this. Appendix A of the submission consists of a map showing the subject land parcel in relation to the proposed Future Strategic Development Areas under the Variation.	**Subject Lands** **Transport Infrastructure** There is a 6-year Road Objective along Ballyboden Road/Stocking Lane (R115) to upgrade the existing road in order to enhance pedestrian and cycling facilities and support the tourist potential of the route. The R115 which immediately adjoins the subject land parcel along part of its eastern boundary is the main route serving Montpelier Hill and Killakee Estate (now called Lord Massy's Estate), which is owned by the State forestry company Coillte and are open to the public. Located atop of Montpelier Hill is the Hellfire Club. This area is also the location of the Dublin Mountains Visitor Centre Project (DMVC) also known as 'Hellfire'. This area is a popular tourist attraction offering amenities such as walking and hiking trails. This area is served by the SD4 Tallaght to Tibradden Wood bus route which operates on Saturdays only. There is an SLO to the south of the subject land parcel stating the following: *SM2 SLO2:* *To consider an off-road shared cycle and pedestrian path from Stocking Lane to the Hellfire Club to provide a safe alternative to cars, to access this amenity.* It is noted that Stocking Avenue to the north of the subject lands is currently served by the 15B Dublin Bus only. The 15B bus then intersects further north with the S8 Orbital Route which connects Dún Laoghaire with Sandyford Luas, Tallaght and Citywest. The 15B operates with a frequency of every 15 to 30 minutes during daytime hours, with more frequent service (approx. every 15 min) during peak

	times. The S8 bus operates with a frequency of 15–30 minutes during weekdays and generally every 30 minutes on weekends. The lands are not within an area of planned or existing high-capacity public transport in the form of rail or bus connects and cannot be considered to meet the criteria for Transport Oriented Development. Given their location within the foothills, outside the current Dublin City and Suburbs Settlement area they do not compare favourably to the SDAs in the proposed Variation and are unsuitable to be considered as a Long Term Strategic Development Area as part of this Variation. **Environment, Heritage and Landscape** In contrast to the Future Long-Term SDAs set out in the proposed Variation, the subject lands extend into the foothills of the Dublin Mountains as defined in Figure 38 Landscape Character Types and Sensitivity map in the Landscape Character Assessment (LCA) Appendix 9 of the CDP 2022-2028. With regard to the Principles for Development in relation to the 'Low Foothills', defined as being generally located between 100m and 200m contour lines, the LCA states that: *The low foothills form an important backdrop to the lowlands and large scale development would diminish their landscape and visual value. Hedgerows of native species remain a feature so should be encouraged as a boundary treatment will improve screening and locally enhance biodiversity. Viewpoints and laybys – better boundary treatments would enhance these.* There is an SLO on the lands to the south of subject land parcel as follows:

	EDE21 SLO 1: To facilitate leisure, recreation, outdoor activities, sporting pursuit centre, accommodation and tourism activity at Woodtown Manor and lands at Stocking Lane, Rathfarnham subject to environmental assessments, visual assessment, topographical detail, conservation assessments and due consideration being given to ensuring sensitive design and conservation of historical, architectural and archaeological features of the existing buildings and land. This indicates a future land use in this area that is more aligned with the RU zoning objective and foothill's location of the proposed lands.

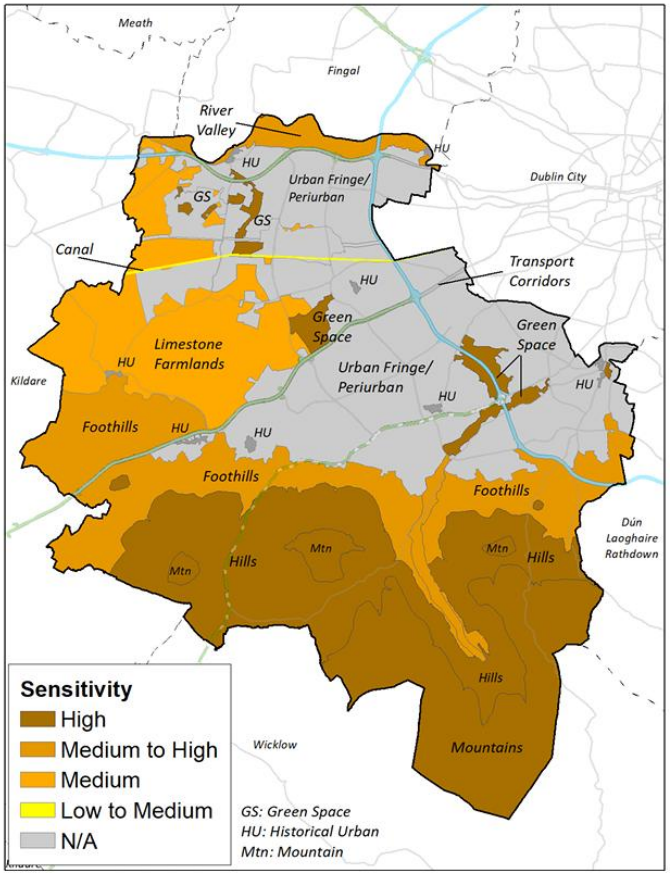


Image from Landscape Character Assessment (Appendix 9) of the CDP 2022-2028

There are a number of Protected Structures sited within the subject lands including Woodtown Manor House, Rathfarnham (House); Ballycullen Road, Firhouse (Stone Cross Dated 1868); St. Columbcille's Well, Ballycullen Road (Holy Well).

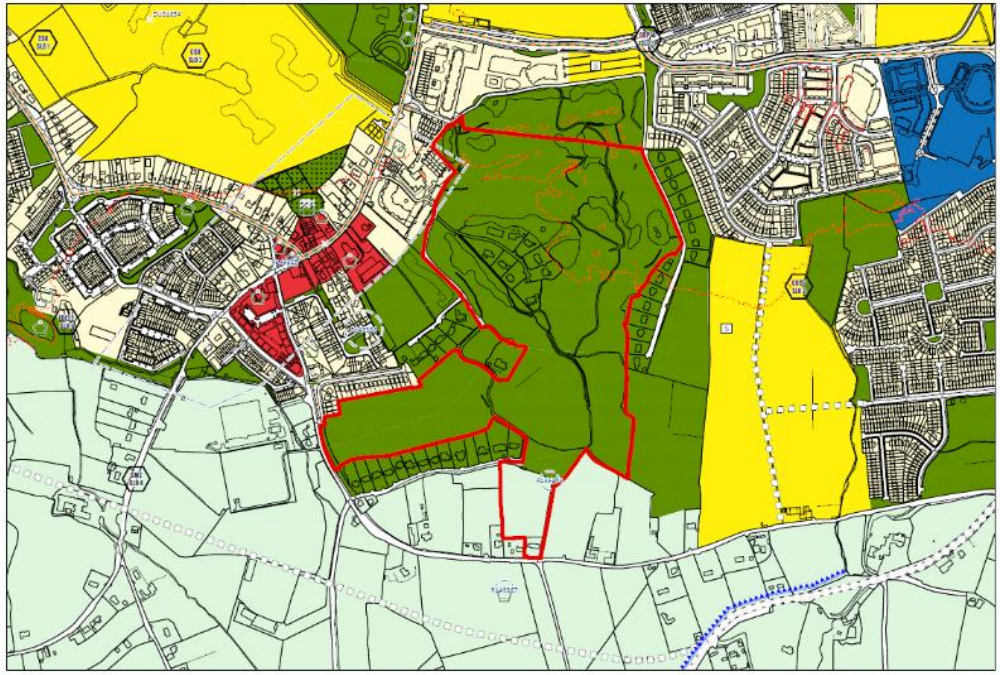
	There are Protected Monuments and Place (Zone of Interest) within the subject lands, namely R149348/ DU022-028 (Ritual site - holy well). There are Protected Views and Prospects along the R115 facing north, northwest and westwards over these lands. The following policy and objective in the CDP 2022-2028 are pertinent in this regard: *Policy NCBH15: Views and Prospects* *Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.* *NCBH15 Objective 1:* *To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places and to prevent development which would impede or interfere with Views and / or Prospects.* It is noted in the submission that the applicant acknowledges that the subject lands have environmental, heritage and landscape considerations and indicate that these can be appropriately addressed through careful design and assessment. However, it is considered that the subject lands extend into the Dublin Mountains foothills into lands that contain significant built and natural heritage and are increasingly sensitive as they rise in terms of landscape and visual impact of development. They do not offer the same degree of consolidation potential, or direct integration with high-capacity public transport infrastructure as the lands identified in the Variation. The Variation's identified SDA locations along the Luas and future

	DART+SW corridor are directly related to existing or planned transport nodes and are considered capable of accommodating large scale, phased, TOD of metropolitan significance over multiple plan periods. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the context of strategic environmental assessment, appropriate assessment and strategic flood risk assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** An extensive area that is on the lower foothills of the county. The strong hedgerow network and proximity to scrub increases overall environmental sensitivity and would potentially generate adverse effects across Biodiversity, Flora and Fauna and Landscape SEOs in particular. Potential adverse interactions also in relation to material assets given its rural location and overall weak linkages to existing settlement. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these amendments would need to be subject to appropriate assessment and consideration as part of the NIR of the proposed Variation. It is noted that the NIR of the proposed Variation, identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation and land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide

	appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** A small area of land within the northwestern corner along Ballycullen Road is located within Flood Zone B. **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. It is considered that the designation of the proposed lands at Oldcourt / Ballycullen/Woodstown as a Future SDA, would represent an unnecessary expansion of development into the Dublin foothills, lacks the characteristics preferable for strategic long term lands and as such would be an inappropriate location for the establishment of a distinct strategic focus for long-term growth in the County. Therefore, having regard to the extent of lands identified in the proposed Variation to meet longer-term development needs along high-capacity public transit corridors, alongside that of City Edge, it is considered that there is no demonstrated strategic requirement at this time to include additional Future SDA lands beyond those already identified, and in the context of the submission, those at Oldcourt / Ballycullen / Woodstown. The lands proposed in this submission have not been identified in the Variation, are not considered suitable and are not required in terms of meeting the targets, as it is considered that sufficient and appropriately

	located land has been identified to meet the immediate and long-term targets set out in the Revised NPF and Section 28 Guidelines up to 2040.
CE Recommendation No change to proposed Variation No. 2 to the South Dublin County Development Plan 2022-2028.	

CITYWEST SACRA SOUTH



Submission No.

SD-C401-CDP25-975 – Stephen Little & Associates

SD-C401-CDP25-1451 – Saggart Village Residents' Association

Summary	CE Response
The submission outlines the reasons why a land parcel (c. 48.3ha.) located at Coldwater Lakes, Citywest (currently zoned Objective 'OS'), should be	**Zoning** This submission is seeking the designation of lands at Coldwater Lakes, Citywest that are currently zoned Objective 'OS' to a 'Future Strategic Long-Term Development Area' (Future SDA) under Variation No. 2 of the South Dublin County Development Plan (CDP) 2022-2028.

considered as part of the proposed Variation to the South Dublin County Development Plan 2022-2028. The submission outlines that the site in question is a prime candidate to accommodate significant residential led development and should be designated as 'Future Strategic Long-Term Development Area' (Future SDA). The submission refers to the land's proximity to the Luas Red Line terminus at Fortunestown Lane and details that the Sacra South Lands are highly accessible, brownfield, functionally defunct lands that share strong locational and functional characteristics with the Sacra North lands (Amendment No. 5 Citywest). The submission details that the Sacra South lands represent a logical long-term development opportunity, that could support the continued growth of this part of the County. Therefore, the submission requests that the Sacra South lands be identified as 'Future Strategic Long-Term Development Area' as part of Variation No. 2, in accordance with the Section 28 Guidelines – National Planning Framework: Housing Growth Requirements (July 2025). Separately, a submission objects to the identification of the Sacra South lands as a Future SDA, emphasising that the subject lands should be retained as open space and/or strategic green	The land parcel in question is c.48.3ha. **Variation Context and Process** Following the full review process Variation No. 2 identifies lands which significantly increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land with an equivalent unit potential of 7,324 dwellings. This is in addition to the capacity of the existing zoned land of 9,613 units (160ha) to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. The proposed Variation also considered the need for longer term lands to facilitate delivery of housing targets up to 2040. These identified the amendments to include objectives for Future Strategic Long Term Development Areas (SDAs) at Adamstown South and West, Newlands, Belgard and Grangecastle with a focus on Transport Oriented Development (TOD). The zoning of these lands will be a matter for the next CDP. Given the approach taken to the Variation, it is considered that South Dublin has clearly identified sufficient and suitable zoned land to meet: → The housing shortfall to meet the baseline targets for 2028 → Built-in additional capacity to meet the 2028 targets → The long-term housing needs of the county to 2040 and beyond **Assessment Process** The Council has undertaken a criteria-based approach of a long list of lands either identified by SDCC or identified to SDCC during the Non-Statutory consultation period. The assessment focussed on:

infrastructure, detailing that the subject lands should be considered for public and community infrastructure.	- The potential capacity of the lands to contribute to South Dublin's revised housing growth requirements and the 'additional provision' to provide for suitable flexibility, in accordance with the Section 28 Guidelines; and - The planning and infrastructure assessment criteria used for the Settlement Capacity Audit (SCA), as referenced in Sections 2.6.2 and 2.6.3, as well as an "Other Suitability" category (relating to deliverability, specific social infrastructure and site constraints). Following the assessment process, preferred lands were selected for rezoning under Proposed Variation No. 2; other lands were identified as suitable for strategic long-term potential (SDAs). These latter lands were not zoned but identified in the proposed Policy CS3 for the commencement of preparatory studies to inform future zoning. The subject lands were not included in the preferred lands that have gone out in the Variation, either as short term or strategic long-term lands. **SDAs and the Subject Site** Having regard to the requested Future SDA designation, it is noted that "Strategic Development Areas" (SDAs) are long-term development sites for major urban regeneration and/or transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and alignment with significant investment in infrastructure and services. The stated characteristics of the site are noted; however, it is considered that these characteristics, either individually or

	cumulatively, at this moment in time, do not demonstrate that the subject lands are suitable for designation as a Future SDA. Having regard to the submission's characterisation of the lands as brownfield and functionally defunct, it is considered that the subject lands (currently zoned objective 'OS'), comprise predominately undeveloped greenfield lands, within an area that has experienced significant urbanisation over the past 10-20 years. It is considered that the subject lands do not presently constitute a regeneration opportunity, nor do they align with national definitions of brownfield land, as set out in the Sustainable Residential Development and Compact Settlements Guidelines (2024) (Appendices - A). While proximity to the Luas corridor, as outlined in the submission, is an important consideration, it is the view of the planning authority that this attribute has been reflected more appropriately through the identification of Future SDA lands along the Red Line at Newlands (Amendment no. 19) and Belgard Road (Amendment no. 20). The location of Newlands and Belgard Road present a more suitable opportunity to provide compact development within the Dublin City and Suburbs settlement area, in line with National and Regional policy. In addition, the proposed land bank at Adamstown South and West (Amendment no. 17) were also identified as SDAs having regard to their location on the rail line, with an existing station at Adamstown and planning approval for DART+SW, and to their scale and potential for infrastructure delivery alignment. It is considered that the subject lands do not currently offer the same degree of scale, consolidation potential, or direct integration with high-

	capacity public transport infrastructure as the lands identified in the Variation. The Variation's identified SDA locations along the Luas and future DART+SW corridor are directly related to existing or planned transport nodes and are considered capable of accommodating large scale, phased, TOD of metropolitan significance over multiple plan periods. In contrast, the subject lands put forward in this submission are quite disjointed from a development perspective with irregular boundaries, and including an area identified as flooding in the northeastern section, and the existing Cold Lakes development. Furthermore, it is also noted within the County Development Plan SFRA mapping that the northeastern section of the subject lands is impacted by Flood Zone A and B. It is considered that the designation of the 'Sacra South' lands as Future SDA would represent a fractured expansion of the Citywest area, rather than the establishment of a distinct strategic focus for long-term growth. Therefore, having regard to the extent of lands identified to meet longer-term housing needs along high-capacity public transit corridors, alongside that of City Edge, it is considered that there is no demonstrated strategic requirement at this time to include additional Future SDA lands within the variation lands, and in the context of the submission, those at Sacra South. **Preliminary Environmental Evaluation** For sites put forward in submissions which were not included as part of the proposed Variation, the Council's environmental consultants were requested to provide a preliminary evaluation of the lands in the

	context of Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This preliminary evaluation is provided below following a desktop analysis of relevant baseline data. **SEA:** Potential adverse effects on Strategic Environmental Objectives (SEOs) relating to Biodiversity, Flora and Fauna plus soil and geology SEOs given the variety of habitats that appear present on these lands. Uncertain interactions on Material Assets SEOs in terms of public transport, water and wastewater services etc. It is noted that nearby lands already were assessed and identified as strategic development areas in longer term that would be subject to further surveys and consideration. **AA:** Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the Proposed Variation. It is noted that the NIR of the Proposed Variation, identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the Proposed Variation and land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location. **SFRA:** The Sacra South lands are not included in proposed Variation No. 2 as currently published and have not therefore been subject to an

	SFRA site-specific review at this stage. Should SDCC accept the request to designate Sacra South as a Future Strategic Long-Term Development Area, those lands would need to be screened for flood zone status, watercourse proximity, HEFS extents and surface water flow paths at the appropriate plan-making stage, in accordance with the Planning System and Flood Risk Management Guidelines (OPW/DoEHLG, 2009) and consistent with the framework applied to existing FSLT entries in the SFRA (Sites 137, 143, 150 and 151). **Conclusion** South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. The lands proposed in this submission have not been identified in the Variation, are not considered suitable and are not required in terms of meeting the targets, as it is considered that sufficient land has been identified to meet the immediate and long-term targets set out in the Revised NPF and Section 28 Guidelines up to 2040.
CE Recommendation No change to Variation No. 2 of the South Dublin County Development Plan 2022-2028.	

3.4 Miscellaneous or Other Matters Raised in Submissions

The below outlines the variety of submissions received relating to either the Written Statement, in general terms, whereby no change was made, or where comments have been received by landowners, members of the public, or statutory and non-statutory consultees, which are of a general nature with respect to the overall variation in totality rather than specific sites.

These matters may relate to general objections to Variation No. 2 of the County Development Plan. Submissions may concern the proposed level of zoning when considered in its entirety, including the cumulative effect such zoning may have on the wider functional area of South Dublin County Council (SDCC). Alternatively, they may address more general or overarching issues pertaining to the written statement, its structure, or its interpretation.

Following a comprehensive review and assessment of all submissions received, it is considered that the matters outlined below do not warrant any change or amendment to the proposed wording of the written statement, and any of the potential proposed wording changes are outlined in the Amendments Nos. 24-64 in the CE Response in the report. Rather, they are deemed to relate to particular aspects or elements of the content as presented, and do not raise issues that necessitate modification of the overall approach set out in the variation, however were considered and an overall response was deemed appropriate, as outlined below.

Please read the below in conjunction with the site-specific summaries and the Planning Authority CE Responses. Furthermore, the below should be read in the context of the ‘Overdevelopment’ section within each variation amendment, which covers the wider concerns of the cumulative impact of the proposed variation, notably for the Lucan area.

General Comments Arising from the Written Statement

Submission No.

SD-C401-CDP25-36 – Daren O Brien	SD-C401-CDP25-40 – Joy Graham	SD-C401-CDP25-110 – Anna Chrysovergi
SD-C401-CDP25-165 – David POWER	SD-C401-CDP25-171 – John O'Shea	SD-C401-CDP25-174 – David Doherty
SD-C401-CDP25-203 – David O'Reilly	SD-C401-CDP25-215 – Mark Donnelly-Orr	SD-C401-CDP25-216 – Amy Carroll
SD-C401-CDP25-305 – Weston Airport	SD-C401-CDP25-355 – Jason Kavanagh	SD-C401-CDP25-363 – Owen O Brien
SD-C401-CDP25-377 – Mirela Iulia Zalaru	SD-C401-CDP25-388 – Robert Maloney	SD-C401-CDP25-403 – Thomas Harte
SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-433 – Joe O'Rourke	SD-C401-CDP25-446 – Fiachra Brennan
SD-C401-CDP25-455 – Elizabeth O'Reilly	SD-C401-CDP25-456 – Thomas O'Reilly	SD-C401-CDP25-462 – Ciara Dardis
SD-C401-CDP25-463 – Alan Tolan	SD-C401-CDP25-469 – Patricia Graham	SD-C401-CDP25-474 – Una Howley
SD-C401-CDP25-478 – Paul Donnelly	SD-C401-CDP25-502 – Bláthnaid O'Dwyer	SD-C401-CDP25-513 – Pam Peard
SD-C401-CDP25-520 – Simon Hand	SD-C401-CDP25-525 – Aisling Ainscough	SD-C401-CDP25-549 – Mirela Iulia Zalaru

SD-C401-CDP25-559 – Daniel O'Rourke	SD-C401-CDP25-576 – Magda Ghanim	SD-C401-CDP25-589 – Paul O'Rourke
SD-C401-CDP25-591 – Gerry McAndrew	SD-C401-CDP25-594 – Rupert Fuller	SD-C401-CDP25-596 – The Maritime Area Regulatory Authority (MARA)
SD-C401-CDP25-644 – Grace Carey	SD-C401-CDP25-648 – Diane Grogan	SD-C401-CDP25-649 – Westbury Court Residents Association
SD-C401-CDP25-748 – Alan Furlong	SD-C401-CDP25-772 – James Grogan	SD-C401-CDP25-776 – Mary Whittle
SD-C401-CDP25-777 – Little Folk Preschool	SD-C401-CDP25-783 – Sarah Owen	SD-C401-CDP25-825 – Jennifer Merriman
SD-C401-CDP25-830 – Kevin Lyons	SD-C401-CDP25-839 – Basil Hudson	SD-C401-CDP25-847 – Grace Lavery O'Reilly
SD-C401-CDP25-849 – Adrienne Sullivan	SD-C401-CDP25-851 – Derek Joyce	SD-C401-CDP25-877 – Irish Water
SD-C401-CDP25-884 – Dermot Keogh	SD-C401-CDP25-895 – Heather Hallinan	SD-C401-CDP25-910 – Patrycja Demianiuk
SD-C401-CDP25-912 – glenn roche	SD-C401-CDP25-969 – Dermot McGreal	SD-C401-CDP25-979 – Brian Foley
SD-C401-CDP25-1002 – Martin McHugh	SD-C401-CDP25-1041 – Transport Infrastructure Ireland	SD-C401-CDP25-1056 – Office of Public Works
SD-C401-CDP25-1070 – Bernardo Muchata	SD-C401-CDP25-1077 – AIMEE AHERN	SD-C401-CDP25-1149 – Daniel Kochanski

SD-C401-CDP25-1152 – Maria Filatova	SD-C401-CDP25-1159 – David Whittle	SD-C401-CDP25-1167 – Inland Fisheries Ireland
SD-C401-CDP25-1168 – Philip Murphy	SD-C401-CDP25-1173 – Tina Dwyer	SD-C401-CDP25-1219 – Denis Twohig
SD-C401-CDP25-1239 – Cllr. Helen Farrell	SD-C401-CDP25-1290 – Elzbieta Musial	SD-C401-CDP25-1291 – Ronan N
SD-C401-CDP25-1293 – Anum Alam Khan	SD-C401-CDP25-1294 – Ali Madras	SD-C401-CDP25-1297 – Audrey Smith
SD-C401-CDP25-1305 – Geraldine Lavin	SD-C401-CDP25-1314 – Miriam Whittle	SD-C401-CDP25-1325 – Siobhan Nolan
SD-C401-CDP25-1352 – Caroline O'Brien	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1375 – Office of the Planning Regulator
SD-C401-CDP25-1426 – Jack O'Sullivan	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1442 – Paul Gogarty TD
SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1450 – Edina Almasi	SD-C401-CDP25-1456 – Donal Curran
SD-C401-CDP25-1462 – Tessa Curran	SD-C401-CDP25-1475 – Patrick Brodie	SD-C401-CDP25-1502 – daa
SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1531 – John Lahart TD	SD-C401-CDP25-1542 – Sean Ward
SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1574 – Ciarán Ahern TD	SD-C401-CDP25-1588 – John Spain Associates

SD-C401-CDP25-1592 – John O'Brien	SD-C401-CDP25-1594 – Sara Feeney	SD-C401-CDP25-1597 – Cllr Vicki Casserly
SD-C401-CDP25-1600 – Agnieszka Trzos	SD-C401-CDP25-1603 – John Devaney	SD-C401-CDP25-1605 – Eleonore McKinney
SD-C401-CDP25-1613 – Fintan Tait	SD-C401-CDP25-1618 – Paddy Keating	SD-C401-CDP25-1620 – Bhawna Rana
SD-C401-CDP25-1621 – Tomasz Lemanski	SD-C401-CDP25-1622 – Susan Phelan	SD-C401-CDP25-1639 – Carmel Callaghan
SD-C401-CDP25-1645 – Clare Hamilton	SD-C401-CDP25-1649 – Frank O'Leary	SD-C401-CDP25-1655 – LIONA O'TOOLE
SD-C401-CDP25-1664 – Knocklyon Network	SD-C401-CDP25-1666 – Shane Moynihan TD	SD-C401-CDP25-1676 – South Dublin Conservation Society
SD-C401-CDP25-1705 – Kirill Priadko	SD-C401-CDP25-1708 – Niamh Lacy	SD-C401-CDP25-1709 – Daniel McCartney
SD-C401-CDP25-1715 – Maria Murphy	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1752 – John McGivney
SD-C401-CDP25-1772 – Philip Curran	SD-C401-CDP25-1776 – Chris Conway	SD-C401-CDP25-1777 – Una Mullaney
SD-C401-CDP25-1778 – Peter Coakley	SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG	SD-C401-CDP25-1802 – Kingswood Heights Residents Association NIA
SD-C401-CDP25-1895 – May O' Reilly Moore	SD-C401-CDP25-1899 – Bridget McEvoy	SD-C401-CDP25-2298 – Gráinne Hannon

SD-C401-CDP25-2309 – Elizabeth Griffin	SD-C401-CDP25-2324 – Florrie Dowling	SD-C401-CDP25-2357 – Jane Ryan

Summary	CE Response
The submissions received in respect of the written statement and commentary of a general nature related to the proposed Variation No. 2 present a highly consistent and strongly articulated position that the scale, pace, and spatial concentration of proposed rezoning—particularly within the Lucan–Adamstown–Clonburris corridor—are not supported by adequate infrastructure, services, or environmental capacity, and therefore represent premature and unsustainable planning. The following are therefore the key general issues raised in response to the written statement: A central and recurring concern, in general terms, is that the Council should prioritise the delivery of already permitted and zoned lands, especially within the Adamstown and Clonburris SDZs, where a substantial housing pipeline remains incomplete (frequently cited at over 12,000 units yet to be delivered), rather than introducing new greenfield rezonings. Submissions argue that the issue is not a lack of zoned land but rather the delivery and activation of existing lands, and that further zoning risks compounding existing infrastructure deficits. This is closely linked to the perception that the Lucan area is bearing a disproportionate share of	In the first instance, it should be noted that the majority of these issues as outlined above are captured in site by site assessments outlined later in the report. Furthermore, for a specific response to the theme of Overdevelopment, please see the response within the report on a site by site basis, which includes a response to the cumulative Lucan wide issue raised from submissions. Notwithstanding this, SDCC has ensured that it has taken a robust approach to the review of all submissions made on Variation no.2 to the CDP, and issue responses are provided later in the report for each site proposed, as well as other sites arising. The above issues are related to general comments which are dealt with within each of the sites, however SDCC felt that their generality meant that they should also be noted here. The bespoke overdevelopment response deals with the majority of the issues raised above. Overall, it is important to note that the purpose of the variation is to deliver additional housing for the state and for SDCC to serve the growing population through the implementation of the revised National Planning Framework. In order to ensure proper planning and sustainable development, it was critical that national guidance and objectives were utilised in the identification of lands for rezoning and as Future SDAs, such as Transport Orientated Development and Compact Growth, in addition to the relevant Section 28 Guidelines for

housing growth, with approximately 60–64% of proposed rezonings concentrated in an area already accommodating two major SDZs, despite representing a relatively small proportion of the county's land area. This concentration is widely viewed as inconsistent with balanced regional development and compact growth principles, with repeated calls to instead prioritise brownfield regeneration, particularly in central and underutilised urban areas such as City Edge. Transport and accessibility emerge as the most critical constraints. Submissions consistently describe a road network operating beyond capacity, with severe congestion along the N4 corridor, M50 junctions, Newcastle Road, and Lucan Village, where a single bridge creates a significant bottleneck. Issues such as rat running, toll avoidance traffic, prolonged journey times, and safety concerns are highlighted as already significantly impacting daily life. Public transport is similarly described as overstretched, unreliable, and insufficient, with bus routes (particularly the C-spine services) frequently full before reaching stops and rail capacity inadequate, with no meaningful upgrades expected in the short term. The absence of a direct public transport link to Dublin Airport is repeatedly identified as a critical gap for a settlement of Lucan's size. While future infrastructure such as DART+	Compact Settlements. These provided the fundamental planning principle baseline for the capacity audit utilised to identify and score sites, alongside infrastructure and transport accessibility. In response to issues raised through engagement with statutory stakeholders, such as Uisce Éireann and the NTA, and Environmental Consultants employed by SDCC to prepare the SEA, AA and SFRA, it was essential to develop Specific Local Objectives (SLOs) to supplement the identification of sites in the variation. This would ensure that the sites would develop in a sustainable manner, linking them to key infrastructure requirements. Further detail on this can be found in the CE response to each site. Finally, it should be emphasised that proposed Variation No. 2 is fundamentally aligned with national policy objectives under the National Planning Framework (NPF) and Project Ireland 2040 and represents a necessary and timely response to updated housing growth requirements and the urgent need to increase housing supply. Rather than undermining sustainable development or infrastructure-led planning, the Variation can be understood as actively enabling these principles, particularly in the context of compact growth (NSO 1), which prioritises the efficient use of serviced and serviceable lands within the existing metropolitan footprint, notably by utilising SLOs. The identification of additional residential lands—particularly those contiguous to existing urban areas such as Lucan—supports the consolidation of growth in locations where significant investment has already occurred or is planned, including transport corridors (e.g. DART+ South West and BusConnects), thereby aligning with transit-oriented development principles over time.

South West and Luas Lucan is acknowledged, these are widely regarded as too uncertain or too distant (post-2030) to support current zoning decisions. As such, submissions strongly argue that development reliant on such infrastructure is premature and contrary to infrastructure led planning principles. There is also a pronounced focus on the deficit in social, community, and utility infrastructure, with consistent reference to shortages in school places, childcare capacity, GP and healthcare services, and community facilities such as sports pitches, youth spaces, and cultural amenities. These deficits are described as already impacting quality of life and are expected to worsen significantly with further population growth. Submissions emphasise the need for binding, phased delivery of infrastructure alongside housing, rather than the retrospective provision that has characterised previous developments. Concerns extend to utilities and drainage systems, with references to existing capacity constraints, wastewater network limitations, and risks of flooding and surface water runoff. Environmental and amenity concerns are equally prominent. Submissions strongly emphasise the need to protect greenfield, agricultural, and high-amenity lands, citing their roles in biodiversity, flood mitigation, carbon sequestration, and community	In relation to NSO 10 (Access to quality childcare, healthcare, and education), while submissions highlight current pressures on services, it is important to note that land use zoning in itself does not deliver infrastructure but is a critical prerequisite for its future planning and provision. The Variation facilitates population growth projections that, in turn, enable statutory agencies and service providers (such as the Department of Education and Youth, HSE, and childcare providers) to plan, secure necessary funding, and deliver new infrastructure in a coordinated manner in conjunction with Local Authorities and other service providers. Without appropriate zoning and certainty regarding future population distribution, infrastructure delivery cannot be effectively programmed. Furthermore, Development Plan policies already include requirements for developer contributions, phasing, and provision of community facilities, ensuring that social infrastructure is integrated into development proposals at planning application stage. With respect to NSO 7 (Enhanced Amenity and Heritage), the Variation does not propose the wholesale loss of amenity or heritage assets but instead operates within the framework of the existing Development Plan, which includes strong protections for high amenity lands, green infrastructure networks, and built heritage. Any future development on proposed lands will remain subject to detailed planning assessment, Appropriate Assessment (AA), Environmental Impact Assessment (EIA), and compliance with biodiversity and landscape policies. In this context, concerns regarding individual sites such as St. Edmundsbury and Finnstown Castle, they can be addressed through the development management process, refined master planning, and site-specific

wellbeing. Lands such as St. Edmundsbury, Tubber Lane and Finnstown are specifically identified as critical for climate resilience in the context of increased rainfall. The loss of such lands is viewed as resulting in irreversible environmental damage, including habitat destruction, soil sealing, and increased flood risk. There are also concerns regarding the adequacy of environmental assessments, including reliance on desktop studies and insufficient consideration of cumulative impacts, hydrological connectivity, and the requirements of emerging legislation such as the EU Nature Restoration Law. Additionally, the protection of Lucan Village's historic character and tourism value is highlighted, with concerns that further development and congestion would undermine heritage, identity, and placemaking objectives. Submissions also raise significant issues regarding planning approach, governance, and transparency, arguing that the proposed variation appears target driven rather than plan led, with insufficient integration between housing delivery, infrastructure provision, and environmental considerations. Concerns are expressed regarding the lack of a clear, coherent strategy for how the area will function with increased population, as well as deficiencies in consultation, including limited access to information and insufficient engagement. There is a strong call for evidence based planning, including infrastructure audits, cumulative traffic assessments, and robust	objectives, rather than treated as a justification to halt strategic land use planning at a broader level. Similarly, in relation to NSO 8 (Transition to a Climate-Neutral and Climate Resilient Society) and NSO 9 (Sustainable Management of Environmental Resources), the Variation supports compact urban growth rather than dispersed development, which is inherently more sustainable and reduces long-term emissions associated with sprawl. While concerns regarding car dependency are noted, the concentration of development in areas such as Lucan and Adamstown—already served by bus networks and planned rail upgrades—represents a more sustainable alternative to peripheral or greenfield locations lacking any transport infrastructure. The Variation also facilitates the critical mass needed to justify and deliver future public transport improvements, including DART+ South West and BusConnects enhancements. In addition, environmental safeguards such as the SEA, SFRA, and Development Plan policies ensure that flood risk, biodiversity, and water management are addressed systematically. The call to pause rezonings until infrastructure is fully delivered, while understandable from a local perspective, does not reflect the reality of strategic planning and infrastructure delivery cycles, which must operate in parallel rather than sequentially. National policy explicitly recognises that housing and infrastructure must be planned in tandem, and that zoning must anticipate future needs rather than react only to existing conditions. Delaying zoning until all infrastructure is delivered would risk constraining housing supply, increasing costs, and potentially undermining national housing targets. Moreover, the Variation includes measures to activate existing zoned lands and

analysis of service capacity before further rezonings are considered. There is also an emphasis on the importance of plan led, infrastructure supported development, highlighting constraints such as electricity grid capacity and the need for integrated land use and transport planning. Overall, however, the dominant view across submissions is that the proposed variation risks undermining the principles of sustainable development, compact growth, and infrastructure led planning, as set out in national policy. The submissions also strongly emphasise that the current proposals do not adequately align with broader national objectives under Project Ireland 2040, particularly "NSO 10 – Access to quality childcare, healthcare, and education", with evidence presented that these services are already overstretched. Additionally, concerns are raised in relation to "NSO 7 – Enhanced Amenity and Heritage," with objections to the rezoning of lands such as St. Edmundsbury on the basis that they contribute to biodiversity, landscape character, and heritage value, and their loss would undermine environmental quality and local identity. Environmental considerations are further reinforced through reference to "NSO 8 – Transition to a Climate Neutral and Climate Resilient Society" and "NSO 9 – Sustainable Management of Environmental Resources," with submissions arguing	improve delivery, addressing concerns about underutilised capacity while also ensuring that sufficient land is available to meet future demand. Finally, while submissions advocate for prioritising brownfield development, the Variation does not preclude this and is complementary to ongoing initiatives such as City Edge and urban regeneration strategies such as the Tallaght Town Centre LAP. However, it is recognised in national policy that a combination of brownfield and greenfield development is required to meet housing demand, particularly in the short to medium term. The identification of additional lands in Lucan and the wider SDCC area reflects land availability, and proximity to existing infrastructure, making these lands more immediately deliverable than some complex brownfield sites. The lands identified have also be supported by the Office of the Planning Regulator. In summary, rather than conflicting with national policy, proposed Variation No. 2 can be viewed as a balanced and policy-aligned response to housing need, which supports compact growth, enables infrastructure planning, and provides the framework for sustainable long-term development. The issues raised in submissions, while valid in highlighting existing pressures, can be more appropriately addressed through phasing, infrastructure coordination, and the development management process, rather than through limiting the strategic zoning necessary to accommodate future population growth, with the specifics of the detail dealt with further in the report.

that continued car-dependent growth in the absence of adequate public transport and infrastructure will increase emissions, reduce resilience, and erode green infrastructure networks. There is a clear and consistent call to pause further rezonings in Lucan, prioritise the completion of existing SDZ developments, activate brownfield and vacant lands, and ensure that infrastructure delivery—particularly transport, utilities, and social services—precedes or at minimum keeps pace with housing development, in order to safeguard environmental quality, community wellbeing, and long-term sustainability.	
CE Recommendation It is recommended, specifically in response to the above submissions, that no changes or amendments are required to the lands identified under proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028, as none of the generalised issues or commentary that have been raised from the above would materially alter the outcome of the proposed Variation.	

General Comments and Miscellaneous Matters

Submission No.

SD-C401-CDP25-40 – Joy Graham	SD-C401-CDP25-110 – Anna Chrysovergi	SD-C401-CDP25-165 – David POWER
SD-C401-CDP25-171 – John O'Shea	SD-C401-CDP25-174 – David Doherty	SD-C401-CDP25-203 – David O'Reilly
SD-C401-CDP25-215 – Mark Donnelly-Orr	SD-C401-CDP25-216 – Amy Carroll	SD-C401-CDP25-355 – Jason Kavanagh
SD-C401-CDP25-363 – Owen O Brien	SD-C401-CDP25-377 – Mirela Iulia Zalaru	SD-C401-CDP25-388 – Robert Maloney
SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-446 – Fiachra Brennan	SD-C401-CDP25-455 – Elizabeth O'Reilly
SD-C401-CDP25-456 – Thomas O'Reilly	SD-C401-CDP25-462 – Ciara Dardis	SD-C401-CDP25-463 – Alan Tolan
SD-C401-CDP25-469 – Patricia Graham	SD-C401-CDP25-474 – Una Howley	SD-C401-CDP25-478 – Paul Donnelly
SD-C401-CDP25-502 – Bláthnaid O’Dwyer	SD-C401-CDP25-513 – Pam Peard	SD-C401-CDP25-520 – Simon Hand
SD-C401-CDP25-525 – Aisling Ainscough	SD-C401-CDP25-549 – Mirela Iulia Zalaru	SD-C401-CDP25-559 – Daniel O’Rourke
SD-C401-CDP25-576 – Magda Ghanim	SD-C401-CDP25-589 – Paul O'Rourke	SD-C401-CDP25-591 – Gerry McAndrew

SD-C401-CDP25-594 – Rupert Fuller	SD-C401-CDP25-596 – The Maritime Area Regulatory Authority (MARA)	SD-C401-CDP25-644 – Grace Carey
SD-C401-CDP25-648 – Diane Grogan	SD-C401-CDP25-649 – Westbury Court Residents Association	SD-C401-CDP25-748 – Alan Furlong
SD-C401-CDP25-772 – James Grogan	SD-C401-CDP25-776 – Mary Whittle	SD-C401-CDP25-777 – Little Folk Preschool
SD-C401-CDP25-783 – Sarah Owen	SD-C401-CDP25-825 – Jennifer Merriman	SD-C401-CDP25-830 – Kevin Lyons
SD-C401-CDP25-839 – Basil Hudson	SD-C401-CDP25-847 – Grace Lavery O'Reilly	SD-C401-CDP25-849 – Adrienne Sullivan
SD-C401-CDP25-851 – Derek Joyce	SD-C401-CDP25-877 – Irish Water	SD-C401-CDP25-884 – Dermot Keogh
SD-C401-CDP25-895 – Heather Hallinan	SD-C401-CDP25-910 – Patrycja Demianiuk	SD-C401-CDP25-912 – glenn roche
SD-C401-CDP25-969 – Dermot McGreal	SD-C401-CDP25-979 – Brian Foley	SD-C401-CDP25-1002 – Martin McHugh
SD-C401-CDP25-1041 – Transport Infrastructure Ireland	SD-C401-CDP25-1056 – Office of Public Works	SD-C401-CDP25-1070 – Bernardo Muchata
SD-C401-CDP25-1149 – Daniel Kochanski	SD-C401-CDP25-1152 – Maria Filatova	SD-C401-CDP25-1167 – Inland Fisheries Ireland
SD-C401-CDP25-1168 – Philip Murphy	SD-C401-CDP25-1173 – Tina Dwyer	SD-C401-CDP25-1219 – Denis Twohig

SD-C401-CDP25-1290 – Elzbieta Musial	SD-C401-CDP25-1291 – Ronan N	SD-C401-CDP25-1293 – Anum Alam Khan
SD-C401-CDP25-1294 – Ali Madras	SD-C401-CDP25-1297 – Audrey Smith	SD-C401-CDP25-1305 – Geraldine Lavin
SD-C401-CDP25-1314 – Miriam Whittle	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1375 – Office of the Planning Regulator
SD-C401-CDP25-1426 – Jack O'Sullivan	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage	SD-C401-CDP25-1442 – Paul Gogarty TD
SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1462 – Tessa Curran	SD-C401-CDP25-1475 – Patrick Brodie
SD-C401-CDP25-1502 – daa	SD-C401-CDP25-1513 – National Transport Authority	SD-C401-CDP25-1531 – John Lahart TD
SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail	SD-C401-CDP25-1574 – Ciarán Ahern TD	SD-C401-CDP25-1597 – Cllr Vicki Casserly
SD-C401-CDP25-1600 – Agnieszka Trzos	SD-C401-CDP25-1603 – John Devaney	SD-C401-CDP25-1605 – Eleonore McKinney
SD-C401-CDP25-1613 – Fintan Tait	SD-C401-CDP25-1618 – Paddy Keating	SD-C401-CDP25-1620 – Bhawna Rana
SD-C401-CDP25-1621 – Tomasz Lemanski	SD-C401-CDP25-1622 – Susan Phelan	SD-C401-CDP25-1639 – Carmel Callaghan

SD-C401-CDP25-1645 – Clare Hamilton	SD-C401-CDP25-1649 – Frank O'Leary	SD-C401-CDP25-1655 – LIONA O'TOOLE
SD-C401-CDP25-1664 – Knocklyon Network	SD-C401-CDP25-1666 – Shane Moynihan TD	SD-C401-CDP25-1676 – South Dublin Conservation Society
SD-C401-CDP25-1705 – Kirill Priadko	SD-C401-CDP25-1708 – Niamh Lacy	SD-C401-CDP25-1715 – Maria Murphy
SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1752 – John McGivney	SD-C401-CDP25-1772 – Philip Curran
SD-C401-CDP25-1776 – Chris Conway	SD-C401-CDP25-1777 – Una Mullaney	SD-C401-CDP25-1778 – Peter Coakley
SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG	SD-C401-CDP25-1802 – Kingswood Heights Residents Association NIA	SD-C401-CDP25-1895 – May O' Reilly Moore
SD-C401-CDP25-1899 – Bridget McEvoy	SD-C401-CDP25-2298 – Gráinne Hannon	SD-C401-CDP25-2309 – Elizabeth Griffin
SD-C401-CDP25-2324 – Florrie Dowling	SD-C401-CDP25-2357 – Jane Ryan	

Summary	CE Response
Statutory and Prescribed Bodies A number of submissions were received from a number of Prescribed and Statutory bodies. The submissions relate to the overall variation and the need to allocate additional zoned lands for residential purposes to support the implementation of the revised National Planning Framework.	**Statutory and Prescribed Bodies** The Planning Authority notes the submission from each of the Statutory and Prescribed Bodies, as well as their respective roles and responsibilities with respect their area of expertise. The responses have been noted and responded to by the Planning Authority under each of the relevant site-specific variations (where

The following is a list of bodies who response to the consultation and a brief overview of each of their roles and responsibilities with regard the Variation. **NPWS DoHLGH** The National Parks and Wildlife Service (NPWS) under the Department of Housing, Local Government and Heritage (DoHLGH) submit that six of the proposed rezonings involve the rezoning of the land concerned from Objective RU-Rural either in full or in part to Objectives RES-N New Residential or R-Existing Residential. Four other rezonings involve the rezoning of lands from (Objective OS-Open Space to RES-N or RES, while two other rezonings consist of the rezoning of lands from Objectives HA-LV High Amenity–Liffey Valley and HA-DV High Amenity Dodder Valley to respectively RES-N and Res Objectives. All these rezonings may be expected to reduce or at least modify to a considerable extent the biodiversity value of the lands concerned, it is submitted. **OPW** The OPW, as lead agency for the coordination of an integrated, 'whole-of-Government' approach to flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 2 to the South Dublin County Development Plan 2022-2028. The OPW submission is made specifically concerning flood risk management.	applicable) and are generally noted and welcomed to aid the assessment of same. **NPWS DoHLGH** The Planning Authority acknowledges the submission made by the NPWS and notes the provisions set out therein. Please see CE Summary / Responses above in relation to NPWS related issues relating to specific Amendments as proposed. **OPW** The Planning Authority acknowledges the submission made by the OPR and notes the provisions set out therein. Please see CE Summary / Responses above in relation to Flooding and SFRA issues relating to specific Amendments as proposed. **Iarnród Éireann** The Planning Authority welcomes and notes the submission from Iarnród Éireann and its clear support for Transport Oriented Development (TOD) and the coordinated delivery of housing in accordance with the Sustainable Residential Development and Compact Settlements Guidelines and the South Dublin County Development Plan 2022–2028. The recognition of key strategic growth areas, including Adamstown and Clonburris SDZs and the wider rail corridor, is acknowledged as aligning with the Council's approach to facilitating compact growth and sustainable urban development, as well as the implementation of the revised NPF. The Council supports Iarnród Éireann's outline of the DART+ South West programme, which will deliver a high-capacity, electrified rail service with significantly increased frequency between Hazelhatch & Celbridge and the city centre. This level of service provision is critical in

The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), and the preparation of a Strategic Flood Risk assessment (SFRA). The OPW notes and welcomes that SFRA review of proposed zoning changes includes assessment against High End Future Scenario 0.1% extents, and that where potential future risk has been identified, development that would be inappropriate to the potential future risk has been avoided. **Iarnród Éireann** Iarnród Éireann supports Transport Orientated Development, delivering housing at scale in accordance with the Sustainable Residential Development and Compact Settlement Guidelines (2024) and South Dublin City Development Plan 2022 2028, on lands where major rail capacity upgrades are planned, such as at Kylemore, Adamstown and Clonburris strategic development areas. It is submitted that DART+ South West will deliver a high capacity modern electrified transport system along the rail line between Hazelhatch & Celbridge and city centre stations, with DART trains up to every 6 minutes to serve existing residents and new homes and employment opportunities.	supporting modal shift, reducing car dependency, and enabling higher-density, transit-led development in appropriate locations. The integration of land use and transport planning is a key objective of the Development Plan, and the DART+ programme represents a cornerstone of this strategy. South Dublin County Council strongly welcomes Iarnród Éireann's support for the Council's forward planning objectives, particularly its statement supporting the realisation of the full benefits of DART+ South West, TOD, and the delivery of housing to meet current and projected demand as per the NPF requirements. The Council also welcomes the commitment to ongoing engagement and collaboration, which will be essential to ensuring the coordinated delivery of transport infrastructure and land use development. The Planning Authority further endorses Iarnród Éireann's position regarding the urgency and opportunity to advance the delivery timeframe of DART+ South West, potentially restoring it closer to its previous programme. The Council similarly considers the timely delivery of this infrastructure to be of critical importance in supporting housing delivery targets and enabling sustainable growth across South Dublin and the wider metropolitan area. This position is reflected in the inclusion of Specific Local Objectives (SLOs) within the Variation, which explicitly link the progression of development to the delivery of key transport infrastructure, including DART+ South West. **IFI** The Planning Authority acknowledges the submission made by the IFI and notes the provisions set out therein. Please see CE Summary / Responses above in relation to IFI (SEA, AA, SFRA) related issues relating to specific Amendments as proposed.

Iarnród Éireann supports South Dublin City Council's forward planning objectives to realise the full benefits of DART+ South West, Transport Orientated Development and the planning and provision of homes in response to current and projected demand. It welcomes further engagement with South Dublin City Council for effective planning and delivery of both DART+ South West to support the SDCC Development Plan. IÉ suggests that there is both an urgency and an opportunity for Government to bring DART+ South West closer to its previous pre-2025 NDP timeframe for delivery (opening in 2032) in order to support the housing targets and forward planning objectives of SDCC, DCC and Kildare County Council. The All-Island Strategic Rail Review (A-ISRR), jointly commissioned by the Department of Transport in Ireland and the Department for Infrastructure in Northern Ireland, recommends that railway boundaries are protected to ensure that the recommendations such as constructing double tracks or installing passing loops, electrification and realignment to improve speeds are not impeded. It is further submitted that it is essential that land use and zoning objectives adjacent to railways do not compromise future rail network improvements.	With regard to comments relating to the EU Nature Restoration Law and Regulation, given the ongoing preparation of the National NRP that is due in Sept 2026, provisions should be integrated in to the CDP when this is available. With regard to urban ecosystems, an aim of the Regulation is to ensure that the coverage of urban green spaces, in particular trees, will no longer be at risk of being reduced. Achieving this can be done by integration of green infrastructure and nature based solutions plus green roofs etc. Measures such as parks, gardens, hedges, pond, watercourses can be implemented for urban ecosystems under Annex VII of the Regulations. It is also noted that the Annex states that such measures should account for local conditions, native species and climate change resilience. The mitigation measures for sites identified in the Proposed Variation specifically supports the retention of existing woodland features including hedgerows and treelines where present. Furthermore, some of the lands are identified as requiring master planning in advance and the Planning Authority will support provision of parks, trees, tree lined streets, urban meadows, watercourses and so on based on the ecological surveys that will be required as part of future master planning of lands. As part of the SEA and AA, the CDP 2022-2028 supports GI and multifunctional networks through: *Policy GI1: Overarching* *Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams*

IFI Inland Fisheries Ireland (IFI) submit that their principal function of is the protection, management, and conservation of the inland fisheries resource. IFI submit that the SEA report does not fully consider the legal requirements set out in the EU Nature Restoration Law and Regulation (Regulation (EU) 2024/1991) which combine an overarching restoration objective for the long-term recovery of nature in the EU's land and sea areas with binding restoration targets for specific habitats and species. IFI refer to the EU Water Framework Directive (WFD) (2000/60/EC) establishes a framework for the protection of both surface and groundwater. The maintenance of all approved SuDS infrastructure both, existing and future is not considered when reviewing flood potential implications for the proposed Variation No.2, it is submitted. IFI note the ever-increasing occurrences of surcharging from CSO's throughout the greater Dublin area including SDCC. Major investment is required to upgrade all necessary infrastructure before any future large-scale development is approved, it is submitted. **DoEY** The Department of Education and Youth (DoEY) indicates that their preference would be to expand	*that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.* *Policy GI2: Biodiversity* *Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021- 2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF)and the East Region Spatial and Economic Strategy (RSES).* Having regard to the issues raised relating the conveyancing of wastewater, it is considered that this is more appropriately addressed through Uisce Éireann and existing policy provisions of SDCC in relation to wastewater. **DoEY** The Planning Authority acknowledges the submission made by the DoEY and notes the provisions set out therein. The Planning Authority will continue to engage with the Department on a regular basis to actively review school needs and proposals to ensure adequate school places are delivered and planned for, in accordance with the needs and research undertaken by the Department, in accordance with overarching Policy COS8 and other related policies and objectives set out in the CDP 2022-2028. Please see CE Summary / Responses above to Schools related issues relating to specific Amendments as proposed.

existing facilities, if possible, should there be a requirement for additional school places resulting from planned population increases. In this regard, the department requests the Planning Authority to examine the potential of protecting a land buffer around each school to enable them to expand further if required. In terms of the identification of future school place requirements that necessitates the need for the reservation and acquisitions of sites for future new schools or the requirement of new sites to facilitate the relocation of existing schools, the department highlights the following: • It is generally considered that schools are enabling infrastructure for housing and should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. • Community facilities and amenities should also be positioned close to school facilities. • Infrastructure required should be provided in advance of the need for such schools. • The department anticipates that additional Special Education Needs provision at both primary and post primary level will be required in the future throughout the country. • The Ukrainian crisis has the ability to put undue pressure on school place provision and	The Planning Authority note the request to examine the potential of protecting a land buffer around each school to enable them to expand further if required. It is considered more appropriate to consider any such requests during the wider County Development Plan review process. **ESB** The Planning Authority acknowledges the submission made by ESB and notes the provisions set out therein. The Planning Authority will continue to engage with the ESB and all relevant stakeholders to protect existing electricity infrastructure and enhance the electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments in accordance with Policy IE6 and the objectives set out thereunder in the CDP 2022-2028. Please see CE Summary / Responses above in relation to ESB / Utilities issues relating to specific Amendments as proposed. **TII** The Planning Authority acknowledges the submission made by TII and notes the provisions set out therein. The Planning Authority will continue to engage with TII and all relevant stakeholders in relation to strategic and local transportation issues including delivery of transport projects in accordance with SM1 Objective 7 and other related policies and objectives set out in CDP 2022-2028. Please see CE Summary / Responses above in relation to Traffic and Roads related issues relating to specific Amendments as proposed. **MARA** The Planning Authority notes the submission from MARA, and it is considered that there are no implications arising from the submission for variation sites.

could necessitate reassessments of school place provision. **ESB** The Electricity Supply Board (ESB) provides an overview of their wider strategy, noting that it is the largest supplier of renewable electricity in Ireland and with a stated objective to develop and connect renewables to decarbonise the electricity system by 2040, consistent with the NPF and RSES. Submission notes that under the 2025 National Development Plan (NDP) Review, the Government has committed €3.5 billion in equity funding to ESB Networks and EirGrid to significantly enhance grid capacity and resilience. This investment is strategically aligned with the goal of delivering 300,000 new homes by 2030 and meeting Ireland's climate and competitiveness targets. As part of ESB Network's Price Review 6 (PR6) 2026-2030 substantial infrastructure investments are proposed at all voltage levels with a particular emphasis on the 110kV stations. ESB indicate that they currently own and operate 31 high-voltage substations within the county boundaries. These facilities are strategically distributed throughout the county and constitute a critical element of ESB's operational infrastructure, both regionally and nationally.	**UE** The Planning Authority welcomes and notes the response to the variation from UE. The detail of the submission is dealt with on a site by site basis, whereby SDCC has noted the information provided by UE in response to the infrastructure required for a site. In some instances, an SLO has been applied to a site to ensure that the water and wastewater network upgrades necessary to serve the variation lands and zoned lands in the surrounding area are agreed with UE in advance of the submission of a planning application. **DAA** The Planning Authority notes and welcomes the submission and engagement from the DAA, noting the reference to Fingal County Council's Development Plan. SDCC considers the safeguarding presently set out in the SDCC CDP as adequate and appropriate in respect of the sites mentioned in the DAA responses to the variation. **Procedural Matters** *Indicative Number Query* The Planning Authority presented indicative unit numbers to Cllrs twice and via the Planning and Transportation SPC meeting on 26/2/2026. These numbers are indicative only and utilise the Compact Settlement Guidelines to set ranges and provide indicative numbers. Finalised numbers will be established through the Planning Application process and will be assessed under the same process, this is why no official numbers were published at the consultation events or in the final book of maps, however residents and attendees were invited to review the Written Statement and revised Core Strategy Table to understanding revised unit allocations for settlements.

ESB refer to Castlebaggot 220kV installation which serves as a key bulk supply point for South Dublin and the wider Dublin Region. It is requested that the operational lands at Castlebaggot and the long-term operational requirements of existing utilities are protected as they are indispensable in accommodating future infrastructure requirements. It is submitted that presently, the grid is restricted by insufficient capacity to accommodate additional demand, highlighting an urgent need for significant reinforcement of both the transmission and distribution networks within South Dublin. ESB indicate that failure to resolve these limitations will hinder the achievement of the future growth targets outlined by the proposed Variation No. 2. It is submitted that several network reinforcement initiatives are currently underway or being evaluated throughout South Dublin to address substation capacity constraints and maintain security of supply. ESB submits that they are committed to proactively engaging with South Dublin County Council as these revised housing targets are incorporated into the County Development Plan. ESB acknowledges the collaboration with SDCC in the delivery of electricity infrastructure to date and calls for an intensification of their coordination efforts. This will be necessary to identify and secure suitable sites for the	*Rezoning Process and Instruction* The Planning Authority acknowledges the concerns raised in submissions regarding the rationale for the proposed variation and the perception that the rezoning process is being expedited at the expense of established planning principles. In this regard, it is important to clarify that the variation process is being undertaken in response to national policy direction issued by the Department of Housing, Local Government and Heritage and the Minister for Housing. This includes Section 28 Planning Guidelines, which planning authorities are statutorily required to have regard to, and which provide the policy framework for implementing the revised National Planning Framework (NPF). *Consultation Process* The Planning Authority notes the comments and submissions related to the variation process and the suggestions for future County Development Plans. The wishes to draw attention to the level of consultation which took place as part of this variation, including 'non-statutory' consultation, and two drop in sessions, at County Hall and Lucan Library. The variation was done in compliance with the relevant section of the Act. In response to the submissions made with respect the Knocklyon Network and the Ballyboden Tidy Towns group, the Planning Authority acknowledges the level of ongoing consultation in South Dublin, and notes that not all consultations are from within the Planning Department. In addition to this, the Planning Authority notes the requirements of the Aarhus Convention with regard consultation and access. The Aarhus Convention requires that the public be informed, consulted

development of key electricity infrastructure to support additional housing targets. ESB indicate that early engagement at design stage of key public infrastructure projects, such as new roads, public realm upgrades and greenways offers opportunities to incorporate ducting and cabling in an economically efficient way while minimising disruption. ESB indicate that, at a localised level, it has undertaken a comprehensive review of the Medium and Low Voltage (MV/LV) network throughout SDCC, to determine where upgrades or the provision of additional unit substations may be necessary. The objective is to support the decarbonisation of the electricity network and to facilitate the transition of customers to Low Carbon Technologies including heat pumps, solar photovoltaic systems, and electric vehicle charging infrastructure. **TII** Transport Infrastructure Ireland (TII) sets out its role in safeguarding the strategic function of National Roads and Luas to ensure the safe and efficient operation of the national roads network. TII seeks to ensure that national roads network objectives are not undermined and that the anticipated benefits of the investment made in the national roads network are not jeopardised.	early, given real opportunities to participate, and have their views taken into account in environmental decision-making. The SDCC variation was carried out in compliance with these principles and the relevant consultation requirements of the Planning and Development Act, adhering to prescribed timelines, making all documents available both in person and online, and facilitating engagement through two drop-in sessions as well as a non-statutory consultation in advance of the formal process. *CPO Utilisation* The Planning Authority notes the submission relating to the suggestion to utilise CPO and SDZ approaches to delivery housing, however SDCC was required to undertake a process as set out in the Section 28 Guidelines to zone additional lands. SDCC followed this process. SDCC does not rule out the utilisation of CPO in future, where appropriate, and furthermore will utilise framework plans (UDZ, Priority Area Plans and so on) as required. **Other Matters** *City Edge and Brownfield, Town Centre Regeneration Greenfield and Brownfield (Climate response)* The Council notes the concern around the development of greenfield over brownfield lands. In assessing the appropriateness of residential zoning, the Planning Authority is guided by the shared goals identified in the NPF and RSES as National Strategic Outcomes and Regional Strategic Outcomes, namely the achievement and delivery of Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society. Specially, this includes: • Priority growth areas specified in the Metropolitan Area Strategic Plan

Reference is made to relevant objectives in the NPF (NPO 107) and the RSES, including the guiding principle of: • the maintenance and protection of the strategic function of the national road networks and associated junctions. • promotion of the management and enhancement of strategic land transport networks, including by travel demand management. Reference is made in the submission to GDA Transport Strategy Measures ROAD1 and ROAD2 which similarly recognise the need to protect the function of the national roads network in accordance with official national roads policy. Reference is made to: • Spatial Planning and National Roads Guidelines for Planning Authorities (2012) • Section 1.3 of the Design Manual for Urban Roads and Streets (DMURS) and Government's NGS Circular No. 2 of 2022 that require TII Publications standards apply to national roads and / or roads with extra urban speed limits is also indicated. TII positively acknowledges the stakeholder engagement by South Dublin County Council to date.	• Compact growth and infill development • Brownfield/greenfield • Proximity to centres of services and social infrastructure • Proximity to high-capacity public transport These parameters are applied by the Local Authority in tandem with the objectives of the South Dublin County Development Plan 2022–2028, as well as other relevant Section 28 Guidelines issued by the DHLGH. The Planning Authority is committed to Town Centre Regeneration and Brownfield regeneration, which can be seen in Tallaght town centre, and the implementation of the Tallaght Town Centre Local Area Plan, and the investment of €20m of URDF in the town centre and in Cookstown to activate lands. Furthermore, the Council is progressing variation 3 of the CDP to progress brownfield activation in City Edge. Overall, the Planning Authority considers this a balanced approach to development in response to the Section 28 Guidelines for NPF Implementation, with key considerations such as climate accounted for through objectives in the CDP and SDCC Climate Action Plan. *NSO and NPF Implementation* The Planning Authority notes the response with regard NSOs and their implementation. The approach for the variation is aligned with the first revision of the NPF and the relevant Section 28 Guidelines related to the implementation of same. These documents are in conformity and therefore set the parameters for the undertaking of this review and process. It is considered that the process undertaken by SDCC is in conformity with the Section 28 Guidelines and the revised NPF, notably the NPOs and NSOs applicable to the process and the subject

MARA The Maritime Area Regulatory Authority (MARA) submit that as the custodian and regulator of Ireland's maritime area, they aim to ensure that Ireland's marine environment is protected for the future through co-operation, compliance, enforcement and transparent decision making. MARA also indicate that they are satisfied that the proposed variation will not directly interact or impact on, the maritime area. On this basis, MARA has no further comments to make regarding proposed Variation No.2 within the scope of its statutory functions. **UE** A submission was received from Irish Water / UE. UE are Ireland's national regulated water utility, every day we are responsible for the delivery of secure, safe, and sustainable water services for the people of Ireland. **DAA** A submission was received from the Dublin Aviation Authority. DAA (styled daa) is a commercial semi-state airport company owned by the Irish State, headquartered at Dublin Airport, managing Dublin Airport, as well as Cork Airport and other commercial interests globally.	variation lands to ensure the proper planning and sustainable development of the functional area of South Dublin. *Parking Standards* The Planning Authority notes the concerns raised by submissions in respect of car parking standards. Car parking standards are set out in the County Development Plan, and applied appropriately subject to the context and location of a development, on a site by site basis. It is not related to the overall zoning of a site but a factor for the final design solution for any proposal, managed through the development management process. *Alternative Lands* The Planning Authority notes the suggestion that lands in other counties could be prioritised over SDCC lands. However, the Section 28 Guidelines issued from the Minister regarding NPF Implementation requests each Local Authority to review lands and zone additional lands in respect of revised housing figures. SDCC is ensuring it fulfils its statutory obligation through this proposed variation under the relevant Section 28 Guidelines. *Integration and Occupation of Zoning Lands* The Planning Authority notes the submission regarding integration and eventual occupation of future housing which culminate from the potential future variation lands, however it should be noted that once rezoned, the lands must undergo the various planning application processes, including design, environmental assessment, and review prior to submission. Furthermore, some of these lands are proposed Future SDA – and require future rezoning to support residential development – or may require the fulfilment of SLOs, which ensure in tandem delivery of infrastructure. Therefore, the timeline may be

Procedural Matters *Indicative Number Query* A submission was received with regard the (indicative potential unit) numbers not being shown on the Book of Maps are consultation event at Lucan Library, whilst indicative numbers were presented to Cllrs as part of a series of briefings. *Rezoning Process and Instruction* A number of submissions query the need for the proposed variation process, noting the government instruction to zone additional lands. Submissions also criticise the approach taken by government to deliver housing in an expediated manner, noting that basic / sound planning principles are being ignored in a rushed, politically driven approach to ensure targets are met. *Consultation Process* A number of submissions suggest that an improved and more open process be undertaken as part of any future/next consultation, such as the next Development Plan. Specific comments and similar comments received from both Knocklyon Network and Ballyboden Tidy Towns on the level of ongoing consultation and the ability for these groups to respond to the level of consultation currently ongoing. Submissions also raised the technical nature of the consultations as	longer to ensure compliance with a framework plan or SLO, however this is in the interest of proper planning and sustainable development. *Cumulative Transport Impacts* The Planning Authority notes the suggestions for a Park and Ride at the Spawell in the submissions. The location of Park and Ride facilities are done in consultation with the NTA. No such suggestion was made for such a facility by the NTA. Commentary regarding active travel routes are noted. These are also done in consultation with the NTA. All transport infrastructure projects and facilities are considered on a strategic basis, notably in the Greater Dublin Area Transport Strategy. *Orbital Route* The Planning Authority notes the suggestions regarding the Western Orbital Route, as set out in the CDP. The Council will continue to pursue said route in consultation with key stakeholders to ensure effective delivery strategically. *Community Character and Design* The Planning Authority notes the concern raised at the potential impact on the character of an area resulting from the design of future developments on the proposed variation lands. SDCC wishes to point out the SLOs applied to sites, include the requirement for masterplanning in specific cases, in addition to extensive policies, objectives and standards set out in the CDP which will shape future development. Furthermore, any key characteristics of area, existing built heritage such as designated ACAs and Protected Structures, or as raised through stakeholder engagement (internal and external) shall be considered during the preliminary design stage (pre-planning) and assessed during the development management / planning application processes.

well as reference the Aarhus Convention with respect to consultation. *CPO Utilisation* A submission suggests that SDCC Utilise CPO and SDZ style approaches to facilitate the delivery of additional housing. **Other Matters** *City Edge and Brownfield, Town Centre Regeneration Greenfield and Brownfield (Climate response)* A number of consultations flag concerns around the progression of greenfield land over brownfield land (including infill), as well as the impact this may have on climate change. Suggestions that the City Edge approach should be used, to progress town centre regeneration and regeneration of brownfield in the first instance. *NSO and NPF Implementation* Submissions were received with respect to NSOs and the overarching approach to the first revision of the NPF and implementation through the variation. *Parking Standards* A number of submissions highlight and refer to inadequate parking provision in relation to new developments within South Dublin, as well as access to same. *Alternative Lands*	*Residential Amenity* The Planning Authority notes the concern around residential amenity on a County wide level. Extensive policies, objectives and standards are set out in the CDP and Section 28 Guidelines which guide residential development in the County, ensuring residential amenity is protected. The Planning Authority also wishes to point out that additional SLO requirements have been applied where relevant which also protect residential and environmental amenity. *School Capacity and Provision* The Planning Authority notes the concern raised with regard school capacity and provision in respect of the proposed variation. The Planning Authority will continue to liaise with the DOEY to ensure school place provision and school delivery is aligned with any increased school place requirement as a result of the proposed variation to the CDP. *Community and Social Facilities* The Planning Authority notes the submissions regarding community and social facilities and notes the concern raised about adequate provision to reflect demand arising from increased housing and population. The variation has placed SLOs on certain sites to ensure a master plan led approach to development, in addition to a requirement for a Social Infrastructure Audit and Open Space Audit and provision within development proposals to address any identified needs. This is in addition to the provisions set out in the CDP, and the standards for community and social facilities, which will be applicable. *Affordable Housing and Cost Rental*

Submission was received with regard to the utilisation or progression of alternative lands in other counties over those in SDCC. *Integration and Occupation of Zoning Lands* Submissions received regarding the future integration of new housing and their perspective occupation. A submission noted the long timelines for their eventual occupation. *Cumulative Transport Impacts* Several submissions raise concern related to the cumulative transport impacts of the proposals, as well as note the potential for a Park and Ride at Spawell. They also submit that active travel infrastructure should complement new transport routes rather than be isolated pieces of infrastructure. *Orbital Route* A number of submissions point to the Western Orbital Route and the provision of additional road capacity. *Community Character and Design* Several submissions raise concern at the potential impact of the proposed variation sites on existing community character and that the design of same may not fully integrate into the existing area. *Residential Amenity*	The Planning Authority notes the submission with regard to housing affordability, housing tenure and affordable housing delivery. South Dublin will continue to utilise the Part V process, or any subsequent process available, or applicable under the new Planning and Development Act 2024 (as amended) to secure affordable housing. SDCC will also pursue all other mechanisms available to it to aid the delivery of affordable housing, as well as encouraging the delivery of other types and tenures of housing. *Development Plan Policies* The Planning Authority notes the submissions made regarding the implementation of the CDP policies. Development within the variation lands will be guided by the provisions of the CDP as amended, including SLOs where relevant, and the next Development Plan which will be a 10 year plan in accordance with the Planning and Development Act 2024 (as amended). Sites will be subject to robust assessment, including EIA and AA screening, compliance with the SLO (where applicable) and conformity with the relevant CDP in place. *Social Housing allocations* The Planning Authority notes the submissions made with regard social housing allocations; however, this is not the appropriate process with which housing is allocated or dealt with. It is considered that the information was submitted in error.

A number of submissions raised concern at residential amenity on a County wide scale, stating that new developments may have a negative impact on residential amenity in a variety of areas in SDCC. *School Capacity and Provision* A number of submissions raised concern at the need for additional school capacity and provision to reflect increased population. *Community and Social Facilities* A number of submissions flag concerns around the delivery of additional facilities to reflect increased demand and increased population, those specifically noted are health, sport, culture and civic facilities. *Affordable Housing and Cost Rental* A number of submissions raised the affordability of housing, affordable housing and the delivery of alternative types of tenure, such as Cost Rental. *Development Plan Policies* Submissions were received with regard the implementation of CDP policies irrespective of the zoning, noting environmental policies specifically. *Social Housing allocations* Query regarding social housing allocation – two queries were received from residents regarding social	

housing/housing allocations in response to the consultation.	
CE Recommendation It is recommended, specifically in response to the above submissions, that no changes or amendments are required to the Written Statement or to the lands identified under proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028, as no issues have been raised from the above that would materially alter the outcome of the proposed Variation.	

Section 4 – List of Submissions

SD-C401-CDP25-1 – Joey Byrne	*SD-C401-CDP25-2 – Igor Shcherba Shcherba*	*SD-C401-CDP25-3 – Stephen Nolan*
SD-C401-CDP25-4 – Aleksandra Dolhy	*SD-C401-CDP25-5 – Darragh Bacon*	*SD-C401-CDP25-6 – Miroslaw Kozina*
SD-C401-CDP25-7 – Antonia McDonnell	*SD-C401-CDP25-8 – Marc Fitzharris*	*SD-C401-CDP25-9 – Adrienne Darcy*
SD-C401-CDP25-10 – Andrew Darcy	*SD-C401-CDP25-11 – Jayaprakash Bhagyasree Bhagyasree*	*SD-C401-CDP25-12 – Eimear Crowther Crowther*
SD-C401-CDP25-13 – Brid Byrne	*SD-C401-CDP25-14 – Orlagh Keogh Keogh*	*SD-C401-CDP25-15 – Domenico Locatelli*
SD-C401-CDP25-16 – Igor Shcherba Shcherba	*SD-C401-CDP25-17 – Igor Shcherba Shcherba*	*SD-C401-CDP25-18 – Adam McManus*
SD-C401-CDP25-19 – David McCormack	*SD-C401-CDP25-20 – David McCormack*	*SD-C401-CDP25-21 – David McCormack*
SD-C401-CDP25-22 – Regina McManus	*SD-C401-CDP25-23 – James McCann*	*SD-C401-CDP25-24 – Donncha McManus*
SD-C401-CDP25-25 – Deirdre Sadler	*SD-C401-CDP25-26 – Caoimhe McManus*	*SD-C401-CDP25-27 – Aleksandr Novak*
SD-C401-CDP25-28 – Irena Stoicka	*SD-C401-CDP25-29 – Tracy Walsh*	*SD-C401-CDP25-30 – David Lane*
SD-C401-CDP25-31 – Iryna Danilova	*SD-C401-CDP25-32 – Graham Forde*	*SD-C401-CDP25-33 – Matthew McCann*
SD-C401-CDP25-34 – Brian Holland	*SD-C401-CDP25-35 – Lauren Markey*	*SD-C401-CDP25-36 – Daren O Brien*

SD-C401-CDP25-37 – Sarah Foley	SD-C401-CDP25-38 – danielle cole	SD-C401-CDP25-39 – Jorge Collado
SD-C401-CDP25-40 – Joy Graham	SD-C401-CDP25-41 – Ilya Ustinov	SD-C401-CDP25-42 – Kate Taylor
SD-C401-CDP25-43 – Matthew McCann	SD-C401-CDP25-44 – Ciaran Henry	SD-C401-CDP25-45 – Nicola Henry
SD-C401-CDP25-46 – Ruth French	SD-C401-CDP25-47 – Sinead Nolan Nolan	SD-C401-CDP25-48 – Andrew Finn
SD-C401-CDP25-49 – DEBBIE O'BRIEN	SD-C401-CDP25-50 – Eoin Mcnulty	SD-C401-CDP25-51 – David McNamara
SD-C401-CDP25-52 – Ravi Jadar	SD-C401-CDP25-53 – Mark Sheridan	SD-C401-CDP25-54 – Laura Tracey
SD-C401-CDP25-55 – Catherine Coyne	SD-C401-CDP25-56 – Cathal Nolan	SD-C401-CDP25-57 – James Connolly
SD-C401-CDP25-58 – John roche	SD-C401-CDP25-59 – Chris Bligh	SD-C401-CDP25-60 – Janice Walsh
SD-C401-CDP25-61 – Eimear Scully	SD-C401-CDP25-62 – Patrick Kenna	SD-C401-CDP25-63 – George White
SD-C401-CDP25-64 – Jessica Molloy	SD-C401-CDP25-65 – Tracy Malone	SD-C401-CDP25-66 – Lisa Scahill
SD-C401-CDP25-67 – Rose Murray	SD-C401-CDP25-68 – Michelle Murphy	SD-C401-CDP25-69 – Nicky Weir
SD-C401-CDP25-70 – Emmet Rafferty	SD-C401-CDP25-71 – Emmet Rafferty	SD-C401-CDP25-72 – Veron Tavey
SD-C401-CDP25-73 – Julieann Byrne	SD-C401-CDP25-74 – Sophie Henry	SD-C401-CDP25-75 – Kathryn Murray
SD-C401-CDP25-76 – Janaina Oliveira	SD-C401-CDP25-77 – Vani Halepet	SD-C401-CDP25-78 – Diane O'Connell
SD-C401-CDP25-79 – Fiona Martin	SD-C401-CDP25-80 – Fiona Wallace	SD-C401-CDP25-81 – Ella Marten

SD-C401-CDP25-82 – Rachel Tuohy Tuohy	SD-C401-CDP25-83 – Aisling Murphy	SD-C401-CDP25-84 – Katie O'Shaughnessy
SD-C401-CDP25-85 – James Delaney	SD-C401-CDP25-86 – Tom Tuohy	SD-C401-CDP25-87 – Noelle Whelan
SD-C401-CDP25-88 – Brian Fagan	SD-C401-CDP25-89 – Francisca Moules Darcy	SD-C401-CDP25-90 – Lawrence Dunne
SD-C401-CDP25-91 – Maureen Dunne	SD-C401-CDP25-92 – Jagadish Mahadevan	SD-C401-CDP25-93 – Nic Crocker Nic Crocker
SD-C401-CDP25-94 – Julie Monahan	SD-C401-CDP25-95 – Kate Henry	SD-C401-CDP25-96 – Darren Brennan
SD-C401-CDP25-97 – Emily Kinsella McMahon	SD-C401-CDP25-98 – Kate McMahon	SD-C401-CDP25-99 – Alicia Carroll
SD-C401-CDP25-100 – Margaret Faherty	SD-C401-CDP25-101 – Thomas Woods	SD-C401-CDP25-102 – Leanne Malone
SD-C401-CDP25-103 – Ian Smallman	SD-C401-CDP25-104 – Kim McCrave	SD-C401-CDP25-105 – Clare Strickland
SD-C401-CDP25-106 – Marcia McDonagh	SD-C401-CDP25-107 – Mark Sheridan	SD-C401-CDP25-108 – Sile Dooley
SD-C401-CDP25-109 – Mark Kavanagh	SD-C401-CDP25-110 – Anna Chrysovergi	SD-C401-CDP25-111 – Fintan Ward
SD-C401-CDP25-112 – Elaine McConnell	SD-C401-CDP25-113 – Mark McConnell	SD-C401-CDP25-114 – Joe Byrne
SD-C401-CDP25-115 – Phil Tavey	SD-C401-CDP25-116 – Áine Byrne	SD-C401-CDP25-117 – Brid McCormack

SD-C401-CDP25-118 – Aoife Flood	SD-C401-CDP25-119 – Maude Mcmenamin	SD-C401-CDP25-120 – Anya Dunne
SD-C401-CDP25-121 – Hanna Varghese	SD-C401-CDP25-122 – julieanne anderson	SD-C401-CDP25-123 – Sara Devine
SD-C401-CDP25-124 – Isabella Fitzsimons	SD-C401-CDP25-125 – Carmel Adderley	SD-C401-CDP25-126 – Laoibhse Curtis
SD-C401-CDP25-127 – Deborah Ilori	SD-C401-CDP25-128 – Lisa Flynn	SD-C401-CDP25-129 – Aoibheann Mcshea
SD-C401-CDP25-130 – Eimear Tracy	SD-C401-CDP25-131 – Ian Flynn	SD-C401-CDP25-132 – Anthony O'Neill
SD-C401-CDP25-133 – Shane Regazzoli	SD-C401-CDP25-134 – Tanya MacDermott	SD-C401-CDP25-135 – Aisha Ali
SD-C401-CDP25-136 – Catherine McAuley	SD-C401-CDP25-137 – Nicola O Gara	SD-C401-CDP25-138 – Leanne Ryan
SD-C401-CDP25-139 – Katherine Fry	SD-C401-CDP25-140 – Richard Adderley	SD-C401-CDP25-141 – sarah tavey
SD-C401-CDP25-142 – SURESH KRISHNAN	SD-C401-CDP25-143 – Marian Brennan	SD-C401-CDP25-144 – Darragh Kirby
SD-C401-CDP25-145 – Emma Gorman	SD-C401-CDP25-146 – Orla Kelly	SD-C401-CDP25-147 – Conor OShea
SD-C401-CDP25-148 – Cronan Dooley	SD-C401-CDP25-149 – Áine Gallagher	SD-C401-CDP25-150 – Kedar Baratam
SD-C401-CDP25-151 – swapni padamwar	SD-C401-CDP25-152 – Babar Sherwani	SD-C401-CDP25-153 – Isabel Arboleda
SD-C401-CDP25-154 – David Ward	SD-C401-CDP25-155 – Graham O'Brien	SD-C401-CDP25-156 – Stephen Malone
SD-C401-CDP25-157 – Zelda Cunningham	SD-C401-CDP25-158 – Aidana Kappar	SD-C401-CDP25-159 – Milosz Konczarek

SD-C401-CDP25-160 – Rory Thynne	SD-C401-CDP25-161 – Rory Thynne	SD-C401-CDP25-162 – Allan Dwyer
SD-C401-CDP25-163 – Rory Thynne	SD-C401-CDP25-164 – Rory Thynne	SD-C401-CDP25-165 – David POWER
SD-C401-CDP25-166 – Elaine O'Hare	SD-C401-CDP25-167 – Sharon Carroll	SD-C401-CDP25-168 – Róise Tavey
SD-C401-CDP25-169 – John O'Shea	SD-C401-CDP25-170 – Kevin Donoghue	SD-C401-CDP25-171 – John O'Shea
SD-C401-CDP25-172 – F Croke	SD-C401-CDP25-173 – Irene OShea	SD-C401-CDP25-174 – David Doherty
SD-C401-CDP25-175 – Joanna Faughnan	SD-C401-CDP25-176 – Emer Dunne	SD-C401-CDP25-177 – Anand RAJAGOPALAN
SD-C401-CDP25-178 – NIranjana Rajagopalan	SD-C401-CDP25-179 – Kate Blanchfield	SD-C401-CDP25-180 – Holly Enright
SD-C401-CDP25-181 – Tony O Dowd	SD-C401-CDP25-182 – Terri Moloney	SD-C401-CDP25-183 – Kelley Dunleavy
SD-C401-CDP25-184 – Sean Young	SD-C401-CDP25-185 – Caroline Hogarty	SD-C401-CDP25-186 – Danijela Klopotan
SD-C401-CDP25-187 – Lakshyajit Baruah	SD-C401-CDP25-188 – Paddy Scully	SD-C401-CDP25-189 – Ciarán Scully
SD-C401-CDP25-190 – Dara-Jane Ruane	SD-C401-CDP25-191 – nial Caffrey	SD-C401-CDP25-192 – nial Caffrey
SD-C401-CDP25-193 – Hazel Caffrey	SD-C401-CDP25-194 – Raymond Stallings	SD-C401-CDP25-195 – Michael Kelly
SD-C401-CDP25-196 – Noeleen Harte	SD-C401-CDP25-197 – Simon Dowling	SD-C401-CDP25-198 – Brian Richardson
SD-C401-CDP25-199 – Denise Carney	SD-C401-CDP25-200 – Sofia Alberty	SD-C401-CDP25-201 – ray Oconnell

SD-C401-CDP25-202 – Carol Palmer	SD-C401-CDP25-203 – David O'Reilly	SD-C401-CDP25-204 – Kenneth Maguire
SD-C401-CDP25-205 – Amanda Higgins	SD-C401-CDP25-206 – Louise Heffernan	SD-C401-CDP25-207 – Fiona Smyth
SD-C401-CDP25-208 – Anthony Keogh	SD-C401-CDP25-209 – Rachel Tobin	SD-C401-CDP25-210 – Emmet Rafferty
SD-C401-CDP25-211 – jorgea rafferty	SD-C401-CDP25-212 – Jennifer Egan Egan	SD-C401-CDP25-213 – Jennifer Blighe
SD-C401-CDP25-214 – Maureen Young	SD-C401-CDP25-215 – Mark Donnelly-Orr	SD-C401-CDP25-216 – Amy Carroll
SD-C401-CDP25-217 – Claire Cagney Cagney	SD-C401-CDP25-218 – Paul Southern	SD-C401-CDP25-219 – Malachy Tuohy
SD-C401-CDP25-220 – Shay Moriarty	SD-C401-CDP25-221 – Emmalene Kennedy Kennedy	SD-C401-CDP25-222 – Nischal Ramesh
SD-C401-CDP25-223 – Jakub Madzelewski	SD-C401-CDP25-224 – John Brennan	SD-C401-CDP25-225 – A Malone
SD-C401-CDP25-226 – Darragh Robinson	SD-C401-CDP25-227 – Emma Gavin	SD-C401-CDP25-228 – Denise Collins
SD-C401-CDP25-229 – Margaret Dennehy	SD-C401-CDP25-230 – Lisa Breslin	SD-C401-CDP25-231 – Anne Sullivan
SD-C401-CDP25-232 – Agnieska Nieduelaic	SD-C401-CDP25-233 – Alan McKiernan	SD-C401-CDP25-234 – Eamon McKiernan

SD-C401-CDP25-235 – Karoline Sheehan Sheehan	SD-C401-CDP25-236 – Catherine Murphy	SD-C401-CDP25-237 – marcus o'carroll
SD-C401-CDP25-238 – Ian Boyle	SD-C401-CDP25-239 – Joe Reynolds	SD-C401-CDP25-240 – John Farrell
SD-C401-CDP25-241 – Kieran Farrell	SD-C401-CDP25-242 – desmond kelly	SD-C401-CDP25-243 – Mary Geraghty
SD-C401-CDP25-244 – Michael Mahon	SD-C401-CDP25-245 – Paul Henry	SD-C401-CDP25-246 – Catherine Kelly
SD-C401-CDP25-247 – Robert McMahon	SD-C401-CDP25-248 – Ciara O Carroll	SD-C401-CDP25-249 – Gavin Pacini
SD-C401-CDP25-250 – Ciarán Butler	SD-C401-CDP25-251 – Sheena Bolger	SD-C401-CDP25-252 – Ruth Keane Reid
SD-C401-CDP25-253 – Stephen Bennet	SD-C401-CDP25-254 – Gillian Gilbert	SD-C401-CDP25-255 – Des Morley
SD-C401-CDP25-256 – Mirna Salamon	SD-C401-CDP25-257 – Graham Martin	SD-C401-CDP25-258 – Greg Lonergan
SD-C401-CDP25-259 – Paul mcentee	SD-C401-CDP25-260 – Ursula Feeney	SD-C401-CDP25-261 – Philip Jordan
SD-C401-CDP25-262 – Cillian Doyle	SD-C401-CDP25-263 – ASHAIL MAHARAJ	SD-C401-CDP25-264 – Patricia Rochford
SD-C401-CDP25-265 – Keith Graham	SD-C401-CDP25-266 – Sarah Murphy	SD-C401-CDP25-267 – Tina Lewis
SD-C401-CDP25-268 – Alison Crowe	SD-C401-CDP25-269 – Jackie Prendergast	SD-C401-CDP25-270 – Ciara Murphy
SD-C401-CDP25-271 – Jim Hand	SD-C401-CDP25-272 – James Murphy	SD-C401-CDP25-273 – Patrick Bradshaw

SD-C401-CDP25-274 – Renata Futo	SD-C401-CDP25-275 – Catherine Murphy	SD-C401-CDP25-276 – Malgorzata Lorek Lorek
SD-C401-CDP25-277 – Molly Mc	SD-C401-CDP25-278 – Nicola Duffy	SD-C401-CDP25-279 – Jennifer Rafter
SD-C401-CDP25-280 – Jennifer Rafter	SD-C401-CDP25-281 – Pauline Thornton Thornton	SD-C401-CDP25-282 – John Kelly
SD-C401-CDP25-283 – Colin Bond	SD-C401-CDP25-284 – Colin Bond	SD-C401-CDP25-285 – Trisha Duffy-Barber
SD-C401-CDP25-286 – Joe Lennon	SD-C401-CDP25-287 – David Lombard	SD-C401-CDP25-288 – Thomas O' Hare
SD-C401-CDP25-289 – Paula Doyle	SD-C401-CDP25-290 – Paula Slavin	SD-C401-CDP25-291 – Elaine O' Hare
SD-C401-CDP25-292 – Alan Brady	SD-C401-CDP25-293 – Darren Nolan	SD-C401-CDP25-294 – Roisin Mills
SD-C401-CDP25-295 – Suzanne Andrews	SD-C401-CDP25-296 – Philomena Burke	SD-C401-CDP25-297 – Sonia McKiernan
SD-C401-CDP25-298 – Billy Rafter	SD-C401-CDP25-299 – Marie Manders	SD-C401-CDP25-300 – mark harewood
SD-C401-CDP25-301 – Terry Keane	SD-C401-CDP25-302 – Teresa Lynch	SD-C401-CDP25-303 – Emmet Grant
SD-C401-CDP25-304 – Tom O' FGlynn	SD-C401-CDP25-305 – Weston Airport	SD-C401-CDP25-306 – aoife rafter
SD-C401-CDP25-307 – David Francis	SD-C401-CDP25-308 – Michael Dwyer	SD-C401-CDP25-309 – Mario Ilha
SD-C401-CDP25-310 – Neasa Henry	SD-C401-CDP25-311 – Ann Crowley	SD-C401-CDP25-312 – Gary Conroy

SD-C401-CDP25-313 – Jennifer Harte	SD-C401-CDP25-314 – Mridula Kandavel	SD-C401-CDP25-315 – Meaghan Kelly
SD-C401-CDP25-316 – Priya Arvind	SD-C401-CDP25-317 – Yvette Robinson Robinson	SD-C401-CDP25-318 – Fearghal Lawlor
SD-C401-CDP25-319 – Ronan Dunne	SD-C401-CDP25-320 – Karl Meehan	SD-C401-CDP25-321 – Kate McMahon
SD-C401-CDP25-322 – Veronica O Callaghan	SD-C401-CDP25-323 – Joanne Fitzpatrick	SD-C401-CDP25-324 – Katie Costello
SD-C401-CDP25-325 – Cathal ODonnell	SD-C401-CDP25-326 – Sean Keane	SD-C401-CDP25-327 – Erica Sullivan
SD-C401-CDP25-328 – Gerard Clarke Clarke	SD-C401-CDP25-329 – Vera Potoraca	SD-C401-CDP25-330 – Sarah McDermott
SD-C401-CDP25-331 – Hugh McKiernan	SD-C401-CDP25-332 – Donal Begley	SD-C401-CDP25-333 – Ruby Devlin
SD-C401-CDP25-334 – Kieron Byrne	SD-C401-CDP25-335 – ian mclaughlin	SD-C401-CDP25-336 – Kieron Byrne
SD-C401-CDP25-337 – Kieron Byrne	SD-C401-CDP25-338 – Kieron Byrne	SD-C401-CDP25-339 – Alyson Brady
SD-C401-CDP25-340 – Dolores Donnelly	SD-C401-CDP25-341 – Catherine Lane	SD-C401-CDP25-342 – Marian Laffan
SD-C401-CDP25-343 – Dijo Joseph	SD-C401-CDP25-344 – Ivona Ní Luain	SD-C401-CDP25-345 – Eileen Sheahan-mclaughlin
SD-C401-CDP25-346 – Patricia Greene	SD-C401-CDP25-347 – Jacqueline Cable	SD-C401-CDP25-348 – Paul Bohan

SD-C401-CDP25-349 – Angela Kelly	SD-C401-CDP25-350 – Liam Byrne	SD-C401-CDP25-351 – Aoife Byrne
SD-C401-CDP25-352 – Derek Byrne	SD-C401-CDP25-353 – Carl Humphreys	SD-C401-CDP25-354 – Carmel Byrne
SD-C401-CDP25-355 – Jason Kavanagh	SD-C401-CDP25-356 – Susan Kavanagh	SD-C401-CDP25-357 – Rose Aherne
SD-C401-CDP25-358 – Katie Hynes	SD-C401-CDP25-359 – Shane Nestor	SD-C401-CDP25-360 – Noel Crowley
SD-C401-CDP25-361 – Alan Slaughter	SD-C401-CDP25-362 – Barry Deegan	SD-C401-CDP25-363 – Owen O Brien
SD-C401-CDP25-364 – Stephen Mason	SD-C401-CDP25-365 – Syed Ibrahim Shahul Hameed	SD-C401-CDP25-366 – Divya Manhas
SD-C401-CDP25-367 – Private citizen	SD-C401-CDP25-368 – Orla Flanagan	SD-C401-CDP25-369 – Darrell Carey
SD-C401-CDP25-370 – Walter Bermingham	SD-C401-CDP25-371 – Emilia Drzewiecka	SD-C401-CDP25-372 – Kayleigh Fox
SD-C401-CDP25-373 – Anne Hayes	SD-C401-CDP25-374 – Antoinette Fox	SD-C401-CDP25-375 – Sylvia Linehan
SD-C401-CDP25-376 – Jean Keogh	SD-C401-CDP25-377 – Mirela Iulia Zalaru	SD-C401-CDP25-378 – Joseph Fox
SD-C401-CDP25-379 – Ruby Devlin	SD-C401-CDP25-380 – Newcastle Community Council	SD-C401-CDP25-381 – Valerie O'Neill
SD-C401-CDP25-382 – Brian O'Neill	SD-C401-CDP25-383 – Elena Boitan	SD-C401-CDP25-384 – Miriam Cuesta Moratinos

SD-C401-CDP25-385 – Mary Maloney	SD-C401-CDP25-386 – Justyna Zajakala	SD-C401-CDP25-387 – Philip Kavanagh
SD-C401-CDP25-388 – Robert Maloney	SD-C401-CDP25-389 – Krystal Sweedman	SD-C401-CDP25-390 – Emer Maloney
SD-C401-CDP25-391 – Pat Lennon	SD-C401-CDP25-392 – Kieran Kissane	SD-C401-CDP25-393 – Aisling Lennon
SD-C401-CDP25-394 – Stephen Moffitt	SD-C401-CDP25-395 – Fiona Wolfe	SD-C401-CDP25-396 – cathy harrison
SD-C401-CDP25-397 – Brendan Lennon	SD-C401-CDP25-398 – Terry Abbott	SD-C401-CDP25-399 – Joan Stokes
SD-C401-CDP25-400 – Majella Bond	SD-C401-CDP25-401 – Denis Cronin	SD-C401-CDP25-402 – Magdalena Zajac
SD-C401-CDP25-403 – Thomas Harte	SD-C401-CDP25-404 – Tiernan Connolly	SD-C401-CDP25-405 – David Mescall
SD-C401-CDP25-406 – Joe Whyte	SD-C401-CDP25-407 – Bryan Murphy	SD-C401-CDP25-408 – Ali Nezam
SD-C401-CDP25-409 – TONY FEENEY	SD-C401-CDP25-410 – Joanna Pietka	SD-C401-CDP25-411 – Brian Kirwan
SD-C401-CDP25-412 – Colette McParland	SD-C401-CDP25-413 – Vivek Soni	SD-C401-CDP25-414 – niall oneill
SD-C401-CDP25-415 – Kevin Nolan	SD-C401-CDP25-416 – Barbara O'KEEFFE	SD-C401-CDP25-417 – Aaron Elliott
SD-C401-CDP25-418 – Michael Delany	SD-C401-CDP25-419 – Allison Davis	SD-C401-CDP25-420 – Barbara Sharkey

SD-C401-CDP25-421 – Soyel Alam	SD-C401-CDP25-422 – Soyel Alam	SD-C401-CDP25-423 – Sagar Raturi
SD-C401-CDP25-424 – Barry Aherne	SD-C401-CDP25-425 – Claire Keogh	SD-C401-CDP25-426 – Aidan Brennan
SD-C401-CDP25-427 – John Murray	SD-C401-CDP25-428 – Bernadette Boylan	SD-C401-CDP25-429 – Stuart Campbell
SD-C401-CDP25-430 – Katie McCourt	SD-C401-CDP25-431 – Lorna Quinn	SD-C401-CDP25-432 – Aishling Fagan
SD-C401-CDP25-433 – Joe O'Rourke	SD-C401-CDP25-434 – Katarzyna Czarzasta	SD-C401-CDP25-435 – Javaid Butt
SD-C401-CDP25-436 – Glenn Tubbert	SD-C401-CDP25-437 – Carmel Dwan	SD-C401-CDP25-438 – Sean Geraty
SD-C401-CDP25-439 – Fabio Cinelli	SD-C401-CDP25-440 – Lisa Lowry	SD-C401-CDP25-441 – Joanne Larkin
SD-C401-CDP25-442 – Haneet Bansal	SD-C401-CDP25-443 – Three	SD-C401-CDP25-444 – Timea Tokai
SD-C401-CDP25-445 – Karen Muir	SD-C401-CDP25-446 – Fiachra Brennan	SD-C401-CDP25-447 – Rita Jenkins
SD-C401-CDP25-448 – Seun Ogunkunle	SD-C401-CDP25-449 – Nicola Hynes	SD-C401-CDP25-450 – Adrienne Doherty
SD-C401-CDP25-451 – ken hawkins	SD-C401-CDP25-452 – Sarah Argue	SD-C401-CDP25-453 – Mary Argue
SD-C401-CDP25-454 – Carol Gallagher	SD-C401-CDP25-455 – Elizabeth O'Reilly	SD-C401-CDP25-456 – Thomas O'Reilly

SD-C401-CDP25-457 – Tracey Gallagher	SD-C401-CDP25-458 – Josephine Lawless	SD-C401-CDP25-459 – Aderrig
SD-C401-CDP25-460 – Evans Kipchaui	SD-C401-CDP25-461 – Marian Carroll	SD-C401-CDP25-462 – Ciara Dardis
SD-C401-CDP25-463 – Alan Tolan	SD-C401-CDP25-464 – Sarah Barragry	SD-C401-CDP25-465 – Magdalena Zajac
SD-C401-CDP25-466 – Stephen Harbron	SD-C401-CDP25-467 – Kelly Hogan	SD-C401-CDP25-468 – Dan Matei
SD-C401-CDP25-469 – Patricia Graham	SD-C401-CDP25-470 – Kelly Hogan	SD-C401-CDP25-471 – Rafael Madrid
SD-C401-CDP25-472 – Phyllis McNamara	SD-C401-CDP25-473 – Ruth Laverty	SD-C401-CDP25-474 – Una Howley
SD-C401-CDP25-475 – Karthick Thimma	SD-C401-CDP25-476 – Emily Wykes	SD-C401-CDP25-477 – Joe Mahon
SD-C401-CDP25-478 – Paul Donnelly	SD-C401-CDP25-479 – Martin Dunne	SD-C401-CDP25-480 – Joy Hearn
SD-C401-CDP25-481 – Trevor Morrow	SD-C401-CDP25-482 – Maciej Zajakala	SD-C401-CDP25-483 – Enda Haughey
SD-C401-CDP25-484 – Lucian Irimie	SD-C401-CDP25-485 – colin hickey	SD-C401-CDP25-486 – Thomas Mansfield
SD-C401-CDP25-487 – Steve Toner	SD-C401-CDP25-488 – Claire Lako	SD-C401-CDP25-489 – Seonaidh Ryan
SD-C401-CDP25-490 – Edmund Harman Edmund Harman	SD-C401-CDP25-491 – Arpit Jain	SD-C401-CDP25-492 – Barbara Kenna

SD-C401-CDP25-493 – Liam Morgan	SD-C401-CDP25-494 – Karolina Kajak Pienkowska	SD-C401-CDP25-495 – Ina Mikeliunaite
SD-C401-CDP25-496 – Roger Cromer	SD-C401-CDP25-497 – Nina Payanina	SD-C401-CDP25-498 – Deirdre Watters
SD-C401-CDP25-499 – Fiona Dwyer	SD-C401-CDP25-500 – Stewart Dwyer	SD-C401-CDP25-501 – Pat O Dwyer
SD-C401-CDP25-502 – Bláthnaid O'Dwyer	SD-C401-CDP25-503 – Anastazja Staszak	SD-C401-CDP25-504 – Fiona Rigney
SD-C401-CDP25-505 – Jeannette Manifold	SD-C401-CDP25-506 – Neal Murphy	SD-C401-CDP25-507 – Paul Sharkey
SD-C401-CDP25-508 – Roisin Quinn	SD-C401-CDP25-509 – Niamh Doyle	SD-C401-CDP25-510 – Siobhan Jones
SD-C401-CDP25-511 – Sarah Clery	SD-C401-CDP25-512 – John Sheehan	SD-C401-CDP25-513 – Pam Peard
SD-C401-CDP25-514 – Fearghal Bracken	SD-C401-CDP25-515 – Justin Kilduff	SD-C401-CDP25-516 – Carmel O'Keeffe
SD-C401-CDP25-517 – kathy Maher	SD-C401-CDP25-518 – Michael Cody	SD-C401-CDP25-519 – Kotryna Kurseviciute
SD-C401-CDP25-520 – Simon Hand	SD-C401-CDP25-521 – Cait Cunningham	SD-C401-CDP25-522 – Paul Gleeson
SD-C401-CDP25-523 – Deirdre O'Shea Deirdre O'Shea	SD-C401-CDP25-524 – James collins	SD-C401-CDP25-525 – Aisling Ainscough
SD-C401-CDP25-526 – Roy Lynch	SD-C401-CDP25-527 – Gordon Dowling	SD-C401-CDP25-528 – Natasha Bartlett

SD-C401-CDP25-529 – Marie Flanagan	SD-C401-CDP25-530 – Micheál Boland	SD-C401-CDP25-531 – Stephen Lydon
SD-C401-CDP25-532 – P Sharkey	SD-C401-CDP25-533 – Darren Kennedy	SD-C401-CDP25-534 – Julie Keane
SD-C401-CDP25-535 – Claire Purcell	SD-C401-CDP25-536 – emilian dackiewicz	SD-C401-CDP25-537 – emilian dackiewicz
SD-C401-CDP25-538 – emilian dackiewicz	SD-C401-CDP25-539 – emilian dackiewicz	SD-C401-CDP25-540 – Karen Roberts Roberts
SD-C401-CDP25-541 – Owen McCabe	SD-C401-CDP25-542 – Claire Heffernan	SD-C401-CDP25-543 – Ciaran Byrne
SD-C401-CDP25-544 – Felipe Bassoli	SD-C401-CDP25-545 – Mairead McMahon	SD-C401-CDP25-546 – Mirjana Kutijevac
SD-C401-CDP25-547 – Mirjana Kutijevac	SD-C401-CDP25-548 – Ken Finn	SD-C401-CDP25-549 – Mirela Iulia Zalaru
SD-C401-CDP25-550 – sakshi jain	SD-C401-CDP25-551 – xavier torne	SD-C401-CDP25-552 – Ruth Meehan
SD-C401-CDP25-553 – Saagar Vashisht	SD-C401-CDP25-554 – Karishma Patel	SD-C401-CDP25-555 – Jennifer Swinburne
SD-C401-CDP25-556 – Elzbieta Musial	SD-C401-CDP25-557 – Derek McGlynn	SD-C401-CDP25-558 – Kevin Fitzgerald
SD-C401-CDP25-559 – Daniel O'Rourke	SD-C401-CDP25-560 – Siobhan Hennessy	SD-C401-CDP25-561 – Frank Hynes

SD-C401-CDP25-562 – Paula Addison	SD-C401-CDP25-563 – Neasa O'Rourke	SD-C401-CDP25-564 – JOAN FINLAN
SD-C401-CDP25-565 – Laura Woods	SD-C401-CDP25-566 – teresa brennan	SD-C401-CDP25-567 – Gena Mc Cafferty
SD-C401-CDP25-568 – David Carroll	SD-C401-CDP25-569 – Ian O'Leary	SD-C401-CDP25-570 – Praveen Balla
SD-C401-CDP25-571 – Murali Krishna Tummala	SD-C401-CDP25-572 – Eilish O'Gorman	SD-C401-CDP25-573 – Erica Gallagher
SD-C401-CDP25-574 – Edmondstown Golf Club	SD-C401-CDP25-575 – Adrian Kopec	SD-C401-CDP25-576 – Magda Ghanim
SD-C401-CDP25-577 – Dr. Charlotte C Pilla Power	SD-C401-CDP25-578 – John O'Connor	SD-C401-CDP25-579 – Stuart Colohan
SD-C401-CDP25-580 – Ronan Conroy	SD-C401-CDP25-581 – Mark Peard	SD-C401-CDP25-582 – Barry Hughes
SD-C401-CDP25-583 – Kieran Fitzgerald	SD-C401-CDP25-584 – Amit Sharma	SD-C401-CDP25-585 – Finnian Ward
SD-C401-CDP25-586 – Mark Moran	SD-C401-CDP25-587 – Gillian Sullivan	SD-C401-CDP25-588 – Ali Madras
SD-C401-CDP25-589 – Paul O'Rourke	SD-C401-CDP25-590 – Raymond blairsdale	SD-C401-CDP25-591 – Gerry McAndrew
SD-C401-CDP25-592 – Malgorzata Kennedy	SD-C401-CDP25-593 – Newlands Golf Club	SD-C401-CDP25-594 – Rupert Fuller
SD-C401-CDP25-595 – Mairead Foyle	SD-C401-CDP25-596 – The Maritime	SD-C401-CDP25-597 – Julie Edwards

	Area Regulatory Authority (MARA)	
SD-C401-CDP25-598 – Darren Kenny	*SD-C401-CDP25-599 – Ann Somers*	*SD-C401-CDP25-600 – Valeria Luciane Okano Halila*
SD-C401-CDP25-601 – Hayley McLoughlin	*SD-C401-CDP25-602 – Seán Morrissey*	*SD-C401-CDP25-603 – Loe Antonio de Souza Lobo*
SD-C401-CDP25-604 – Steve Walsh	*SD-C401-CDP25-605 – Bhupender Jeet Singh*	*SD-C401-CDP25-606 – Mark Gannon*
SD-C401-CDP25-607 – Fix-Assist Limited	*SD-C401-CDP25-608 – Niall Carroll*	*SD-C401-CDP25-609 – Niamh Power*
SD-C401-CDP25-610 – Martin Boland	*SD-C401-CDP25-611 – Niamh Power*	*SD-C401-CDP25-612 – Niamh Power*
SD-C401-CDP25-613 – Liam Bartley	*SD-C401-CDP25-614 – Niamh Power*	*SD-C401-CDP25-615 – Niamh Power*
SD-C401-CDP25-616 – Denise Carroll	*SD-C401-CDP25-617 – Trevor Phelan*	*SD-C401-CDP25-618 – Julie Edwards*
SD-C401-CDP25-619 – Dermot Finch	*SD-C401-CDP25-620 – Shane Mc Garry*	*SD-C401-CDP25-621 – Bryan Long*
SD-C401-CDP25-622 – FORAN AISLING AISLING	*SD-C401-CDP25-623 – Sarah Regan*	*SD-C401-CDP25-624 – Paul Dunphy*
SD-C401-CDP25-625 – Kevin Murtagh	*SD-C401-CDP25-626 – Brigetta Connolly*	*SD-C401-CDP25-627 – Siobhan Casey*

SD-C401-CDP25-628 – Emma Murphy	*SD-C401-CDP25-629 – Sarah Von Steiger*	*SD-C401-CDP25-630 – Elizabeth Quinn*
SD-C401-CDP25-631 – Ruairi Quinn	*SD-C401-CDP25-632 – Joseph Gavin*	*SD-C401-CDP25-633 – Eoin Lanigan*
SD-C401-CDP25-634 – Sean and Catherine Giblin	*SD-C401-CDP25-635 – Ruairi Quinn*	*SD-C401-CDP25-636 – Alison golding*
SD-C401-CDP25-637 – Elizabeth Quinn	*SD-C401-CDP25-638 – Seán Dungan*	*SD-C401-CDP25-639 – Strawberry Beds Residents Association*
SD-C401-CDP25-640 – Amy Kane	*SD-C401-CDP25-641 – Miriam Gavin*	*SD-C401-CDP25-642 – Sinéad Mcintyre*
SD-C401-CDP25-643 – Niamh Dungan	*SD-C401-CDP25-644 – Grace Carey*	*SD-C401-CDP25-645 – David Dungan*
SD-C401-CDP25-646 – Lorraine Finn	*SD-C401-CDP25-647 – Mairead Barrett*	*SD-C401-CDP25-648 – Diane Grogan*
SD-C401-CDP25-649 – Westbury Court Residents Association	*SD-C401-CDP25-650 – Mark Rice*	*SD-C401-CDP25-651 – Teresa Moyles*
SD-C401-CDP25-652 – Catherine ross	*SD-C401-CDP25-653 – Sarah Ann Mulqueen*	*SD-C401-CDP25-654 – Sean Foley*
SD-C401-CDP25-655 – Rosemary Fair	*SD-C401-CDP25-656 – Nora Neville*	*SD-C401-CDP25-657 – Tom Phillips + Associates*
SD-C401-CDP25-658 – Fergus Dunne	*SD-C401-CDP25-659 – Sean Dowling*	*SD-C401-CDP25-660 – Paddy Mulhern*

SD-C401-CDP25-661 – Geraldine Walsh	SD-C401-CDP25-662 – Kieran Hallinan Hallinan	SD-C401-CDP25-663 – Deirdre Dowling
SD-C401-CDP25-664 – Flood Crowley Partnership	SD-C401-CDP25-665 – Joe Murphy	SD-C401-CDP25-666 – Linda Ffrench
SD-C401-CDP25-667 – Sanijan Mathew	SD-C401-CDP25-668 – CORMAC MC CARTHY	SD-C401-CDP25-669 – CORMAC MC CARTHY
SD-C401-CDP25-670 – Ross Boxshall	SD-C401-CDP25-671 – Conor Doyle	SD-C401-CDP25-672 – Peter Anderson
SD-C401-CDP25-673 – Sinead Donnelly	SD-C401-CDP25-674 – Sinead Donnelly	SD-C401-CDP25-675 – Emma Conway
SD-C401-CDP25-676 – jean lawlor	SD-C401-CDP25-677 – Catherine Sullivan	SD-C401-CDP25-678 – Brendan Sweeney
SD-C401-CDP25-679 – Joanne O'Flynn	SD-C401-CDP25-680 – Anthony Nolan	SD-C401-CDP25-681 – Suzanne Doyle
SD-C401-CDP25-682 – Catherine Dardis	SD-C401-CDP25-683 – Paul Douglas	SD-C401-CDP25-684 – Davina Monahan
SD-C401-CDP25-685 – Ronan Brannigan	SD-C401-CDP25-686 – Colm Doyle	SD-C401-CDP25-687 – Esther Monahan
SD-C401-CDP25-688 – Andrew Tully	SD-C401-CDP25-689 – Gary Hancox	SD-C401-CDP25-690 – eric neville
SD-C401-CDP25-691 – Susan Murphy	SD-C401-CDP25-692 – Roisin Quinn	SD-C401-CDP25-693 – Naomi Anderson
SD-C401-CDP25-694 – Joe Croke	SD-C401-CDP25-695 – Sharon Holland	SD-C401-CDP25-696 – Maryna Chyharova

SD-C401-CDP25-697 – Esther Kocsis	SD-C401-CDP25-698 – Garreth Brennan	SD-C401-CDP25-699 – Veronica McCallum
SD-C401-CDP25-700 – Vijaykumar Jagadeesan	SD-C401-CDP25-701 – Farry Town Planning Ltd.	SD-C401-CDP25-702 – Eileen Dennehy
SD-C401-CDP25-704 – Lucy Jordan	SD-C401-CDP25-705 – Aidan Mills	SD-C401-CDP25-706 – Mick May
SD-C401-CDP25-707 – Suzanne Harte	SD-C401-CDP25-708 – Michael Marshall	SD-C401-CDP25-709 – Lucy Stephens
SD-C401-CDP25-710 – Fiona Griffin	SD-C401-CDP25-711 – Catherine O' Donnell	SD-C401-CDP25-712 – Neil Homan
SD-C401-CDP25-713 – John O'Donnell	SD-C401-CDP25-714 – Katie Keane	SD-C401-CDP25-715 – Peter McCabe
SD-C401-CDP25-716 – Christopher Devaney	SD-C401-CDP25-717 – Emma Bermingham	SD-C401-CDP25-718 – Mary McCabe
SD-C401-CDP25-719 – Viona Sheppard	SD-C401-CDP25-720 – Sophie Dennehy	SD-C401-CDP25-721 – Philip Dennehy
SD-C401-CDP25-722 – Kristin Springer	SD-C401-CDP25-723 – Norman Carroll	SD-C401-CDP25-724 – Louise Devlin
SD-C401-CDP25-725 – Norman Carroll	SD-C401-CDP25-726 – Sara Kavanagh	SD-C401-CDP25-727 – James Anderson
SD-C401-CDP25-728 – Murray Nolan	SD-C401-CDP25-729 – Gavin Smyth	SD-C401-CDP25-730 – Riain Murphy
SD-C401-CDP25-731 – Therese Smyth	SD-C401-CDP25-732 – Ed Corkery	SD-C401-CDP25-733 – Paul Nolan

SD-C401-CDP25-734 – Sean Smyth	SD-C401-CDP25-735 – Bernie Murtagh	SD-C401-CDP25-736 – Antoinette Griffin
SD-C401-CDP25-737 – Annette McDermott McDermott	SD-C401-CDP25-738 – Sile Tavey	SD-C401-CDP25-739 – Sile Tavey
SD-C401-CDP25-740 – Ann Nealon	SD-C401-CDP25-741 – Fergus Carey	SD-C401-CDP25-742 – Fiona Murphy
SD-C401-CDP25-743 – Paula McMahon	SD-C401-CDP25-744 – Paul Crone	SD-C401-CDP25-745 – Ballydowd Residents' Association
SD-C401-CDP25-746 – John Paul Tuohy	SD-C401-CDP25-747 – Catherine Carey	SD-C401-CDP25-748 – Alan Furlong
SD-C401-CDP25-749 – Jack Henry	SD-C401-CDP25-750 – Pauline Bligh	SD-C401-CDP25-751 – Mary Anderson
SD-C401-CDP25-752 – Yvonne Melinn	SD-C401-CDP25-753 – Joseph Bligh	SD-C401-CDP25-754 – Marie McKeon
SD-C401-CDP25-755 – Fiona Lee	SD-C401-CDP25-756 – Pádraic Slavin	SD-C401-CDP25-757 – Liam Russell
SD-C401-CDP25-758 – Alice Whyte	SD-C401-CDP25-759 – Stephanie Maher	SD-C401-CDP25-760 – Howard Robinson
SD-C401-CDP25-761 – Yvonne Brannigan	SD-C401-CDP25-762 – Andrea Waide	SD-C401-CDP25-763 – Gavin Kelly
SD-C401-CDP25-764 – John Harper	SD-C401-CDP25-765 – Mairead Byrne	SD-C401-CDP25-766 – Anne Robinson
SD-C401-CDP25-767 – Helen Carbery	SD-C401-CDP25-768 – Joanne Carolan	SD-C401-CDP25-769 – Peter Murray

SD-C401-CDP25-770 – ALEKSANDR BORTNIK	SD-C401-CDP25-771 – Nicola Fitzpatrick	SD-C401-CDP25-772 – James Grogan
SD-C401-CDP25-773 – Deirdre Cooper	SD-C401-CDP25-774 – Keith Howell	SD-C401-CDP25-775 – Sandra Bredin
SD-C401-CDP25-776 – Mary Whittle	SD-C401-CDP25-777 – Little Folk Preschool	SD-C401-CDP25-778 – Heather Martin Martin
SD-C401-CDP25-779 – Stephanie Monaghan	SD-C401-CDP25-780 – Ann Grimes	SD-C401-CDP25-781 – Amy Lucey Lucey
SD-C401-CDP25-782 – G Manning	SD-C401-CDP25-783 – Sarah Owen	SD-C401-CDP25-784 – Denice Mellon Mellon
SD-C401-CDP25-785 – Susan Brophy	SD-C401-CDP25-786 – Sinead Wallace	SD-C401-CDP25-787 – Fionnuala Hogan
SD-C401-CDP25-788 – AOIFE MURPHY	SD-C401-CDP25-789 – Julieanne McGeown McGeown	SD-C401-CDP25-790 – David Hargadon
SD-C401-CDP25-791 – Evelyn O'Brien	SD-C401-CDP25-792 – Sarah Moore	SD-C401-CDP25-793 – Adam Monks
SD-C401-CDP25-794 – Adam Monks	SD-C401-CDP25-795 – DEREK CLUSKEY	SD-C401-CDP25-796 – Gilda Sisk
SD-C401-CDP25-797 – Mary C	SD-C401-CDP25-798 – Tommy Cartwright	SD-C401-CDP25-799 – Louise Monks
SD-C401-CDP25-800 – Ann Cartwright	SD-C401-CDP25-801 – DAVID HANRAHAN	SD-C401-CDP25-802 – John Fitzgerald
SD-C401-CDP25-803 – Darragh Henry	SD-C401-CDP25-804 – Vivienne Flynn	SD-C401-CDP25-805 – Ruth Argue

SD-C401-CDP25-806 – PAUL MELINN	SD-C401-CDP25-807 – Yvonne Tighe	SD-C401-CDP25-808 – Imelda Higgins
SD-C401-CDP25-809 – Cllr Trevor Gilligan PC	SD-C401-CDP25-810 – Deirdre Galvin	SD-C401-CDP25-811 – Ahson Pasha
SD-C401-CDP25-812 – Brady Shipman Martin	SD-C401-CDP25-813 – Joohi Kamath	SD-C401-CDP25-814 – Margaret Doyle
SD-C401-CDP25-815 – Lucas Pervan	SD-C401-CDP25-816 – Paul Richards	SD-C401-CDP25-817 – Faye Kinsella Kinsella
SD-C401-CDP25-818 – Niall Hickey	SD-C401-CDP25-819 – Janice Holohan Holohan	SD-C401-CDP25-820 – Richard Moriarty
SD-C401-CDP25-821 – Claire Garvey	SD-C401-CDP25-822 – Amanda Whelan	SD-C401-CDP25-823 – Laura Brophy
SD-C401-CDP25-824 – Stephen Price	SD-C401-CDP25-825 – Jennifer Merriman	SD-C401-CDP25-826 – Niamh Bell
SD-C401-CDP25-827 – Rosemary Corkery	SD-C401-CDP25-828 – Marie Keogh	SD-C401-CDP25-829 – Alan Scullion
SD-C401-CDP25-830 – Kevin Lyons	SD-C401-CDP25-831 – Teresa Cooney	SD-C401-CDP25-832 – Marie Smyth
SD-C401-CDP25-833 – alan byrne	SD-C401-CDP25-834 – A FARRELL	SD-C401-CDP25-835 – Michelle Staunton Staunton
SD-C401-CDP25-836 – Marie O'Reilly	SD-C401-CDP25-837 – Ken Goodwin	SD-C401-CDP25-838 – Ray Barnes
SD-C401-CDP25-839 – Basil Hudson	SD-C401-CDP25-840 – John Kinsella	SD-C401-CDP25-841 – David Kilgannon
SD-C401-CDP25-842 – Hans Mattisson	SD-C401-CDP25-843 – andrew duff	SD-C401-CDP25-844 – Gillian Doyle

SD-C401-CDP25-845 – Gaurav Agrawal	SD-C401-CDP25-846 – Lynn Redmond Redmond	SD-C401-CDP25-847 – Grace Lavery O'Reilly
SD-C401-CDP25-848 – Eithne Richardson	SD-C401-CDP25-849 – Adrienne Sullivan	SD-C401-CDP25-850 – Carleen Stringer
SD-C401-CDP25-851 – Derek Joyce	SD-C401-CDP25-852 – Danielle Devesey	SD-C401-CDP25-853 – Patrick Healy
SD-C401-CDP25-854 – Vee Dee	SD-C401-CDP25-855 – Vincent Casserly	SD-C401-CDP25-856 – Kevin Kelly
SD-C401-CDP25-857 – Iain Briscoe	SD-C401-CDP25-858 – Juliet Henshaw	SD-C401-CDP25-859 – Finnian Ward
SD-C401-CDP25-860 – Roisin O'Shea	SD-C401-CDP25-861 – Virginia Dooley	SD-C401-CDP25-862 – Adrienne McGee
SD-C401-CDP25-863 – Liffey Salmon Project	SD-C401-CDP25-864 – Alan Breen	SD-C401-CDP25-865 – Adrian Thompson
SD-C401-CDP25-866 – Tom Sweeney Sweeney	SD-C401-CDP25-867 – Patrick O'BRIEN	SD-C401-CDP25-868 – RITA CROKE
SD-C401-CDP25-869 – Jennifer Martin	SD-C401-CDP25-870 – Maria McKiernan	SD-C401-CDP25-871 – Laura Lawlor
SD-C401-CDP25-872 – SCA Planning	SD-C401-CDP25-873 – Patrick O'BRIEN	SD-C401-CDP25-874 – EUGENE BARRETT
SD-C401-CDP25-875 – JOHN BURKE	SD-C401-CDP25-876 – Eve Doyle	SD-C401-CDP25-877 – Irish Water
SD-C401-CDP25-878 – Paul&Linda McKenna	SD-C401-CDP25-879 – Gemma Collins	SD-C401-CDP25-880 – Brian Dooley

SD-C401-CDP25-881 – Susan Daly	SD-C401-CDP25-882 – Cormac O'Brien	SD-C401-CDP25-883 – Eoin McDonagh
SD-C401-CDP25-884 – Dermot Keogh	SD-C401-CDP25-885 – Julija Labutiene	SD-C401-CDP25-886 – Jody Phillips
SD-C401-CDP25-887 – Nina Healy	SD-C401-CDP25-888 – Patricia Farrell	SD-C401-CDP25-889 – Alison Fogarty
SD-C401-CDP25-890 – Anne Maher	SD-C401-CDP25-891 – Ann Hynes	SD-C401-CDP25-892 – Sharon Murray
SD-C401-CDP25-893 – Fiona Young	SD-C401-CDP25-894 – Kevin Maher	SD-C401-CDP25-895 – Heather Hallinan
SD-C401-CDP25-896 – David Young	SD-C401-CDP25-897 – Mark Lester	SD-C401-CDP25-898 – Declan. Costello
SD-C401-CDP25-899 – Fiona Balfe	SD-C401-CDP25-900 – Mary J Nolan	SD-C401-CDP25-901 – Carol Lester
SD-C401-CDP25-902 – Megan McMenamin	SD-C401-CDP25-903 – Anne Marie Brady	SD-C401-CDP25-904 – Samantha Jordan
SD-C401-CDP25-905 – Neil Coogan	SD-C401-CDP25-906 – Brendan Hanley	SD-C401-CDP25-907 – Marie O'Malley
SD-C401-CDP25-908 – Lisa O'Connor	SD-C401-CDP25-909 – Ciara Mchugh	SD-C401-CDP25-910 – Patrycja Demianiuk
SD-C401-CDP25-911 – Richard Whelan	SD-C401-CDP25-912 – glenn roche	SD-C401-CDP25-913 – Aidan Duignan
SD-C401-CDP25-914 – Denise De Luca	SD-C401-CDP25-915 – Cronan Dooley	SD-C401-CDP25-916 – Lisa Heery

SD-C401-CDP25-917 – April Kerr	SD-C401-CDP25-918 – Barbara Cox	SD-C401-CDP25-919 – Galina Gamija Gamija
SD-C401-CDP25-920 – Peter Keogh	SD-C401-CDP25-921 – Oksana Abrosimova	SD-C401-CDP25-922 – Melissa Quinn
SD-C401-CDP25-923 – Eugenia Guspi	SD-C401-CDP25-924 – Helen O'Shea	SD-C401-CDP25-925 – Anna Devereux
SD-C401-CDP25-926 – Emily Bradly	SD-C401-CDP25-927 – Citywest Community Council	SD-C401-CDP25-928 – Ruth Beasley
SD-C401-CDP25-929 – Aoife Fox	SD-C401-CDP25-930 – G Casey	SD-C401-CDP25-931 – Pat OKeeffe
SD-C401-CDP25-932 – Sarah Downes	SD-C401-CDP25-933 – Ewa Urbanska	SD-C401-CDP25-934 – Aileen Coughlan
SD-C401-CDP25-935 – Julie Kelly	SD-C401-CDP25-936 – Leon Donovan	SD-C401-CDP25-937 – Brian Carroll
SD-C401-CDP25-938 – Leon Donovan	SD-C401-CDP25-939 – Sharlene NiCinneide	SD-C401-CDP25-940 – Dhirendra kumar Rawal
SD-C401-CDP25-941 – John Finn	SD-C401-CDP25-942 – Fiachra McGrath	SD-C401-CDP25-943 – Georgia Daly
SD-C401-CDP25-944 – Michelle Kearney	SD-C401-CDP25-945 – Michelle Kearney	SD-C401-CDP25-946 – Gordon Harris
SD-C401-CDP25-947 – Darren Kennedy	SD-C401-CDP25-948 – Philippa Bourke	SD-C401-CDP25-949 – Marian Henry

SD-C401-CDP25-950 – Brian O'Brien-Olinger	SD-C401-CDP25-951 – Liz McMahon	SD-C401-CDP25-952 – Caryn Su Li Ooi
SD-C401-CDP25-953 – Mariana Calderon	SD-C401-CDP25-954 – Elaine McConnell	SD-C401-CDP25-955 – Mariana Calderon
SD-C401-CDP25-956 – Jennifer Begley	SD-C401-CDP25-957 – Sarah Byrne	SD-C401-CDP25-958 – Beata Tuohy Tuohy
SD-C401-CDP25-959 – Colette Twomey	SD-C401-CDP25-960 – Gerard Kelly Anderson	SD-C401-CDP25-961 – Cathal O'Keeffe
SD-C401-CDP25-962 – Siobhan Brannigan	SD-C401-CDP25-963 – E Savage	SD-C401-CDP25-964 – Andrea Marschall
SD-C401-CDP25-965 – Paul Carberry	SD-C401-CDP25-966 – Jill Meredith	SD-C401-CDP25-967 – Matt Lavery-O'Reilly
SD-C401-CDP25-968 – Matt Lavery-O'Reilly	SD-C401-CDP25-969 – Dermot McGreal	SD-C401-CDP25-970 – Nicola Harper
SD-C401-CDP25-971 – Claire Ryan	SD-C401-CDP25-972 – Lisa King	SD-C401-CDP25-973 – Fionnala O'Brien
SD-C401-CDP25-974 – Rebecca Maunsell	SD-C401-CDP25-975 – Stephen Little & Associates	SD-C401-CDP25-976 – Matt Lavery-O'Reilly
SD-C401-CDP25-977 – Yolande Mc Cormack	SD-C401-CDP25-978 – Grainne Henry	SD-C401-CDP25-979 – Brian Foley
SD-C401-CDP25-980 – Damien Byrne	SD-C401-CDP25-981 – Stephen O'Reilly	SD-C401-CDP25-982 – Valerie Bannon

SD-C401-CDP25-983 – Ronan Byrne	SD-C401-CDP25-984 – Garvan Ware	SD-C401-CDP25-985 – Ciaran Byrne
SD-C401-CDP25-986 – Neil Martin	SD-C401-CDP25-987 – Jessica Lakes	SD-C401-CDP25-988 – Andrew Reilly
SD-C401-CDP25-989 – Louise Brogan	SD-C401-CDP25-990 – Ciaran Byrne	SD-C401-CDP25-991 – Gemma Lakes
SD-C401-CDP25-992 – S W	SD-C401-CDP25-993 – Ciaran Byrne	SD-C401-CDP25-994 – Ciaran Byrne
SD-C401-CDP25-995 – Catherine Kearney	SD-C401-CDP25-996 – Paul O'Farrell	SD-C401-CDP25-997 – Philip & Claire Bowler
SD-C401-CDP25-998 – Anna Witkowska	SD-C401-CDP25-999 – John `Corkery	SD-C401-CDP25-1000 – Stacey McGrath
SD-C401-CDP25-1001 – Brock McClure Planning and Development Consultants	SD-C401-CDP25-1002 – Martin McHugh	SD-C401-CDP25-1003 – John Coleman
SD-C401-CDP25-1004 – Rita O'connor O'connor	SD-C401-CDP25-1005 – John Green	SD-C401-CDP25-1006 – Roisin Hayden
SD-C401-CDP25-1007 – Shauna Sheridan	SD-C401-CDP25-1008 – P Tavares	SD-C401-CDP25-1009 – Diego Viegas
SD-C401-CDP25-1010 – Hilda Staunton	SD-C401-CDP25-1011 – Colin Nicolson	SD-C401-CDP25-1012 – Aine Maher
SD-C401-CDP25-1013 – Ruzain Zainal	SD-C401-CDP25-1014 – Ken Keogh Keogh	SD-C401-CDP25-1015 – Fiona Ferguson

SD-C401-CDP25-1016 – S Oconnell	SD-C401-CDP25-1017 – Grainne Okeeffe	SD-C401-CDP25-1018 – Susan McManus
SD-C401-CDP25-1019 – Nicola Meneses	SD-C401-CDP25-1020 – Anne Connaughton	SD-C401-CDP25-1021 – Barry Kennedy
SD-C401-CDP25-1022 – Carmel Griffin	SD-C401-CDP25-1023 – Aileen Doyle	SD-C401-CDP25-1024 – John J Mc Nally
SD-C401-CDP25-1025 – Sarah Mulryan	SD-C401-CDP25-1026 – James Twomey	SD-C401-CDP25-1027 – Orla Walker
SD-C401-CDP25-1028 – Sally Sheerin	SD-C401-CDP25-1029 – Carol Dunne	SD-C401-CDP25-1030 – Catriona Montgomery
SD-C401-CDP25-1031 – Timothy Fitzgibbon	SD-C401-CDP25-1032 – Paul Fahey	SD-C401-CDP25-1033 – Andrea Fitzgibbon
SD-C401-CDP25-1034 – Aileen Ennis	SD-C401-CDP25-1035 – Yvonne Costello	SD-C401-CDP25-1036 – Lynn Barron
SD-C401-CDP25-1037 – Dillon Gill	SD-C401-CDP25-1038 – Colin Mulligan	SD-C401-CDP25-1039 – Úna Mulligan
SD-C401-CDP25-1040 – Mairead Morgan	SD-C401-CDP25-1041 – Transport Infrastructure Ireland	SD-C401-CDP25-1042 – Matt Lavery-O'Reilly
SD-C401-CDP25-1043 – Matt Lavery-O'Reilly	SD-C401-CDP25-1044 – Patricia McCabe	SD-C401-CDP25-1045 – Mark Lombard

SD-C401-CDP25-1046 – Matt Lavery-O'Reilly	SD-C401-CDP25-1047 – Claire Dorgan	SD-C401-CDP25-1048 – Matt Lavery-O'Reilly
SD-C401-CDP25-1049 – Jennifer Reilly	SD-C401-CDP25-1050 – Aileen Ennis	SD-C401-CDP25-1051 – Padraig Ryan
SD-C401-CDP25-1052 – Maria Fitzgerald	SD-C401-CDP25-1053 – Mary Davis	SD-C401-CDP25-1054 – Michelle Doyle
SD-C401-CDP25-1055 – Fiona Wallace	SD-C401-CDP25-1056 – Office of Public Works	SD-C401-CDP25-1057 – Elaine O'
SD-C401-CDP25-1058 – Ram Vellore	SD-C401-CDP25-1059 – Adithya Malolan Pathanki	SD-C401-CDP25-1060 – Louise Byrne
SD-C401-CDP25-1061 – Noreen Carolan	SD-C401-CDP25-1062 – Shankar Getty	SD-C401-CDP25-1063 – Magdalena Lemanska
SD-C401-CDP25-1064 – Mary Jenkins	SD-C401-CDP25-1065 – Patrick Gunning	SD-C401-CDP25-1066 – Stephanie O'Connor
SD-C401-CDP25-1067 – Sivaram Muthiah	SD-C401-CDP25-1068 – Karen Curley	SD-C401-CDP25-1069 – Linda Parsons
SD-C401-CDP25-1070 – Bernardo Muchata	SD-C401-CDP25-1071 – Linda Garrigan	SD-C401-CDP25-1072 – Thornton O'Connor Town Planning
SD-C401-CDP25-1073 – Tanya Corbett Corbett	SD-C401-CDP25-1074 – Sarahjane Donoghue	SD-C401-CDP25-1075 – Catriona Graham

SD-C401-CDP25-1076 – Patrick Healy	*SD-C401-CDP25-1077 – AIMEE AHERN*	*SD-C401-CDP25-1078 – Clive Dempsey*
SD-C401-CDP25-1079 – Orla Duke	*SD-C401-CDP25-1080 – Damien Conlan Damien Conlan*	*SD-C401-CDP25-1081 – Vincent O'Connor*
SD-C401-CDP25-1082 – Michelle Callanan	*SD-C401-CDP25-1083 – claire Levingstone*	*SD-C401-CDP25-1084 – Fiadhnait Obrien*
SD-C401-CDP25-1085 – Pooja Dornadhula	*SD-C401-CDP25-1086 – Jane Hogan-Spain*	*SD-C401-CDP25-1087 – claire Levingstone*
SD-C401-CDP25-1088 – Una Duke	*SD-C401-CDP25-1089 – Stephen O Reilly*	*SD-C401-CDP25-1090 – Donna Leonard*
SD-C401-CDP25-1091 – claire Levingstone	*SD-C401-CDP25-1092 – Michael Lynch*	*SD-C401-CDP25-1093 – Philip Caird*
SD-C401-CDP25-1094 – Deborah Mahon	*SD-C401-CDP25-1095 – Mary Heery*	*SD-C401-CDP25-1096 – Richard Varney*
SD-C401-CDP25-1097 – Tara O'Connell	*SD-C401-CDP25-1098 – Kellie de Lacy*	*SD-C401-CDP25-1099 – Colette Henry*
SD-C401-CDP25-1100 – Mary Louise Conroy	*SD-C401-CDP25-1101 – Rodney Cromer*	*SD-C401-CDP25-1102 – Robyn Brady*
SD-C401-CDP25-1103 – Andrew Keogh	*SD-C401-CDP25-1104 – Seán Keogh*	*SD-C401-CDP25-1105 – Louise Breivik*

SD-C401-CDP25-1106 – Kayleigh Kennedy	*SD-C401-CDP25-1107 – John Sheehan*	*SD-C401-CDP25-1108 – Katherina McGarty*
SD-C401-CDP25-1109 – Bernadette Curtis	*SD-C401-CDP25-1110 – Lucan Tidy Towns*	*SD-C401-CDP25-1111 – Ronan Duke*
SD-C401-CDP25-1112 – Ray Ashmore	*SD-C401-CDP25-1113 – Gena Mc Cafferty*	*SD-C401-CDP25-1114 – Chris ORourke*
SD-C401-CDP25-1115 – Maria O'Reilly	*SD-C401-CDP25-1116 – Nicola Kearns*	*SD-C401-CDP25-1117 – Megan Fox*
SD-C401-CDP25-1118 – Anita Cahill	*SD-C401-CDP25-1119 – Marie Eccles*	*SD-C401-CDP25-1120 – Tom Moriarty*
SD-C401-CDP25-1121 – Ruth Tormey	*SD-C401-CDP25-1122 – Mary Kilbane*	*SD-C401-CDP25-1123 – Ad Meliora Management Ltd*
SD-C401-CDP25-1124 – Christine Tuohy Hopkins	*SD-C401-CDP25-1125 – Conor Byrne*	*SD-C401-CDP25-1126 – Shane Henry*
SD-C401-CDP25-1127 – Joanne Mcloughlin	*SD-C401-CDP25-1128 – Keith Mcloughlin*	*SD-C401-CDP25-1129 – Tony Tormey*
SD-C401-CDP25-1130 – Fiona Blake	*SD-C401-CDP25-1131 – Paul Carr*	*SD-C401-CDP25-1132 – Kevin Derrig*
SD-C401-CDP25-1133 – Thomas Campos	*SD-C401-CDP25-1134 – Patricia Butler*	*SD-C401-CDP25-1135 – Frank McGowan*
SD-C401-CDP25-1136 – Peter McCallum	*SD-C401-CDP25-1137 – Mairead Mckee*	*SD-C401-CDP25-1138 – Velmathi Rajaram*

SD-C401-CDP25-1139 – Aidan Nolan	SD-C401-CDP25-1140 – Nigel Place	SD-C401-CDP25-1141 – Mary J Nolan
SD-C401-CDP25-1142 – Ian Connery	SD-C401-CDP25-1143 – John Spain Associates	SD-C401-CDP25-1144 – Michael Haynes
SD-C401-CDP25-1145 – Grainne Quinn	SD-C401-CDP25-1146 – Louise Brogan	SD-C401-CDP25-1147 – Brian Doherty
SD-C401-CDP25-1148 – Maplewood Residential	SD-C401-CDP25-1149 – Daniel Kochanski	SD-C401-CDP25-1150 – Sinead Sinéad
SD-C401-CDP25-1151 – Louise Brogan	SD-C401-CDP25-1152 – Maria Filatova	SD-C401-CDP25-1153 – Aileen Blackwell Kelly
SD-C401-CDP25-1154 – Sean O'Doherty	SD-C401-CDP25-1155 – Louise Brogan	SD-C401-CDP25-1156 – Doyle Kent Planning Partnership Ltd
SD-C401-CDP25-1157 – Miriam Fitzpatrick	SD-C401-CDP25-1158 – Rebecca Ryan	SD-C401-CDP25-1159 – David Whittle
SD-C401-CDP25-1160 – Ashleigh D'Arcy	SD-C401-CDP25-1161 – Stephen Little and Associates	SD-C401-CDP25-1162 – Jake Whelan
SD-C401-CDP25-1163 – valerie ennis	SD-C401-CDP25-1164 – Cathy Coburn	SD-C401-CDP25-1165 – Jessica Spear
SD-C401-CDP25-1166 – Kevin Hamilton	SD-C401-CDP25-1167 – Inland Fisheries Ireland	SD-C401-CDP25-1168 – Philip Murphy
SD-C401-CDP25-1169 – Tina Brady	SD-C401-CDP25-1170 – Patricia Murphy	SD-C401-CDP25-1171 – Ricardo Manaia

SD-C401-CDP25-1172 – Anthony McMahon	SD-C401-CDP25-1173 – Tina Dwyer	SD-C401-CDP25-1174 – Aine Maguire
SD-C401-CDP25-1175 – Keith Tracy	SD-C401-CDP25-1176 – AnnMarie Hendrick	SD-C401-CDP25-1177 – Karen Kent
SD-C401-CDP25-1178 – Alecia McSweeney	SD-C401-CDP25-1179 – Floriana Stomeo	SD-C401-CDP25-1180 – Aoife Bradley
SD-C401-CDP25-1181 – Alfonso Mauriño Lobatón	SD-C401-CDP25-1182 – Aodhagan Maunsell	SD-C401-CDP25-1183 – Lorraine Kennedy
SD-C401-CDP25-1184 – Louise Brogan	SD-C401-CDP25-1185 – Ann Colohan	SD-C401-CDP25-1186 – Eva Mallon
SD-C401-CDP25-1187 – Local Resident	SD-C401-CDP25-1188 – Sharon Kelly	SD-C401-CDP25-1189 – Dermot Rowe
SD-C401-CDP25-1190 – Chandrasekar Chinnathambi	SD-C401-CDP25-1191 – Deirdre O'Neill	SD-C401-CDP25-1192 – William Lavelle
SD-C401-CDP25-1193 – Priya Parameswaran	SD-C401-CDP25-1194 – Ciara Tully	SD-C401-CDP25-1195 – Angela Minto
SD-C401-CDP25-1196 – Brendan Keenan	SD-C401-CDP25-1197 – Sandra M	SD-C401-CDP25-1198 – PATRICIA HARAN
SD-C401-CDP25-1199 – Nicole Broderick	SD-C401-CDP25-1200 – Katrina Russell	SD-C401-CDP25-1201 – Christine Begg
SD-C401-CDP25-1202 – Celine Kiernan	SD-C401-CDP25-1203 – Damien Enright	SD-C401-CDP25-1204 – Phelim Seery

SD-C401-CDP25-1205 – Declan Dunne	SD-C401-CDP25-1206 – Elaine Nestor	SD-C401-CDP25-1207 – The Workers' Party
SD-C401-CDP25-1208 – Ann Dunne	SD-C401-CDP25-1209 – Martin Mulleady	SD-C401-CDP25-1210 – Louise Carthy
SD-C401-CDP25-1211 – Niall Kelly	SD-C401-CDP25-1212 – David Thomas	SD-C401-CDP25-1213 – Fiona Hegarty
SD-C401-CDP25-1214 – Andrew Dunne	SD-C401-CDP25-1215 – Tony Marnell	SD-C401-CDP25-1216 – Lorraine Daly
SD-C401-CDP25-1217 – Barry Aird	SD-C401-CDP25-1218 – Marie Kelly	SD-C401-CDP25-1219 – Denis Twohig
SD-C401-CDP25-1220 – Niall O Donnell	SD-C401-CDP25-1221 – Gary Phillips	SD-C401-CDP25-1222 – Devin Thomas
SD-C401-CDP25-1223 – Gok Raja	SD-C401-CDP25-1224 – Ashling Phillips	SD-C401-CDP25-1225 – Mary Teresa Brien
SD-C401-CDP25-1226 – Mary Nevin	SD-C401-CDP25-1227 – Patrick Carney	SD-C401-CDP25-1228 – Colm Kelly
SD-C401-CDP25-1229 – Edward Phelan	SD-C401-CDP25-1230 – Emma Stanley Wade	SD-C401-CDP25-1231 – Tom Rooney
SD-C401-CDP25-1232 – Karen Gleeson	SD-C401-CDP25-1233 – Sarah Casey	SD-C401-CDP25-1234 – Robert Anderson
SD-C401-CDP25-1235 – Jim Moore	SD-C401-CDP25-1236 – Colin Mc Kiernan	SD-C401-CDP25-1237 – Aniket Jain

SD-C401-CDP25-1238 – Jean McDonagh	*SD-C401-CDP25-1239 – Cllr. Helen Farrell*	*SD-C401-CDP25-1240 – Katherine Thomas*
SD-C401-CDP25-1241 – Derek Roche	*SD-C401-CDP25-1242 – Karen Devenney Devenney*	*SD-C401-CDP25-1243 – Eimear Flynn*
SD-C401-CDP25-1244 – Joe McDonagh	*SD-C401-CDP25-1245 – Kathleen Thomas*	*SD-C401-CDP25-1246 – Deborah kiernan*
SD-C401-CDP25-1247 – Leslie Codeghini	*SD-C401-CDP25-1248 – Mark McInerney*	*SD-C401-CDP25-1249 – Ambrose Noone*
SD-C401-CDP25-1250 – Grainne Lamon	*SD-C401-CDP25-1251 – Louise Clancy*	*SD-C401-CDP25-1252 – David O'Connor*
SD-C401-CDP25-1253 – Sara Eslami	*SD-C401-CDP25-1254 – Lynsey Dunne*	*SD-C401-CDP25-1255 – Patrick Galvin*
SD-C401-CDP25-1256 – MARIAN BEIRNE	*SD-C401-CDP25-1257 – Anne-Marie Flynn*	*SD-C401-CDP25-1258 – Alan O'Neill*
SD-C401-CDP25-1259 – Jerry Lane	*SD-C401-CDP25-1260 – David Kinsella*	*SD-C401-CDP25-1261 – Blathnaid Phelan*
SD-C401-CDP25-1262 – Pauline McCormack McCormack	*SD-C401-CDP25-1263 – Marie Doolan*	*SD-C401-CDP25-1264 – Kevin Carroll*
SD-C401-CDP25-1265 – Dolores Mcardle	*SD-C401-CDP25-1266 – Lara Phelan*	*SD-C401-CDP25-1267 – Louise C*

SD-C401-CDP25-1268 – Peter Carroll	SD-C401-CDP25-1269 – Deirdre McIntyre	SD-C401-CDP25-1270 – Marcel Notenboom
SD-C401-CDP25-1271 – Karen Kinsella	SD-C401-CDP25-1272 – Joanna Kuruc	SD-C401-CDP25-1273 – Edward Thomas
SD-C401-CDP25-1274 – Sinéad Ivory	SD-C401-CDP25-1275 – Stephen Byrne	SD-C401-CDP25-1276 – Irene Murphy
SD-C401-CDP25-1277 – Neil Harte	SD-C401-CDP25-1278 – Lauren Alexander	SD-C401-CDP25-1279 – Colette O'Sullivan
SD-C401-CDP25-1280 – Noel Mc Dermott	SD-C401-CDP25-1281 – Annmarie Quinn	SD-C401-CDP25-1282 – Martha Young
SD-C401-CDP25-1283 – Stephen Walsh	SD-C401-CDP25-1284 – John Higgins	SD-C401-CDP25-1285 – Ray Casey
SD-C401-CDP25-1286 – Gavin Lynch	SD-C401-CDP25-1287 – Sharon Ruane	SD-C401-CDP25-1288 – Mairead Lawlor
SD-C401-CDP25-1289 – Niamh MacMenamin MacMenamin	SD-C401-CDP25-1290 – Elzbieta Musial	SD-C401-CDP25-1291 – Ronan N
SD-C401-CDP25-1292 – Ann Tracey	SD-C401-CDP25-1293 – Anum Alam Khan	SD-C401-CDP25-1294 – Ali Madras
SD-C401-CDP25-1295 – Conal Cassidy	SD-C401-CDP25-1296 – Claire Joyce	SD-C401-CDP25-1297 – Audrey Smith

SD-C401-CDP25-1298 – Alan Barrett	*SD-C401-CDP25-1299 – M Colgan*	*SD-C401-CDP25-1300 – Subhendu Mohapatra*
SD-C401-CDP25-1301 – Caoimhe Ní Chonchúir	*SD-C401-CDP25-1302 – Martina Quinlan Byrne*	*SD-C401-CDP25-1303 – Amanda Sadlier*
SD-C401-CDP25-1304 – Alena Kliuchnik	*SD-C401-CDP25-1305 – Geraldine Lavin*	*SD-C401-CDP25-1306 – Aishah Mohammed*
SD-C401-CDP25-1307 – Lynn Tierney	*SD-C401-CDP25-1308 – Amanda Sadlier*	*SD-C401-CDP25-1309 – Owen Ward*
SD-C401-CDP25-1310 – John O'Leary Secretary BCM Residents Association SDCPPN-0544	*SD-C401-CDP25-1311 – Ashling McHugh*	*SD-C401-CDP25-1312 – Moya Shields*
SD-C401-CDP25-1313 – Yvonne O Sullivan	*SD-C401-CDP25-1314 – Miriam Whittle*	*SD-C401-CDP25-1315 – E.M Hurley*
SD-C401-CDP25-1316 – Jean Mc Carthy	*SD-C401-CDP25-1317 – Grace Lombard*	*SD-C401-CDP25-1318 – Bridin O' Connor*
SD-C401-CDP25-1319 – Gabriel Bruton	*SD-C401-CDP25-1320 – Ali Dunne*	*SD-C401-CDP25-1321 – Anna Leonard*
SD-C401-CDP25-1322 – Peter Thimas	*SD-C401-CDP25-1323 – Anom ymous*	*SD-C401-CDP25-1324 – Lesley Jenkins*

SD-C401-CDP25-1325 – Siobhan Nolan	*SD-C401-CDP25-1326 – Cormac Branagan*	*SD-C401-CDP25-1327 – Denis Casey*
SD-C401-CDP25-1328 – Abhijit Misra	*SD-C401-CDP25-1329 – Michelle Whelan*	*SD-C401-CDP25-1330 – Olive O'Malley*
SD-C401-CDP25-1331 – Steven Billane	*SD-C401-CDP25-1332 – Syed Ibrahim Shahul Hameed*	*SD-C401-CDP25-1333 – Dermot Kelly*
SD-C401-CDP25-1334 – Damian Jones	*SD-C401-CDP25-1335 – Darren Roddy*	*SD-C401-CDP25-1336 – Clodagh Branagan*
SD-C401-CDP25-1337 – Nicola Jones	*SD-C401-CDP25-1338 – N/a*	*SD-C401-CDP25-1339 – JAKUB SITKO*
SD-C401-CDP25-1340 – Conor Flood	*SD-C401-CDP25-1341 – Keith Davis*	*SD-C401-CDP25-1342 – Tiernan O'Brien*
SD-C401-CDP25-1343 – Ann Keenan	*SD-C401-CDP25-1344 – Simon Powell*	*SD-C401-CDP25-1345 – Aileen Walsh*
SD-C401-CDP25-1346 – Alan Dunning	*SD-C401-CDP25-1347 – Siobhan Dowling*	*SD-C401-CDP25-1348 – Mary Ward*
SD-C401-CDP25-1349 – Paul O'Sullivan	*SD-C401-CDP25-1350 – Karen McEvoy*	*SD-C401-CDP25-1351 – Ballyboden St Endas GAA Club*
SD-C401-CDP25-1352 – Caroline O'Brien	*SD-C401-CDP25-1353 – Anne Hunston*	*SD-C401-CDP25-1354 – Katie Moore*
SD-C401-CDP25-1355 – Michelle McDermott	*SD-C401-CDP25-1356 – Alan Lindsay*	*SD-C401-CDP25-1357 – Elizabeth O'Neill*

SD-C401-CDP25-1358 – Katie Moore	SD-C401-CDP25-1359 – Elizabeth Cuddy	SD-C401-CDP25-1360 – Siobhan Walsh
SD-C401-CDP25-1361 – Katie Moore	SD-C401-CDP25-1362 – Katie Moore	SD-C401-CDP25-1363 – Kiran Shah
SD-C401-CDP25-1364 – Donna Manning	SD-C401-CDP25-1365 – Hermitage Park	SD-C401-CDP25-1366 – Lilian Harris
SD-C401-CDP25-1367 – Dinesh Kumar	SD-C401-CDP25-1368 – Stephen O'Reilly	SD-C401-CDP25-1369 – Barry Murphy
SD-C401-CDP25-1370 – Linda Tapley	SD-C401-CDP25-1371 – Dilmeen Kaur	SD-C401-CDP25-1372 – Gary Mitchell
SD-C401-CDP25-1373 – Dympna Donohoe	SD-C401-CDP25-1374 – Sachin Gupta	SD-C401-CDP25-1375 – Office of the Planning Regulator
SD-C401-CDP25-1376 – Matthew Colliton	SD-C401-CDP25-1377 – Colette Shirley	SD-C401-CDP25-1378 – Kenny's of Lucan
SD-C401-CDP25-1379 – Jude O'Loughlin	SD-C401-CDP25-1380 – Aoife Slattery	SD-C401-CDP25-1381 – Mark O'Dwyer
SD-C401-CDP25-1382 – Mark Walsh	SD-C401-CDP25-1383 – Anna Murphy	SD-C401-CDP25-1384 – Grainne Slattery
SD-C401-CDP25-1385 – Dominik Musial	SD-C401-CDP25-1386 – Deirdre Cooper	SD-C401-CDP25-1387 – Sinead Fitton
SD-C401-CDP25-1388 – karen hayes	SD-C401-CDP25-1389 – Sheelagh O'Dwyer	SD-C401-CDP25-1390 – Stephen T

SD-C401-CDP25-1391 – Audrey Murray Murray Murray	SD-C401-CDP25-1392 – Nasim Mahmud	SD-C401-CDP25-1393 – Anne O Byrne
SD-C401-CDP25-1394 – Lynn Redmond Redmond	SD-C401-CDP25-1395 – Karim AL SRAG	SD-C401-CDP25-1396 – Liz Pratt
SD-C401-CDP25-1397 – Brian Fogarty	SD-C401-CDP25-1398 – Patrick Leonard	SD-C401-CDP25-1399 – Dan Collins
SD-C401-CDP25-1400 – John O Byrne	SD-C401-CDP25-1401 – Tony Burke	SD-C401-CDP25-1402 – Máire Ní Fhearraigh
SD-C401-CDP25-1403 – Deb Roy	SD-C401-CDP25-1404 – Cyclist	SD-C401-CDP25-1405 – Derek Porter
SD-C401-CDP25-1406 – Alanna Homes Limited	SD-C401-CDP25-1407 – Henry Cannon	SD-C401-CDP25-1408 – Frederic Dupont
SD-C401-CDP25-1409 – Judit Csizmadia-Gossler	SD-C401-CDP25-1410 – Evan Lombard	SD-C401-CDP25-1411 – Patricia Dwyer
SD-C401-CDP25-1412 – Elaine Collins Collins	SD-C401-CDP25-1413 – Gerry O'Connell	SD-C401-CDP25-1414 – Sharifa Sultana
SD-C401-CDP25-1415 – Neil Kelly	SD-C401-CDP25-1416 – Thomas Henry	SD-C401-CDP25-1417 – Gaurav Pradeep Taori
SD-C401-CDP25-1418 – J Phelan	SD-C401-CDP25-1419 – Stephanie O'Connor	SD-C401-CDP25-1420 – Derek Tomney

SD-C401-CDP25-1421 – Lesley Dupont	SD-C401-CDP25-1422 – Suzanne Murphy	SD-C401-CDP25-1423 – Niamh C
SD-C401-CDP25-1424 – Janet Nelson	SD-C401-CDP25-1425 – Emer Colgan	SD-C401-CDP25-1426 – Jack O'Sullivan
SD-C401-CDP25-1427 – Laura Byrne	SD-C401-CDP25-1428 – Kevin Sheehan	SD-C401-CDP25-1429 – John Bird
SD-C401-CDP25-1430 – John Spain Associates	SD-C401-CDP25-1431 – Thomas Doolan	SD-C401-CDP25-1432 – Sergio Fraile
SD-C401-CDP25-1433 – Ciara Mc Nelis	SD-C401-CDP25-1434 – Anita Kelly	SD-C401-CDP25-1435 – Department of Housing, Local Government and Heritage
SD-C401-CDP25-1436 – Frank McGowan	SD-C401-CDP25-1437 – Lee Pêgas	SD-C401-CDP25-1438 – Ganga Kodishala
SD-C401-CDP25-1439 – Susan Staunton	SD-C401-CDP25-1440 – Alan Holmes	SD-C401-CDP25-1441 – Susan Staunton
SD-C401-CDP25-1442 – Paul Gogarty TD	SD-C401-CDP25-1443 – Electricity Supply Board	SD-C401-CDP25-1444 – Veronica Lynam
SD-C401-CDP25-1445 – Mary Grant	SD-C401-CDP25-1446 – Tanmay Pande	SD-C401-CDP25-1447 – Marica Fisher
SD-C401-CDP25-1448 – Dolores Aird	SD-C401-CDP25-1449 – Marie Murphy	SD-C401-CDP25-1450 – Edina Almasi

SD-C401-CDP25-1451 – Saggart Village Residents' Association	*SD-C401-CDP25-1452 – Beldare Homes*	*SD-C401-CDP25-1453 – Frank Vaughan*
SD-C401-CDP25-1454 – Martin Kelly	*SD-C401-CDP25-1455 – Burnella Cottage Ltd*	*SD-C401-CDP25-1456 – Donal Curran*
SD-C401-CDP25-1457 – Patrick Stapleton	*SD-C401-CDP25-1458 – Ferdinand van Aesch*	*SD-C401-CDP25-1459 – Fiona Morrissey Halovanić*
SD-C401-CDP25-1460 – Patrick Stapleton	*SD-C401-CDP25-1461 – Malik Irfan*	*SD-C401-CDP25-1462 – Tessa Curran*
SD-C401-CDP25-1463 – Ger Nolan	*SD-C401-CDP25-1464 – Xiaohong Zhang*	*SD-C401-CDP25-1465 – Tom Farrell*
SD-C401-CDP25-1466 – Ariane Hannon	*SD-C401-CDP25-1467 – P. Goode*	*SD-C401-CDP25-1468 – Olivier Mantoulan*
SD-C401-CDP25-1469 – Mary Lawless	*SD-C401-CDP25-1470 – Achal Desai*	*SD-C401-CDP25-1471 – Dorota Wasielewska*
SD-C401-CDP25-1472 – Dileswar Patra	*SD-C401-CDP25-1473 – Sandra Malone Malone*	*SD-C401-CDP25-1474 – SLR Consulting Ireland*
SD-C401-CDP25-1475 – Patrick Brodie	*SD-C401-CDP25-1476 – Liz Stapleton*	*SD-C401-CDP25-1477 – Liam Aird*
SD-C401-CDP25-1478 – Bibin Madhu	*SD-C401-CDP25-1479 – Hugh McGreevy & Sons (c/o Tom Phillips + Associates)*	*SD-C401-CDP25-1480 – Rathcoole Tidy Towns*

SD-C401-CDP25-1481 – Senan Farrell	SD-C401-CDP25-1482 – Aidan Walsh	SD-C401-CDP25-1483 – Niall Fagan
SD-C401-CDP25-1484 – Elizabeth Nolan	SD-C401-CDP25-1485 – Jeremy Leonard	SD-C401-CDP25-1486 – ZAHRA SIDDIQA
SD-C401-CDP25-1487 – John Spain Associates	SD-C401-CDP25-1488 – Armstrong Fenton Ltd	SD-C401-CDP25-1489 – Laragh Warfield Warfield
SD-C401-CDP25-1490 – Matthew P O Donovan Snr	SD-C401-CDP25-1491 – Cavan Developments	SD-C401-CDP25-1492 – Stephen McCarville
SD-C401-CDP25-1493 – Armstrong Fenton Ltd	SD-C401-CDP25-1494 – Jeanette Glynn	SD-C401-CDP25-1495 – Darren Nolan
SD-C401-CDP25-1496 – Aisling Quinn	SD-C401-CDP25-1497 – Sarah Galvin	SD-C401-CDP25-1498 – sailesh kumar
SD-C401-CDP25-1499 – Dorothy Timmons	SD-C401-CDP25-1500 – B. C.	SD-C401-CDP25-1501 – Tracy Armstrong
SD-C401-CDP25-1502 – daa	SD-C401-CDP25-1503 – Margaret Keane	SD-C401-CDP25-1504 – Dee Regan
SD-C401-CDP25-1505 – Ahmed Assem	SD-C401-CDP25-1506 – Caoimhe Farrell	SD-C401-CDP25-1507 – Karina ODonnell
SD-C401-CDP25-1508 – Katarzyna Szpinder	SD-C401-CDP25-1509 – Elaine McGillicuddy	SD-C401-CDP25-1510 – Sally Darlington
SD-C401-CDP25-1511 – Aishah Mohammed	SD-C401-CDP25-1512 – Julie McMullan	SD-C401-CDP25-1513 – National Transport Authority

SD-C401-CDP25-1514 – Aydin Ulas	SD-C401-CDP25-1515 – Cidem Karanfil	SD-C401-CDP25-1516 – David Henry
SD-C401-CDP25-1517 – Vijay Gill	SD-C401-CDP25-1518 – Selena Byrne	SD-C401-CDP25-1519 – Zara Keane
SD-C401-CDP25-1520 – Basmah Aziz	SD-C401-CDP25-1521 – Paula Galvin	SD-C401-CDP25-1522 – Aleksandra Dolhy
SD-C401-CDP25-1523 – Kevin Farrell	SD-C401-CDP25-1524 – DEREK WHYTE	SD-C401-CDP25-1525 – Gary Connolly
SD-C401-CDP25-1526 – Michael Coghlan	SD-C401-CDP25-1527 – Donal Walsh	SD-C401-CDP25-1528 – Johanne Monahan
SD-C401-CDP25-1529 – Santosh Nair	SD-C401-CDP25-1530 – Caoimhe Foy	SD-C401-CDP25-1531 – John Lahart TD
SD-C401-CDP25-1532 – John Gobbett	SD-C401-CDP25-1533 – Saggart Guardians	SD-C401-CDP25-1534 – Anthony O'Grady
SD-C401-CDP25-1535 – Elaine Chapman	SD-C401-CDP25-1536 – Paul Scally	SD-C401-CDP25-1537 – Sandra Coleman
SD-C401-CDP25-1538 – Rodel Rodriguez	SD-C401-CDP25-1539 – Stephen Little and Associates	SD-C401-CDP25-1540 – Brid Fahey
SD-C401-CDP25-1541 – Maciej Szpinder	SD-C401-CDP25-1542 – Sean Ward	SD-C401-CDP25-1543 – Rosaleen Murphy
SD-C401-CDP25-1544 – Eddy Byrne	SD-C401-CDP25-1545 – Fiona Hyland	SD-C401-CDP25-1546 – Roy O'Rourke

SD-C401-CDP25-1547 – Claire Gallagher	*SD-C401-CDP25-1548 – Sinéad Farrell*	*SD-C401-CDP25-1549 – David Sadlier*
SD-C401-CDP25-1550 – Cllr Linda de Courcy	*SD-C401-CDP25-1551 – DAVID CULLEN*	*SD-C401-CDP25-1552 – John Spain Associates*
SD-C401-CDP25-1553 – Cllr Linda de Courcy	*SD-C401-CDP25-1554 – Brian Sheehan*	*SD-C401-CDP25-1555 – Brian Sheehan*
SD-C401-CDP25-1556 – Georgina Moran	*SD-C401-CDP25-1557 – Iarnród Éireann / Irish Rail*	*SD-C401-CDP25-1558 – Genevieve Hennessy*
SD-C401-CDP25-1559 – Cllr Linda de Courcy	*SD-C401-CDP25-1560 – Catherine Brangan*	*SD-C401-CDP25-1561 – Der O'Rourke*
SD-C401-CDP25-1562 – Tanja Swan	*SD-C401-CDP25-1563 – Cllr Linda de Courcy*	*SD-C401-CDP25-1564 – Colleen Fay*
SD-C401-CDP25-1565 – Monika Wrobel	*SD-C401-CDP25-1566 – Lucas Swan*	*SD-C401-CDP25-1567 – Jennifer Tierney*
SD-C401-CDP25-1568 – Gary Conlon	*SD-C401-CDP25-1569 – Catherine Brangan*	*SD-C401-CDP25-1570 – Aine Kennedy*
SD-C401-CDP25-1571 – Eimear kennedy	*SD-C401-CDP25-1572 – Mark Swan*	*SD-C401-CDP25-1573 – Josna Lisbeth*
SD-C401-CDP25-1574 – Ciarán Ahern TD	*SD-C401-CDP25-1575 – Christina van Aesch*	*SD-C401-CDP25-1576 – Alexandria Swan*

SD-C401-CDP25-1577 – Victoria Creighton	*SD-C401-CDP25-1578 – Sunil Vasudeva*	*SD-C401-CDP25-1579 – Paul Fay*
SD-C401-CDP25-1580 – Edel Mooney	*SD-C401-CDP25-1581 – Bryan Kealy*	*SD-C401-CDP25-1582 – Bluett & O'Donoghue*
SD-C401-CDP25-1583 – Niamh Fitzgerald	*SD-C401-CDP25-1584 – Luke Heffernan*	*SD-C401-CDP25-1585 – KPMG Planning for Cairn Homes PLC and the Crowley family*
SD-C401-CDP25-1586 – Pallavi Deshmukh	*SD-C401-CDP25-1587 – Breda Connolly*	*SD-C401-CDP25-1588 – John Spain Associates*
SD-C401-CDP25-1589 – An Claíomh Glas & Lucan Planning Council	*SD-C401-CDP25-1590 – Siarhei Bobysh*	*SD-C401-CDP25-1591 – DEASUN O BROIN*
SD-C401-CDP25-1592 – John O'Brien	*SD-C401-CDP25-1593 – Derek Glynn*	*SD-C401-CDP25-1594 – Sara Feeney*
SD-C401-CDP25-1595 – Bridie and Eamonn Nestor	*SD-C401-CDP25-1596 – Fiona O'Brien*	*SD-C401-CDP25-1597 – Cllr Vicki Casserly*
SD-C401-CDP25-1598 – Ruby K K Sandhu	*SD-C401-CDP25-1599 – Gabriel McKeon*	*SD-C401-CDP25-1600 – Agnieszka Trzos*
SD-C401-CDP25-1601 – Kevin Horan	*SD-C401-CDP25-1602 – Suzanne Fitzpatrick*	*SD-C401-CDP25-1603 – John Devaney*
SD-C401-CDP25-1604 – Javier Romero	*SD-C401-CDP25-1605 – Eleonore McKinney*	*SD-C401-CDP25-1606 – Eamon Tuffy*

SD-C401-CDP25-1607 – Gráinne O'Leary	SD-C401-CDP25-1608 – Manami Greene	SD-C401-CDP25-1609 – Arvind Devalla
SD-C401-CDP25-1610 – John O'Connor	SD-C401-CDP25-1611 – Maria Pender	SD-C401-CDP25-1612 – Raymond Conlon
SD-C401-CDP25-1613 – Fintan Tait	SD-C401-CDP25-1614 – Liam Hendrick	SD-C401-CDP25-1615 – Elmuntasir Elhadi
SD-C401-CDP25-1616 – Caoimhe Hogarty	SD-C401-CDP25-1617 – Pearse Carberry	SD-C401-CDP25-1618 – Paddy Keating
SD-C401-CDP25-1619 – Darragh Begley	SD-C401-CDP25-1620 – Bhawna Rana	SD-C401-CDP25-1621 – Tomasz Lemanski
SD-C401-CDP25-1622 – Susan Phelan	SD-C401-CDP25-1623 – Melissa Griffin	SD-C401-CDP25-1624 – I Mc Cabe
SD-C401-CDP25-1625 – Roger Griffin	SD-C401-CDP25-1626 – Ana Campo	SD-C401-CDP25-1627 – Orla Cunningham
SD-C401-CDP25-1628 – Sharon Kirwan	SD-C401-CDP25-1629 – Dan Barjovanu	SD-C401-CDP25-1630 – Graham Healy
SD-C401-CDP25-1631 – Caroline Belton	SD-C401-CDP25-1632 – Alyssa Gilmore	SD-C401-CDP25-1633 – Grace OShea
SD-C401-CDP25-1634 – David Murphy	SD-C401-CDP25-1635 – Martina Dunne	SD-C401-CDP25-1636 – Maria Guerriero

SD-C401-CDP25-1637 – Sophia Byrne	SD-C401-CDP25-1638 – Cormac Phelan	SD-C401-CDP25-1639 – Carmel Callaghan
SD-C401-CDP25-1640 – Sinead Murphy	SD-C401-CDP25-1641 – Thomas Callaghan	SD-C401-CDP25-1642 – Brid Flood Moran
SD-C401-CDP25-1643 – Tara Ryan	SD-C401-CDP25-1644 – Rebecca Galvin	SD-C401-CDP25-1645 – Clare Hamilton
SD-C401-CDP25-1646 – Romeville Developments Ltd	SD-C401-CDP25-1647 – Stephen Dolan	SD-C401-CDP25-1648 – Nicola Maguire
SD-C401-CDP25-1649 – Frank O'Leary	SD-C401-CDP25-1650 – Geraldine Kennedy Geraldine Kennedy	SD-C401-CDP25-1651 – Catriona Wheeler
SD-C401-CDP25-1652 – Margueritte Sherry	SD-C401-CDP25-1653 – John Leonard	SD-C401-CDP25-1654 – Rick Cuyugan
SD-C401-CDP25-1655 – LIONA O'TOOLE	SD-C401-CDP25-1656 – Laura Breslin	SD-C401-CDP25-1657 – Sean Breslin
SD-C401-CDP25-1658 – Samantha Yang	SD-C401-CDP25-1659 – Declan Rooney	SD-C401-CDP25-1660 – Linda Butler
SD-C401-CDP25-1661 – Aisling Collins	SD-C401-CDP25-1662 – Vitali Baranouski	SD-C401-CDP25-1663 – Roisin Mannion
SD-C401-CDP25-1664 – Knocklyon Network	SD-C401-CDP25-1665 – Irina Roy	SD-C401-CDP25-1666 – Shane Moynihan TD

SD-C401-CDP25-1667 – Emer Gaj-McKeever	SD-C401-CDP25-1668 – Gerard Jenkins	SD-C401-CDP25-1669 – Damien Moloney
SD-C401-CDP25-1670 – Sophia Leonard	SD-C401-CDP25-1671 – Licel Codeghini	SD-C401-CDP25-1672 – Javier Ayala
SD-C401-CDP25-1673 – Ashwani Kumar	SD-C401-CDP25-1674 – Lisa Duggan	SD-C401-CDP25-1675 – Bernie Stapleton
SD-C401-CDP25-1676 – South Dublin Conservation Society	SD-C401-CDP25-1677 – Janet Carty	SD-C401-CDP25-1678 – Eoghan Nihill
SD-C401-CDP25-1679 – Mirjana Kutijevac	SD-C401-CDP25-1680 – Natalia Kublova	SD-C401-CDP25-1681 – Roopesh Harinath
SD-C401-CDP25-1682 – Michael Boyle	SD-C401-CDP25-1683 – Neha Gupta	SD-C401-CDP25-1684 – Aoife Kirwan
SD-C401-CDP25-1685 – Aoife McCarville	SD-C401-CDP25-1686 – Claire Colohan	SD-C401-CDP25-1687 – Nicola Mahoney
SD-C401-CDP25-1688 – Caroline Carney	SD-C401-CDP25-1689 – Leonard Skelly	SD-C401-CDP25-1690 – Gillian Crowe
SD-C401-CDP25-1691 – Claire Colohan	SD-C401-CDP25-1692 – Nessa Boyle	SD-C401-CDP25-1693 – Sheetal Shah
SD-C401-CDP25-1694 – Imogen Murphy	SD-C401-CDP25-1695 – Louise Quinn	SD-C401-CDP25-1696 – Lisa Donnelly
SD-C401-CDP25-1697 – Orla O Shea	SD-C401-CDP25-1698 – Fiona Lambe	SD-C401-CDP25-1699 – James White

SD-C401-CDP25-1700 – STANLEY PAUL BLESSING WILLIAM	SD-C401-CDP25-1701 – Piotr Zajac	SD-C401-CDP25-1702 – Sana Khan
SD-C401-CDP25-1703 – Eamon O'Maolchaoin	SD-C401-CDP25-1704 – Piotr Zajac	SD-C401-CDP25-1705 – Kirill Priadko
SD-C401-CDP25-1706 – Maura O'Keeffe	SD-C401-CDP25-1707 – Clare Wright	SD-C401-CDP25-1708 – Niamh Lacy
SD-C401-CDP25-1709 – Daniel McCartney	SD-C401-CDP25-1710 – Ruth Curran	SD-C401-CDP25-1711 – Robert Nelson
SD-C401-CDP25-1712 – Niall Roche	SD-C401-CDP25-1713 – Ramanathan Gowrishankar	SD-C401-CDP25-1714 – Jayaram Mani
SD-C401-CDP25-1715 – Maria Murphy	SD-C401-CDP25-1716 – Hazel Dowling Shannon	SD-C401-CDP25-1717 – Jonathan Roach
SD-C401-CDP25-1718 – Shaila Prabhu	SD-C401-CDP25-1719 – Amit Sharma	SD-C401-CDP25-1720 – Cathy Medbury
SD-C401-CDP25-1721 – Caroline Lawlor	SD-C401-CDP25-1722 – Patricia Mac Manus	SD-C401-CDP25-1723 – Ranjana Sharma
SD-C401-CDP25-1724 – MICHAEL MC GRATH	SD-C401-CDP25-1725 – Department of Education and Youth	SD-C401-CDP25-1726 – Elizabeth Chacko
SD-C401-CDP25-1727 – Ajai Govind Govindan	SD-C401-CDP25-1728 – Divya Melvin Puthumana	SD-C401-CDP25-1729 – Jennifer Williams

SD-C401-CDP25-1730 – Ratna Paladugu	SD-C401-CDP25-1731 – CLAIRE MURPHY	SD-C401-CDP25-1732 – Aarsh Shah
SD-C401-CDP25-1733 – Golda Thomas	SD-C401-CDP25-1734 – Matthew Roberts	SD-C401-CDP25-1735 – Hannah Murphy
SD-C401-CDP25-1736 – UnniKrishnan Erukattil	SD-C401-CDP25-1737 – John Bird	SD-C401-CDP25-1738 – Aislinn Shaw
SD-C401-CDP25-1739 – H Smyth	SD-C401-CDP25-1740 – Ajin Nair	SD-C401-CDP25-1741 – Ben Healy
SD-C401-CDP25-1742 – Renjana Mathew	SD-C401-CDP25-1743 – Zainab Javaid	SD-C401-CDP25-1744 – Anthony Williams
SD-C401-CDP25-1745 – Sarah Murphy	SD-C401-CDP25-1746 – Ciaran OToole	SD-C401-CDP25-1747 – Ben Healy
SD-C401-CDP25-1748 – Diane Begley	SD-C401-CDP25-1749 – Julie Husman	SD-C401-CDP25-1750 – Jonathan Mooney
SD-C401-CDP25-1751 – Yanliu Ma	SD-C401-CDP25-1752 – John McGivney	SD-C401-CDP25-1753 – Ben Healy
SD-C401-CDP25-1754 – Kenneth Lavin	SD-C401-CDP25-1755 – Duane Byrne	SD-C401-CDP25-1756 – Robert OConnell
SD-C401-CDP25-1757 – Clarissa Dalton	SD-C401-CDP25-1758 – Janice O'Brien	SD-C401-CDP25-1759 – Kenneth Lavin
SD-C401-CDP25-1760 – Laura Doyle	SD-C401-CDP25-1761 – Cora Sherwood	SD-C401-CDP25-1762 – John Ryan

SD-C401-CDP25-1763 – McDonald Property	SD-C401-CDP25-1764 – Aoife Borland	SD-C401-CDP25-1765 – Kenneth Lavin
SD-C401-CDP25-1766 – Yuvraj Shah	SD-C401-CDP25-1767 – Ann-Marie Nolan	SD-C401-CDP25-1768 – Emlin Jeyakkodi
SD-C401-CDP25-1769 – Niamh Spillane	SD-C401-CDP25-1770 – Darren Stephenson	SD-C401-CDP25-1771 – Margaret Byrne
SD-C401-CDP25-1772 – Philip Curran	SD-C401-CDP25-1773 – Stephen Nugent	SD-C401-CDP25-1774 – PAUL HOULIHAN
SD-C401-CDP25-1775 – Shauna Murphy-Farrell	SD-C401-CDP25-1776 – Chris Conway	SD-C401-CDP25-1777 – Una Mullaney
SD-C401-CDP25-1778 – Peter Coakley	SD-C401-CDP25-1779 – Ballyboden Tidy Towns CLG	SD-C401-CDP25-1780 – Ellen Downes
SD-C401-CDP25-1781 – Penelope Duff	SD-C401-CDP25-1782 – Christy Byrne	SD-C401-CDP25-1783 – tONYQ O'Sullivan
SD-C401-CDP25-1784 – Marie O'Sullivan	SD-C401-CDP25-1785 – Josephine Carey	SD-C401-CDP25-1786 – Mary Rudden
SD-C401-CDP25-1787 – Anne Beales	SD-C401-CDP25-1788 – P Harding	SD-C401-CDP25-1789 – M Harding
SD-C401-CDP25-1790 – Daniel Kennedy	SD-C401-CDP25-1791 – Mark Carolan	SD-C401-CDP25-1792 – Teresa Duggan
SD-C401-CDP25-1793 – John Carolan	SD-C401-CDP25-1794 – Ann Jordan	SD-C401-CDP25-1795 – Ellie Jordan

SD-C401-CDP25-1796 – Niall Jordan	SD-C401-CDP25-1797 – Maria Stephens	SD-C401-CDP25-1798 – James O' Toole
SD-C401-CDP25-1799 – Gillian Doyle	SD-C401-CDP25-1800 – Anne Graham	SD-C401-CDP25-1801 – Eddie Longworth
SD-C401-CDP25-1802 – Kingswood Heights Residents Association NIA	SD-C401-CDP25-1803 – Fidelma McCall	SD-C401-CDP25-1804 – aNN Byrne
SD-C401-CDP25-1805 – Aoibhinn Doyle	SD-C401-CDP25-1806 – Irene Byrne	SD-C401-CDP25-1807 – Matthew Allen
SD-C401-CDP25-1808 – Aisling Morris	SD-C401-CDP25-1809 – Geraldine Doyle	SD-C401-CDP25-1810 – Deirdre Byrne
SD-C401-CDP25-1811 – Teresa Halloran	SD-C401-CDP25-1812 – Sebastian Fruend	SD-C401-CDP25-1813 – Ann Condon
SD-C401-CDP25-1814 – Mia Fulton	SD-C401-CDP25-1815 – Gleidy Santos	SD-C401-CDP25-1816 – Hannah Condon
SD-C401-CDP25-1817 – Laura Condon	SD-C401-CDP25-1818 – Catalin Briscaru	SD-C401-CDP25-1819 – Clare Downes
SD-C401-CDP25-1820 – Rhona Downes	SD-C401-CDP25-1821 – Simon Condon	SD-C401-CDP25-1822 – Amy `Callaghan
SD-C401-CDP25-1823 – Margaret O' Reilly	SD-C401-CDP25-1824 – Gabriel Davey	SD-C401-CDP25-1825 – Jennifer Delaney

SD-C401-CDP25-1826 – Ryan O' Flynn	SD-C401-CDP25-1827 – Caroline Carey	SD-C401-CDP25-1828 – Artem N/A
SD-C401-CDP25-1829 – Caroline Nevin	SD-C401-CDP25-1830 – Christophe Pataiorra	SD-C401-CDP25-1831 – Lydia Jupatova
SD-C401-CDP25-1832 – Darren O'Connor	SD-C401-CDP25-1833 – Erica Fitzpatrick	SD-C401-CDP25-1834 – Bolanle Helen
SD-C401-CDP25-1835 – Roslyn O' Ginis	SD-C401-CDP25-1836 – Amanda Carroll	SD-C401-CDP25-1837 – Anne Marie Smith
SD-C401-CDP25-1838 – Gillian O'Reilly	SD-C401-CDP25-1839 – Orla Hogan	SD-C401-CDP25-1840 – fIONA Slaughter
SD-C401-CDP25-1841 – Jack Kelly	SD-C401-CDP25-1842 – Ellen Eakins	SD-C401-CDP25-1843 – Anthony J fLYNN
SD-C401-CDP25-1844 – Isabel Solan	SD-C401-CDP25-1845 – Anne Keogh	SD-C401-CDP25-1846 – Anne O Connell
SD-C401-CDP25-1847 – Karl Keogh	SD-C401-CDP25-1848 – Jean Taylor	SD-C401-CDP25-1849 – Stephen P
SD-C401-CDP25-1850 – Caoimhin Conneely	SD-C401-CDP25-1851 – patricia Mc Donal	SD-C401-CDP25-1852 – Kathleen Mc Donald
SD-C401-CDP25-1853 – Dexter V L Hunt	SD-C401-CDP25-1854 – Rynagh Beegan	SD-C401-CDP25-1855 – Anne & Aidan Murphy
SD-C401-CDP25-1856 – Sheila Murphy	SD-C401-CDP25-1857 – Ciarán Chew	SD-C401-CDP25-1858 – Edward Chew

SD-C401-CDP25-1859 – Mel Kelvy	SD-C401-CDP25-1860 – Breda Grummey	SD-C401-CDP25-1861 – Dorene McCarthy
SD-C401-CDP25-1862 – David Henry	SD-C401-CDP25-1863 – Mary Strickland	SD-C401-CDP25-1864 – Aidan Flemming
SD-C401-CDP25-1865 – Siwead Nandlumar	SD-C401-CDP25-1866 – Nandicumar Nair	SD-C401-CDP25-1867 – Gasbrille Reidy
SD-C401-CDP25-1868 – Emma Mills	SD-C401-CDP25-1869 – Dennis McCarthy	SD-C401-CDP25-1870 – Amanda Carroll
SD-C401-CDP25-1871 – Rachel Cunningham	SD-C401-CDP25-1872 – Louise Heffernan	SD-C401-CDP25-1873 – Sean Cullen
SD-C401-CDP25-1874 – Sudway and Company Limited Chartered Surveyors	SD-C401-CDP25-1875 – Andrew Murphy	SD-C401-CDP25-1876 – Dympna Mc Hugh
SD-C401-CDP25-1877 – Róisín O Brien	SD-C401-CDP25-1878 – Caoimhe Currie	SD-C401-CDP25-1879 – Billy Mulligan
SD-C401-CDP25-1880 – Vera Sullivan	SD-C401-CDP25-1881 – Paul Williams	SD-C401-CDP25-1882 – John Slacke
SD-C401-CDP25-1883 – Patrick Culloty	SD-C401-CDP25-1884 – Oliver Ganry	SD-C401-CDP25-1885 – Katherine Donegan
SD-C401-CDP25-1886 – Marian O'Donnell Byrne	SD-C401-CDP25-1887 – Alison Kennedy	SD-C401-CDP25-1888 – Carollyn Cullen

SD-C401-CDP25-1889 – Kyna Kennedy	SD-C401-CDP25-1890 – Luke Spollen	SD-C401-CDP25-1891 – Rosalie Quinsey
SD-C401-CDP25-1892 – Avril Mc Entagert	SD-C401-CDP25-1893 – Orla Mc Cormack	SD-C401-CDP25-1894 – Ruairi Mc Entagert
SD-C401-CDP25-1895 – May O' Reilly Moore	SD-C401-CDP25-1896 – Sean Manley	SD-C401-CDP25-1897 – Anthony Sturgess
SD-C401-CDP25-1898 – Gillian Grant	SD-C401-CDP25-1899 – Bridget McEvoy	SD-C401-CDP25-1900 – Danielle Hughes
SD-C401-CDP25-1901 – Zoe Mc Entagert	SD-C401-CDP25-1902 – Vincent Smith	SD-C401-CDP25-1903 – Dermot Duggan
SD-C401-CDP25-1904 – Niall Mulhern	SD-C401-CDP25-1905 – Michael Donnelly	SD-C401-CDP25-1906 – James Mc Greevy
SD-C401-CDP25-1907 – Seán O Conghaile	SD-C401-CDP25-1908 – Nester Formentera	SD-C401-CDP25-1909 – Jason Monahan
SD-C401-CDP25-1910 – Alan Nason	SD-C401-CDP25-1911 – Cian Dwane	SD-C401-CDP25-1912 – Julie Mc Fadden
SD-C401-CDP25-1913 – Orla Mockler	SD-C401-CDP25-1914 – Lilig Chen	SD-C401-CDP25-1915 – Patricia Daly
SD-C401-CDP25-1916 – Neil Lowney	SD-C401-CDP25-1917 – Gerard Seahill	SD-C401-CDP25-1918 – Sylvia Dorigo
SD-C401-CDP25-1919 – Fintan Buckley	SD-C401-CDP25-1920 – Aileen Mills	SD-C401-CDP25-1921 – Alina Gantede

SD-C401-CDP25-1922 – Paula Smith	SD-C401-CDP25-1923 – Julie Monaghan	SD-C401-CDP25-1924 – Marie Mockler
SD-C401-CDP25-1925 – Clodagh Flynn	SD-C401-CDP25-1926 – Norbert Sellek	SD-C401-CDP25-1927 – Shane Casey
SD-C401-CDP25-1928 – Fergal Kyne	SD-C401-CDP25-1929 – Kellie De Lacy	SD-C401-CDP25-1930 – Richard Slater
SD-C401-CDP25-1931 – Darragh Kyne	SD-C401-CDP25-1932 – Matthew Murphy	SD-C401-CDP25-1933 – Antonio Jose
SD-C401-CDP25-1934 – Cara Murphy	SD-C401-CDP25-1935 – Sarah Dillon	SD-C401-CDP25-1936 – Conor Dillon
SD-C401-CDP25-1937 – Suzanne Dillon	SD-C401-CDP25-1938 – Brian Gorman	SD-C401-CDP25-1939 – Catherine Gorman
SD-C401-CDP25-1940 – Erika O' Callaghan	SD-C401-CDP25-1941 – Anthony Murphy	SD-C401-CDP25-1942 – Margaret Doyle
SD-C401-CDP25-1943 – Andrew Duffy	SD-C401-CDP25-1944 – Nuala Geraghty	SD-C401-CDP25-1945 – Carmel King
SD-C401-CDP25-1946 – Philip King	SD-C401-CDP25-1947 – Martin Doran	SD-C401-CDP25-1948 – Nuala Duffy
SD-C401-CDP25-1949 – Desmond Duffy	SD-C401-CDP25-1950 – Mary Porter	SD-C401-CDP25-1951 – Deirdre O Toole
SD-C401-CDP25-1952 – John Parkinson	SD-C401-CDP25-1953 – Jonathan Somens	SD-C401-CDP25-1954 – Kevin Zehner

SD-C401-CDP25-1955 – Yvonne Kelly	SD-C401-CDP25-1956 – Joan Slavin	SD-C401-CDP25-1957 – Raymond Cullen
SD-C401-CDP25-1958 – Billy Hayes	SD-C401-CDP25-1959 – Jonathan Kennedy	SD-C401-CDP25-1960 – Terry Abbott
SD-C401-CDP25-1961 – Andzua N/A	SD-C401-CDP25-1962 – Kevin Doherty	SD-C401-CDP25-1963 – Cathy Abbott
SD-C401-CDP25-1964 – David Porter	SD-C401-CDP25-1965 – Eric Byrne	SD-C401-CDP25-1966 – Martin Doherty
SD-C401-CDP25-1967 – Derek O Brien	SD-C401-CDP25-1968 – Ronan Shiel	SD-C401-CDP25-1969 – Tena Doherty
SD-C401-CDP25-1970 – Jeanine Byrne	SD-C401-CDP25-1971 – Mihaela Duma	SD-C401-CDP25-1972 – Aideen Mc Carthy
SD-C401-CDP25-1973 – Jeff Roche	SD-C401-CDP25-1974 – Allen Mahony	SD-C401-CDP25-1975 – Nigel Buttner
SD-C401-CDP25-1976 – Amy Curtain	SD-C401-CDP25-1977 – Elsa Cavanagh	SD-C401-CDP25-1978 – Suzanne Leyon
SD-C401-CDP25-1979 – Ann Byrne	SD-C401-CDP25-1980 – Fiona Hayden	SD-C401-CDP25-1981 – Anna Campion
SD-C401-CDP25-1982 – Matthew Killalea	SD-C401-CDP25-1983 – Anne O Toole	SD-C401-CDP25-1984 – Ceilin Bramley
SD-C401-CDP25-1985 – Anne Smith	SD-C401-CDP25-1986 – Rebecca Killalea	SD-C401-CDP25-1987 – Anthony Norton

SD-C401-CDP25-1988 – Tessa Sherlock	SD-C401-CDP25-1989 – Aoife Duffy	SD-C401-CDP25-1990 – Aoife Gorman
SD-C401-CDP25-1991 – Philip Smyth	SD-C401-CDP25-1992 – Ryan McCoy	SD-C401-CDP25-1993 – Austin Mc Cartney
SD-C401-CDP25-1994 – Ben Foxall	SD-C401-CDP25-1995 – Clodagh Hickey	SD-C401-CDP25-1996 – Ruairi Paxton
SD-C401-CDP25-1997 – Palia K	SD-C401-CDP25-1998 – Nessa Malone	SD-C401-CDP25-1999 – Rose Isip
SD-C401-CDP25-2000 – Daniusz Yozefowin	SD-C401-CDP25-2001 – Ben O Byrne	SD-C401-CDP25-2002 – Breeda Ward
SD-C401-CDP25-2003 – Janice Walsh	SD-C401-CDP25-2004 – Brian Hardagan	SD-C401-CDP25-2005 – Brian Ward
SD-C401-CDP25-2006 – Aaron Walsh	SD-C401-CDP25-2007 – Carla Ralph	SD-C401-CDP25-2008 – Caroline Peppard
SD-C401-CDP25-2009 – Cathal Gorman	SD-C401-CDP25-2010 – Louise Greene	SD-C401-CDP25-2011 – Catherine Handibode
SD-C401-CDP25-2012 – Alexandra Jozefowicz	SD-C401-CDP25-2013 – Charlotte O Neill	SD-C401-CDP25-2014 – Christina O Grady
SD-C401-CDP25-2015 – Gina Campion	SD-C401-CDP25-2016 – Cian Butler	SD-C401-CDP25-2017 – Damien Leonard
SD-C401-CDP25-2018 – Cian Duffy	SD-C401-CDP25-2019 – Grainne Henry	SD-C401-CDP25-2020 – Karen Kelly

SD-C401-CDP25-2021 – Hetman Veliia	SD-C401-CDP25-2022 – Ronan Kyne	SD-C401-CDP25-2023 – James Walker
SD-C401-CDP25-2024 – Bernie Hickey	SD-C401-CDP25-2025 – Darren Kelly	SD-C401-CDP25-2026 – Eugene Isip
SD-C401-CDP25-2027 – Lu Vicktoriia	SD-C401-CDP25-2028 – Anna Dunne	SD-C401-CDP25-2029 – TA Hickey
SD-C401-CDP25-2030 – Conor Meehan	SD-C401-CDP25-2031 – Fergus Gordon	SD-C401-CDP25-2032 – Declan Moore
SD-C401-CDP25-2033 – Anne Maria Coen	SD-C401-CDP25-2034 – Diarmuid Barron	SD-C401-CDP25-2035 – Patrick Mc Garrigle
SD-C401-CDP25-2036 – John Harrington	SD-C401-CDP25-2037 – Catherine Doherty	SD-C401-CDP25-2038 – Lorraine Walsh
SD-C401-CDP25-2039 – Eoghan Bocaer	SD-C401-CDP25-2040 – Giorgia Dorigo	SD-C401-CDP25-2041 – Tracy Denner
SD-C401-CDP25-2042 – Joan Dillon	SD-C401-CDP25-2043 – Simon Cunningham	SD-C401-CDP25-2044 – Pamela Stagg
SD-C401-CDP25-2045 – Emer Cunningham	SD-C401-CDP25-2046 – Sede Halseie	SD-C401-CDP25-2047 – Giuliano Dorigo
SD-C401-CDP25-2048 – Shane Connell	SD-C401-CDP25-2049 – James Monaghan	SD-C401-CDP25-2050 – Margaret Harrington
SD-C401-CDP25-2051 – Declan O Neill	SD-C401-CDP25-2052 – Else O Neill	SD-C401-CDP25-2053 – Frank Darcy

SD-C401-CDP25-2054 – Maura Noone	SD-C401-CDP25-2055 – Marcella Field	SD-C401-CDP25-2056 – Denis Field
SD-C401-CDP25-2057 – Alan Carroll	SD-C401-CDP25-2058 – Evan Carroll	SD-C401-CDP25-2059 – Bevnal Coy
SD-C401-CDP25-2060 – Adrian Mahon	SD-C401-CDP25-2061 – J O' Sullivan	SD-C401-CDP25-2062 – Eoin Connolly
SD-C401-CDP25-2063 – Aideen Fleming	SD-C401-CDP25-2064 – Mary Rose Martin	SD-C401-CDP25-2065 – Mairead Conery
SD-C401-CDP25-2066 – Joan Collins	SD-C401-CDP25-2067 – Helen Kyne	SD-C401-CDP25-2068 – Tommy N
SD-C401-CDP25-2069 – Aidan Leonard	SD-C401-CDP25-2070 – Frank Moore	SD-C401-CDP25-2071 – Aileen Dempsey
SD-C401-CDP25-2072 – Peter Geraty	SD-C401-CDP25-2073 – Aileen O' Donnell	SD-C401-CDP25-2074 – Maire Whelan
SD-C401-CDP25-2075 – Alan Bebbington	SD-C401-CDP25-2076 – Olive Joyce	SD-C401-CDP25-2077 – Aleena Smallwood
SD-C401-CDP25-2078 – Olive McDonagh	SD-C401-CDP25-2079 – Alex Tracey	SD-C401-CDP25-2080 – Alexander Tracey
SD-C401-CDP25-2081 – Colm McDonagh	SD-C401-CDP25-2082 – Anthony Byrne	SD-C401-CDP25-2083 – Calum Conway
SD-C401-CDP25-2084 – Ann Gordan	SD-C401-CDP25-2085 – Aidan Collen	SD-C401-CDP25-2086 – Caitriona Conway

SD-C401-CDP25-2087 – Diarmuid Conway	SD-C401-CDP25-2088 – Angela McFadden	SD-C401-CDP25-2089 – Ailish O Grady
SD-C401-CDP25-2090 – Eimear Lowry Hayes	SD-C401-CDP25-2091 – Aisling Maxwell	SD-C401-CDP25-2092 – Anne Rowley
SD-C401-CDP25-2093 – Margaret Lowry Hayes	SD-C401-CDP25-2094 – Brendan Hayes	SD-C401-CDP25-2095 – Alan Lynch
SD-C401-CDP25-2096 – Caroline Walsh	SD-C401-CDP25-2097 – Yvonne Creaven	SD-C401-CDP25-2098 – Alan Moore Mary O Reilly
SD-C401-CDP25-2099 – Catherine Henry	SD-C401-CDP25-2100 – Ciara Gallagher	SD-C401-CDP25-2101 – Ciara O Neill
SD-C401-CDP25-2102 – Adriana Varzevicius	SD-C401-CDP25-2103 – Clare Cowley	SD-C401-CDP25-2104 – Cliff Butler
SD-C401-CDP25-2105 – AlisonMark Markey	SD-C401-CDP25-2106 – Amanda Garrett	SD-C401-CDP25-2107 – Andrew McGready
SD-C401-CDP25-2108 – Cliodhna Walsh	SD-C401-CDP25-2109 – Courtney Smith	SD-C401-CDP25-2110 – Craig Duffy
SD-C401-CDP25-2111 – Daniel Heine	SD-C401-CDP25-2112 – Danny Feeney	SD-C401-CDP25-2113 – Dara Donoghue
SD-C401-CDP25-2114 – Amanda Barrett	SD-C401-CDP25-2115 – Andrew Mockler	SD-C401-CDP25-2116 – Bindu Krishnanivas

SD-C401-CDP25-2117 – Angela Jacobson	SD-C401-CDP25-2118 – Bernard Coyne Vivienne Coyne	SD-C401-CDP25-2119 – Breda Tuite
SD-C401-CDP25-2120 – Brian Crummey	SD-C401-CDP25-2121 – Marie Maher	SD-C401-CDP25-2122 – Brian Ryan
SD-C401-CDP25-2123 – Donal Horan	SD-C401-CDP25-2124 – Brigid Mc Evoy	SD-C401-CDP25-2125 – Alex D'Alba
SD-C401-CDP25-2126 – Catherine Doyle	SD-C401-CDP25-2127 – Anika Nagel	SD-C401-CDP25-2128 – B Conneely
SD-C401-CDP25-2129 – Ann Murray	SD-C401-CDP25-2130 – B Bollard	SD-C401-CDP25-2131 – A Another
SD-C401-CDP25-2132 – Geraldine Coogan	SD-C401-CDP25-2133 – Barbara Haslam	SD-C401-CDP25-2134 – Áine Kirwan
SD-C401-CDP25-2135 – Bridget Hurson	SD-C401-CDP25-2136 – Anthony Larkin	SD-C401-CDP25-2137 – Amy De Rouble
SD-C401-CDP25-2138 – Breda Kavanagh	SD-C401-CDP25-2139 – Bláthín Kelly	SD-C401-CDP25-2140 – Bernie Lancaster
SD-C401-CDP25-2141 – Afit Ahalnowalia	SD-C401-CDP25-2142 – Brendan Lally	SD-C401-CDP25-2143 – Catherine Doyle
SD-C401-CDP25-2144 – Brenda Kelly	SD-C401-CDP25-2145 – Catherine Quinn	SD-C401-CDP25-2146 – Ann Condon

SD-C401-CDP25-2147 – Cathleen Daly	SD-C401-CDP25-2148 – Christopher O Toole	SD-C401-CDP25-2149 – Ciara Caldwell
SD-C401-CDP25-2150 – Brendan Nestor	SD-C401-CDP25-2151 – Ciara Gaffney	SD-C401-CDP25-2152 – Ciara Whelan
SD-C401-CDP25-2153 – Bríd McGrath	SD-C401-CDP25-2154 – Claire Daly	SD-C401-CDP25-2155 – Clare Murphy
SD-C401-CDP25-2156 – Barry O'Hara	SD-C401-CDP25-2157 – Clive Foley	SD-C401-CDP25-2158 – Ben Pirie
SD-C401-CDP25-2159 – Breffin Worrall	SD-C401-CDP25-2160 – Bernadette Hartzenberg	SD-C401-CDP25-2161 – Bill O Kane
SD-C401-CDP25-2162 – Brendan Walsh	SD-C401-CDP25-2163 – Brian Brady	SD-C401-CDP25-2164 – Brian Doyle
SD-C401-CDP25-2165 – Catherine Blanchfield	SD-C401-CDP25-2166 – Colette Brocklebonk	SD-C401-CDP25-2167 – Carlos Carreira
SD-C401-CDP25-2168 – Chloe Cheng	SD-C401-CDP25-2169 – Charlotte Cautley	SD-C401-CDP25-2170 – Anna Cooney
SD-C401-CDP25-2171 – Ann Dillon	SD-C401-CDP25-2172 – Aoife Kennedy	SD-C401-CDP25-2173 – Antonio Sejean
SD-C401-CDP25-2174 – Audrey Gillmartin	SD-C401-CDP25-2175 – A Joyce	SD-C401-CDP25-2176 – Catherine Dunne
SD-C401-CDP25-2177 – Aaron Lamphiere	SD-C401-CDP25-2178 – Anthony Locke	SD-C401-CDP25-2179 – Cantessne Cunningham

SD-C401-CDP25-2180 – Caroline Greco	SD-C401-CDP25-2181 – Aisling Mahoney	SD-C401-CDP25-2182 – Cedru Cheng
SD-C401-CDP25-2183 – Michelle Maguire	SD-C401-CDP25-2184 – Alex Slowey	SD-C401-CDP25-2185 – Bernard Bonroy
SD-C401-CDP25-2186 – Bernadette O'Brien	SD-C401-CDP25-2187 – Carmel Bellew	SD-C401-CDP25-2188 – Emmet Bellew
SD-C401-CDP25-2189 – Emma Byrne	SD-C401-CDP25-2190 – Cathal Greene	SD-C401-CDP25-2191 – Elaine Caraway
SD-C401-CDP25-2192 – Caitríona Jones	SD-C401-CDP25-2193 – Emer Cartwright	SD-C401-CDP25-2194 – Eileen Collins
SD-C401-CDP25-2195 – Alex Tierney	SD-C401-CDP25-2196 – Claire Kineavy	SD-C401-CDP25-2197 – Ellen Fahy
SD-C401-CDP25-2198 – ÉAIBHÍN Grimes	SD-C401-CDP25-2199 – Caroline Loughnane	SD-C401-CDP25-2200 – Elizabeth Mc Cormack
SD-C401-CDP25-2201 – Ann Woods	SD-C401-CDP25-2202 – Eoin O Toole	SD-C401-CDP25-2203 – Ann Cooke
SD-C401-CDP25-2204 – Eamonn Regan	SD-C401-CDP25-2205 – Christine Tierney	SD-C401-CDP25-2206 – Eimear Reilly
SD-C401-CDP25-2207 – Ciara Massey	SD-C401-CDP25-2208 – Emma Slowey	SD-C401-CDP25-2209 – Ann Gilmore
SD-C401-CDP25-2210 – Cian McCormack	SD-C401-CDP25-2211 – Emma Thompson	SD-C401-CDP25-2212 – Diane Bailey

SD-C401-CDP25-2213 – Cillian Oakes	SD-C401-CDP25-2214 – Ann Kilduff	SD-C401-CDP25-2215 – Dara Byrne
SD-C401-CDP25-2216 – Ann Mulhern	SD-C401-CDP25-2217 – Ciara Sperin	SD-C401-CDP25-2218 – Daniel Christian
SD-C401-CDP25-2219 – Ann Tubbert	SD-C401-CDP25-2220 – Damien Doolan	SD-C401-CDP25-2221 – Deirdre Malone
SD-C401-CDP25-2222 – Darren O Brien	SD-C401-CDP25-2223 – Ann and Brian Joyce	SD-C401-CDP25-2224 – Carmel Flynn
SD-C401-CDP25-2225 – Deirdre Regan	SD-C401-CDP25-2226 – Doney Sebastian	SD-C401-CDP25-2227 – Catherine Diggins
SD-C401-CDP25-2228 – Anne Beattie	SD-C401-CDP25-2229 – Colm Elliott	SD-C401-CDP25-2230 – Anne Bolger
SD-C401-CDP25-2231 – Colm Gaffney	SD-C401-CDP25-2232 – Anne Galvin	SD-C401-CDP25-2233 – Daphne Larragy
SD-C401-CDP25-2234 – Colm O'Driscoll	SD-C401-CDP25-2235 – Darragh Gorman	SD-C401-CDP25-2236 – Conor Walsh
SD-C401-CDP25-2237 – Darren Kelly	SD-C401-CDP25-2238 – David Hargodan Stephanie Hargodan	SD-C401-CDP25-2239 – Cora Hennelly
SD-C401-CDP25-2240 – David Byrne	SD-C401-CDP25-2241 – David Mc Connell	SD-C401-CDP25-2242 – Eoghan Toolan
SD-C401-CDP25-2243 – Anne Hayes	SD-C401-CDP25-2244 – David Mc Gonagle	SD-C401-CDP25-2245 – David Norry

SD-C401-CDP25-2246 – Anne Kryger	SD-C401-CDP25-2247 – Dean Reilly	SD-C401-CDP25-2248 – Declan Curtin
SD-C401-CDP25-2249 – Declan Sherlock	SD-C401-CDP25-2250 – Dee O Byrne	SD-C401-CDP25-2251 – Anne Ryan
SD-C401-CDP25-2252 – Des O Brien	SD-C401-CDP25-2253 – Diarmuid Dawson	SD-C401-CDP25-2254 – Annemarie Gleeson
SD-C401-CDP25-2255 – Dominic Maxwell	SD-C401-CDP25-2256 – Don Dillon	SD-C401-CDP25-2257 – Donal Walshe
SD-C401-CDP25-2258 – Eileen Worrall	SD-C401-CDP25-2259 – Aoibhe Bramley	SD-C401-CDP25-2260 – Dorothea Keane
SD-C401-CDP25-2261 – Eamon Tuffy	SD-C401-CDP25-2262 – Dympna Hudson	SD-C401-CDP25-2263 – Aoibh1nn Fritton
SD-C401-CDP25-2264 – Eamon O'Brien	SD-C401-CDP25-2265 – G O Connor	SD-C401-CDP25-2266 – Gerard Bailey
SD-C401-CDP25-2267 – Gerard Bellew	SD-C401-CDP25-2268 – Edward Duffy	SD-C401-CDP25-2269 – Audrey Pierce
SD-C401-CDP25-2270 – Geraldine Fitzgerald	SD-C401-CDP25-2271 – Faye Redmond	SD-C401-CDP25-2272 – G Gorman
SD-C401-CDP25-2273 – Francis Dillan	SD-C401-CDP25-2274 – Geraldine Heaney	SD-C401-CDP25-2275 – Gillian Lacey
SD-C401-CDP25-2276 – Gillian Mc Cormack	SD-C401-CDP25-2277 – Geraldine Murphy	SD-C401-CDP25-2278 – Flavio Greco

SD-C401-CDP25-2279 – Ger Sejean	SD-C401-CDP25-2280 – Gregory Tierney	SD-C401-CDP25-2281 – Geraldine Cleary
SD-C401-CDP25-2282 – Fainche Grimes	SD-C401-CDP25-2283 – Edward Farrell	SD-C401-CDP25-2284 – Geraldine O Toole
SD-C401-CDP25-2285 – Foinnuala Kirby	SD-C401-CDP25-2286 – Edward McDonagh	SD-C401-CDP25-2287 – Geraldine Tyrrell
SD-C401-CDP25-2288 – Fiona Lee	SD-C401-CDP25-2289 – Gerard Keane	SD-C401-CDP25-2290 – Gerard Mc Loughlin
SD-C401-CDP25-2291 – Eleanor Minihan	SD-C401-CDP25-2292 – Gerard Whelan	SD-C401-CDP25-2293 – Gerard Whelan
SD-C401-CDP25-2294 – Gerry Beirne	SD-C401-CDP25-2295 – Gerry Murray	SD-C401-CDP25-2296 – Gillian Keating
SD-C401-CDP25-2297 – Gillian O Brien	SD-C401-CDP25-2298 – Gráinne Hannon	SD-C401-CDP25-2299 – Eileen Gorman
SD-C401-CDP25-2300 – Gráinne O Sullivan	SD-C401-CDP25-2301 – Eileen Lynch	SD-C401-CDP25-2302 – Eimear Carolan Jack Griffin
SD-C401-CDP25-2303 – Hannah Jordan	SD-C401-CDP25-2304 – Holly Mc Cormack	SD-C401-CDP25-2305 – Hannah Mc Stay
SD-C401-CDP25-2306 – Mary Mills	SD-C401-CDP25-2307 – Elena D'Alba	SD-C401-CDP25-2308 – Helen Stairs
SD-C401-CDP25-2309 – Elizabeth Griffin	SD-C401-CDP25-2310 – Helga Myler	SD-C401-CDP25-2311 – Henry Keogh

SD-C401-CDP25-2312 – Feidhlim Glynn	SD-C401-CDP25-2313 – Ella Dawson	SD-C401-CDP25-2314 – Ella Mulhern
SD-C401-CDP25-2315 – Fergal Hiughes	SD-C401-CDP25-2316 – Ellie Jordan	SD-C401-CDP25-2317 – Emer Crooke
SD-C401-CDP25-2318 – Emma Dillon	SD-C401-CDP25-2319 – Fionn Donoghue	SD-C401-CDP25-2320 – Emma Solan
SD-C401-CDP25-2321 – Eoin Carolan	SD-C401-CDP25-2322 – Erris Smith	SD-C401-CDP25-2323 – J Flynn
SD-C401-CDP25-2324 – Florrie Dowling	SD-C401-CDP25-2325 – Esther Beirne	SD-C401-CDP25-2326 – ethel larkin
SD-C401-CDP25-2327 – Frances Norton	SD-C401-CDP25-2328 – Inez Cooper	SD-C401-CDP25-2329 – Frank O' Reilly
SD-C401-CDP25-2330 – Eugene Heary	SD-C401-CDP25-2331 – Inga Moga	SD-C401-CDP25-2332 – Eugene O'Keeffe
SD-C401-CDP25-2333 – Evan Somers	SD-C401-CDP25-2334 – A N Other	SD-C401-CDP25-2335 – A Another
SD-C401-CDP25-2336 – John Bellew	SD-C401-CDP25-2337 – John Egan	SD-C401-CDP25-2338 – John O'Neill
SD-C401-CDP25-2339 – J Gorman	SD-C401-CDP25-2340 – Jean Kelly	SD-C401-CDP25-2341 – John Lamphion
SD-C401-CDP25-2342 – Tom Mc Cormack	SD-C401-CDP25-2343 – Jessica Ryan	SD-C401-CDP25-2344 – Julie Mc Fadden

SD-C401-CDP25-2345 – Jeananne Moriarty	SD-C401-CDP25-2346 – Julia Mulhern	SD-C401-CDP25-2347 – Joan O Donoghue
SD-C401-CDP25-2348 – John O Dwyer	SD-C401-CDP25-2349 – Jackie Kearney	SD-C401-CDP25-2350 – Jennifer Stevenson
SD-C401-CDP25-2351 – James Doyle	SD-C401-CDP25-2352 – James Ffrench	SD-C401-CDP25-2353 – John Vaughan
SD-C401-CDP25-2354 – James Garrett	SD-C401-CDP25-2355 – James Murphy	SD-C401-CDP25-2356 – James O Brien
SD-C401-CDP25-2357 – Jane Ryan	SD-C401-CDP25-2358 – xx Varghese	SD-C401-CDP25-2359 – Jennifer Fox
SD-C401-CDP25-2360 – Jennifer Tierney	SD-C401-CDP25-2361 – Jack Bulter	SD-C401-CDP25-2362 – Jerry Fleming
SD-C401-CDP25-2363 – Karen Brodie	SD-C401-CDP25-2364 – Jimmy Doyle	SD-C401-CDP25-2365 – Jack Murphy
SD-C401-CDP25-2366 – JJ Redmond	SD-C401-CDP25-2367 – Joe Lancaster	SD-C401-CDP25-2368 – Joe Murphy
SD-C401-CDP25-2369 – Kevin Coughlan	SD-C401-CDP25-2370 – John Redmond	SD-C401-CDP25-2371 – John Bresnan
SD-C401-CDP25-2372 – Joan McCartney	SD-C401-CDP25-2373 – Kayleigh Cheny	SD-C401-CDP25-2374 – John Doyle
SD-C401-CDP25-2375 – John Garrett	SD-C401-CDP25-2376 – Joanne O'Shea	SD-C401-CDP25-2377 – John Handibode

SD-C401-CDP25-2378 – John Harte	SD-C401-CDP25-2379 – Joe Bevan	SD-C401-CDP25-2380 – Joe Egan
SD-C401-CDP25-2381 – Kiefa Connor	SD-C401-CDP25-2382 – John Kearney	SD-C401-CDP25-2383 – John O Connor
SD-C401-CDP25-2384 – John O Sullivan	SD-C401-CDP25-2385 – Kay Brodrick	SD-C401-CDP25-2386 – John O Toole
SD-C401-CDP25-2387 – Kate Doyle	SD-C401-CDP25-2388 – Lil Kinsella	SD-C401-CDP25-2389 – Liam Britton
SD-C401-CDP25-2390 – Karen Murphy	SD-C401-CDP25-2391 – Lara Delaney	SD-C401-CDP25-2392 – John Waine
SD-C401-CDP25-2393 – Lisa Geary	SD-C401-CDP25-2394 – Lisa McGuire	SD-C401-CDP25-2395 – Kathriona Pirie
SD-C401-CDP25-2396 – Lucy O'Doherty	SD-C401-CDP25-2397 – Lynn O'Dwyer	SD-C401-CDP25-2398 – Karen Wslsh
SD-C401-CDP25-2399 – Jonathan Byrne	SD-C401-CDP25-2400 – Lorraine Travers	SD-C401-CDP25-2401 – John Bresnan
SD-C401-CDP25-2402 – Jonathan Somers	SD-C401-CDP25-2403 – Karen Handibone	SD-C401-CDP25-2404 – Joseph Vera
SD-C401-CDP25-2405 – Julie Heinz	SD-C401-CDP25-2406 – Laura Crooke	SD-C401-CDP25-2407 – Julie Keogh
SD-C401-CDP25-2408 – Karen Murray	SD-C401-CDP25-2409 – Laura Curtin	SD-C401-CDP25-2410 – Lena Murphy
SD-C401-CDP25-2411 – Laura Tracey	SD-C401-CDP25-2412 – Leonora Acton	SD-C401-CDP25-2413 – Kate O'Brien

SD-C401-CDP25-2414 – Liam Collins	SD-C401-CDP25-2415 – Liam Goggin	SD-C401-CDP25-2416 – Liam Hayes
SD-C401-CDP25-2417 – Kate O' Grady	SD-C401-CDP25-2418 – Linda Ffrench	SD-C401-CDP25-2419 – Lauren Dawson
SD-C401-CDP25-2420 – Lisa Heery	SD-C401-CDP25-2421 – Lena Waine	SD-C401-CDP25-2422 – Kathrine Heary
SD-C401-CDP25-2423 – Lisa Kavanagh	SD-C401-CDP25-2424 – Niamh Burns	SD-C401-CDP25-2425 – Kathleen Keane
SD-C401-CDP25-2426 – Lorna Carroll	SD-C401-CDP25-2427 – Lorraine Daly	SD-C401-CDP25-2428 – N. Maloney
SD-C401-CDP25-2429 – Louise Whelan	SD-C401-CDP25-2430 – Luke Gannon	SD-C401-CDP25-2431 – Nilda Maongco
SD-C401-CDP25-2432 – Katie Murnaghan	SD-C401-CDP25-2433 – M Mullarkey	SD-C401-CDP25-2434 – Kb Mun
SD-C401-CDP25-2435 – Nessa McCall	SD-C401-CDP25-2436 – Maurice Britton	SD-C401-CDP25-2437 – Keith Nolan
SD-C401-CDP25-2438 – Mary Browne	SD-C401-CDP25-2439 – Maeve Byrne	SD-C401-CDP25-2440 – Nicoletia Niorella
SD-C401-CDP25-2441 – Mary Cunningham	SD-C401-CDP25-2442 – Kellie O'Brien	SD-C401-CDP25-2443 – Neha Ryan
SD-C401-CDP25-2444 – Niamh Fahey	SD-C401-CDP25-2445 – Maeve Dowling	SD-C401-CDP25-2446 – Mary Downes

SD-C401-CDP25-2447 – Martin Dunne	SD-C401-CDP25-2448 – Maura Hennelly	SD-C401-CDP25-2449 – Michael Kennedy
SD-C401-CDP25-2450 – Niamh Heery	SD-C401-CDP25-2451 – Niamh O'Brien	SD-C401-CDP25-2452 – Nicola D'Alba
SD-C401-CDP25-2453 – Nicola Smith	SD-C401-CDP25-2454 – Nigel Wright	SD-C401-CDP25-2455 – Nikki Sheerin
SD-C401-CDP25-2456 – Nina Butler	SD-C401-CDP25-2457 – Noel Crotty	SD-C401-CDP25-2458 – Noel Gilmore
SD-C401-CDP25-2459 – Noel Keane	SD-C401-CDP25-2460 – Noel Mollloy	SD-C401-CDP25-2461 – Noeleen Crotty
SD-C401-CDP25-2462 – Nora Butlter	SD-C401-CDP25-2463 – Noreen Keegan	SD-C401-CDP25-2464 – Maebh Loughnane
SD-C401-CDP25-2465 – Margaret Nolan	SD-C401-CDP25-2466 – Maria Martin Ochz	SD-C401-CDP25-2467 – Mairead Mc Breen
SD-C401-CDP25-2468 – Maureen Mc Glynn	SD-C401-CDP25-2469 – Majella Mc Keon	SD-C401-CDP25-2470 – Mick Morris
SD-C401-CDP25-2471 – Ken Saunders	SD-C401-CDP25-2472 – Marion Nestor	SD-C401-CDP25-2473 – Mirat Oari
SD-C401-CDP25-2474 – Kevin Dawson	SD-C401-CDP25-2475 – Mona O Brien	SD-C401-CDP25-2476 – Maria Stewart
SD-C401-CDP25-2477 – Kim Sharkey	SD-C401-CDP25-2478 – Michelle Walsh	SD-C401-CDP25-2479 – Mairead Madigan
SD-C401-CDP25-2480 – Kitty Flood	SD-C401-CDP25-2481 – Kyle Duff	SD-C401-CDP25-2482 – Margaret Gilmartin

SD-C401-CDP25-2483 – Margaret Tuffy	SD-C401-CDP25-2484 – Margurita McGeady	SD-C401-CDP25-2485 – Marian Reilly
SD-C401-CDP25-2486 – Marianne O'Connell	SD-C401-CDP25-2487 – Marie Anderson	SD-C401-CDP25-2488 – Marie Dardis
SD-C401-CDP25-2489 – Marie K	SD-C401-CDP25-2490 – Marie Kennedy	SD-C401-CDP25-2491 – O. Cahill
SD-C401-CDP25-2492 – Olivia Goldrick	SD-C401-CDP25-2493 – Olga & John Long	SD-C401-CDP25-2494 – Oliver Malone
SD-C401-CDP25-2495 – Olivia Thomas	SD-C401-CDP25-2496 – Ursula Eaton	SD-C401-CDP25-2497 – Una McDonald
SD-C401-CDP25-2498 – Ultan McDonagh	SD-C401-CDP25-2499 – Una Ní Mhuirí	SD-C401-CDP25-2500 – Venera Aranasova
SD-C401-CDP25-2501 – Veronica Hauyousc	SD-C401-CDP25-2502 – Val Poleon	SD-C401-CDP25-2503 – Valerie Maher
SD-C401-CDP25-2504 – Wah Wan Wan	SD-C401-CDP25-2505 – Wilfred Stevenson	SD-C401-CDP25-2506 – William Gleeson
SD-C401-CDP25-2507 – William Ryan	SD-C401-CDP25-2508 – William Poole	SD-C401-CDP25-2509 – Yvonne Finglas
SD-C401-CDP25-2510 – Yvonne O'Shea Michael Gatley	SD-C401-CDP25-2511 – Marie McCormack	SD-C401-CDP25-2512 – Mark Doyle

SD-C401-CDP25-2513 – Martin and Tonya O'Connell	SD-C401-CDP25-2514 – Martin Baxter	SD-C401-CDP25-2515 – Martin Mockler
SD-C401-CDP25-2516 – Martin O' Donoghue	SD-C401-CDP25-2517 – Martin Walsh	SD-C401-CDP25-2518 – Martina Butler
SD-C401-CDP25-2519 – Mary Dawson	SD-C401-CDP25-2520 – Mary Feeney	SD-C401-CDP25-2521 – Mary Heeny
SD-C401-CDP25-2522 – Mary Lacey	SD-C401-CDP25-2523 – Mary McGrath	SD-C401-CDP25-2524 – Mary Rafter
SD-C401-CDP25-2525 – Mary Reid	SD-C401-CDP25-2526 – Mary Scally	SD-C401-CDP25-2527 – Mary Smith
SD-C401-CDP25-2528 – Matthew Gannon	SD-C401-CDP25-2529 – Matthew Ward	SD-C401-CDP25-2530 – Maura O' Reilly
SD-C401-CDP25-2531 – Maureen Goggin	SD-C401-CDP25-2532 – Maureen and Seamus Kelly	SD-C401-CDP25-2533 – Maireád Madigan
SD-C401-CDP25-2534 – Marcus Carey	SD-C401-CDP25-2535 – Margaret Barnes	SD-C401-CDP25-2536 – Robert Collins
SD-C401-CDP25-2537 – Rory Downes	SD-C401-CDP25-2538 – Ronald Doyle	SD-C401-CDP25-2539 – Ruth Malone
SD-C401-CDP25-2540 – Rita Mc Cabe	SD-C401-CDP25-2541 – Raymond Campion	SD-C401-CDP25-2542 – Raymond Doyle
SD-C401-CDP25-2543 – Rebecca Coughlan	SD-C401-CDP25-2544 – Rena O Donnell	SD-C401-CDP25-2545 – Richard Heffernan

SD-C401-CDP25-2546 – Richie Feeney	SD-C401-CDP25-2547 – Rita O Brien	SD-C401-CDP25-2548 – Robert O Connell
SD-C401-CDP25-2549 – Robin Adamson	SD-C401-CDP25-2550 – Ronan Flynn	SD-C401-CDP25-2551 – Rosaleen Kelly
SD-C401-CDP25-2552 – Rosaleen Doyle	SD-C401-CDP25-2553 – Rosemary Farrelly Louis Mantoufeh	SD-C401-CDP25-2554 – Roy Cooper
SD-C401-CDP25-2555 – Ryan Mc Coy	SD-C401-CDP25-2556 – Patrick Brodie	SD-C401-CDP25-2557 – Patrick Byrne
SD-C401-CDP25-2558 – S. Brady	SD-C401-CDP25-2559 – Maureen O' Flynn	SD-C401-CDP25-2560 – Saija Collins
SD-C401-CDP25-2561 – Sarah Cullen	SD-C401-CDP25-2562 – Maurice Walsh	SD-C401-CDP25-2563 – May Bresnan
SD-C401-CDP25-2564 – Stuart Doyle	SD-C401-CDP25-2565 – May Mahon	SD-C401-CDP25-2566 – Siobhan Dunne
SD-C401-CDP25-2567 – Sarah Fahy	SD-C401-CDP25-2568 – Megan Ryan	SD-C401-CDP25-2569 – Siobhan Gray
SD-C401-CDP25-2570 – Melita Gorman	SD-C401-CDP25-2571 – Shay Hurson	SD-C401-CDP25-2572 – Michael Feeney
SD-C401-CDP25-2573 – Stephen McCabe	SD-C401-CDP25-2574 – Michael Heffernan	SD-C401-CDP25-2576 – Sean McClean

SD-C401-CDP25-2577 – Michael Marshall	SD-C401-CDP25-2578 – Sarah Mulconry	SD-C401-CDP25-2579 – Michael McShane
SD-C401-CDP25-2580 – Pamela Duggan	SD-C401-CDP25-2581 – Patrick Bradley	SD-C401-CDP25-2582 – Reece Lamphiere
SD-C401-CDP25-2583 – Roman Picoub	SD-C401-CDP25-2584 – Michael O'Brien	SD-C401-CDP25-2585 – Michaela Casey
SD-C401-CDP25-2586 – Michael Peasrse O'Connell	SD-C401-CDP25-2587 – Patrick Dunne	SD-C401-CDP25-2588 – Patrick Geraghty
SD-C401-CDP25-2589 – Peter Geraghty	SD-C401-CDP25-2590 – Michelle Coffey	SD-C401-CDP25-2591 – Paul Godsen
SD-C401-CDP25-2592 – Michelle Duffy	SD-C401-CDP25-2593 – Peter Gray	SD-C401-CDP25-2594 – Piotr Janowicz
SD-C401-CDP25-2595 – Sandra Muldowney	SD-C401-CDP25-2596 – Paul Cope	SD-C401-CDP25-2597 – Michelle MC Dermott
SD-C401-CDP25-2598 – Peggy Miller	SD-C401-CDP25-2599 – Phil Rountree	SD-C401-CDP25-2600 – P Sareene
SD-C401-CDP25-2601 – PT Moloney	SD-C401-CDP25-2602 – Selina O'Doherty	SD-C401-CDP25-2603 – Michelle McMahon
SD-C401-CDP25-2604 – Patrick Tarpey	SD-C401-CDP25-2605 – Patricia Treacy	SD-C401-CDP25-2606 – Siobhán O'Sullivan
SD-C401-CDP25-2607 – Paul Walsh	SD-C401-CDP25-2608 – Miguel Luca	SD-C401-CDP25-2609 – Pam Stacey

SD-C401-CDP25-2610 – Siobhán Rea	SD-C401-CDP25-2611 – Patilia Lidia	SD-C401-CDP25-2612 – Patricia Garrett
SD-C401-CDP25-2613 – Patricia O Brien	SD-C401-CDP25-2614 – Mike Heffernan	SD-C401-CDP25-2615 – Mr/Ms Santhosh
SD-C401-CDP25-2616 – Patricia O Ríordaín	SD-C401-CDP25-2617 – Seán Breen	SD-C401-CDP25-2618 – Patrick Phillips Bridget Phillips
SD-C401-CDP25-2619 – Molly Curtin	SD-C401-CDP25-2620 – Patrick Gorman	SD-C401-CDP25-2621 – Sandra Walsh
SD-C401-CDP25-2622 – Patrick Griffin	SD-C401-CDP25-2623 – Monica Carney	SD-C401-CDP25-2624 – Patrick Keegan
SD-C401-CDP25-2625 – Patrick Moran	SD-C401-CDP25-2626 – Paul Henderson	SD-C401-CDP25-2627 – Paul Murphy
SD-C401-CDP25-2628 – Sadhbh O'Connell	SD-C401-CDP25-2629 – Paul Smith	SD-C401-CDP25-2630 – Paul Waine
SD-C401-CDP25-2631 – Paula Mellon	SD-C401-CDP25-2632 – Peter Kelly Patricia Kelly	SD-C401-CDP25-2633 – Myra Moran
SD-C401-CDP25-2680 – Byrne Ann		
SD-C401-CDP25-2634 – Sharon Holland	SD-C401-CDP25-2635 – Peter O Toole	SD-C401-CDP25-2636 – Peter Larragy

SD-C401-CDP25-2637 – Shauna Smith	SD-C401-CDP25-2638 – Philomena Mc Shane	SD-C401-CDP25-2639 – Sheena Duffy
SD-C401-CDP25-2640 – Eamonn Smith	SD-C401-CDP25-2641 – Samuel Keogh	SD-C401-CDP25-2642 – Sarah Cooper
SD-C401-CDP25-2643 – Sarah Matthews	SD-C401-CDP25-2644 – Sheila Collins	SD-C401-CDP25-2645 – Sean Feeney
SD-C401-CDP25-2646 – Jai Ting Yang	SD-C401-CDP25-2647 – Sheila O' Toole	SD-C401-CDP25-2648 – Sinead Baxter
SD-C401-CDP25-2649 – Sally Martin	SD-C401-CDP25-2650 – Sarah Doyle	SD-C401-CDP25-2651 – Tatiana Izbas
SD-C401-CDP25-2652 – Sarah Doyle	SD-C401-CDP25-2653 – Tony McDonald	SD-C401-CDP25-2654 – Sarah Lynch
SD-C401-CDP25-2655 – Sarah Murphy	SD-C401-CDP25-2656 – Sarah Smith	SD-C401-CDP25-2657 – Sarah Smith
SD-C401-CDP25-2658 – Sinead Clarke	SD-C401-CDP25-2659 – Therese M. Pirie	SD-C401-CDP25-2660 – Sarah Tracey
SD-C401-CDP25-2661 – Shane Walker	SD-C401-CDP25-2662 – Siobhan O' Donnell	SD-C401-CDP25-2663 – Shane Whelan
SD-C401-CDP25-2664 – Teresa Seravo	SD-C401-CDP25-2665 – Trevor Treacy	SD-C401-CDP25-2666 – Siobhan Smith
SD-C401-CDP25-2667 – Tim Corbett	SD-C401-CDP25-2668 – Tim Griffin	SD-C401-CDP25-2669 – Tom Mullarkey

SD-C401-CDP25-2670 – Thomas & Patricia Keogh	SD-C401-CDP25-2671 – Sive Keogh	SD-C401-CDP25-2672 – Tony Ivers
SD-C401-CDP25-2673 – Triona Walsh	SD-C401-CDP25-2674 – Thomas Kavanagh	SD-C401-CDP25-2675 – Stephnie Jenkins Blairsdale
SD-C401-CDP25-2676 – K Durkin	SD-C401-CDP25-2677 – Stephen Costello	SD-C401-CDP25-2678 – Stuart Donnelly
SD-C401-CDP25-2679 – Stuart Doyle	SD-C401-CDP25-2680 – Byrne Ann	