

SAGGART COMMUNITY COUNCIL



Planning Representation

Proposed Material Alterations to Proposed Variation No. 2 to the South Dublin
County Development Plan 2022–2028

Submission in respect of Material Alteration MA5.1
Citywest and associated SEA and AA Screening documentation

Submitted by:
Saggart Community Council



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Submission Summary

This submission is made by Saggart Community Council in response to the Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028.

The submission relates primarily to Material Alteration MA5.1 concerning the former golf course lands at Citywest and seeks the inclusion of additional strategic infrastructure safeguards to ensure that future residential development is supported by education, water, wastewater, healthcare, childcare, community, recreation, transport and public open space infrastructure.

SCC supports sustainable housing delivery and respectfully requests that Citywest be afforded infrastructure safeguards equivalent to those applied to comparable major development areas elsewhere within Proposed Variation No. 2.



Executive Summary

This submission is made by **Saggart Community Council(SCC)** in response to the **Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028**, with particular reference to **Material Alteration MA5.1 (Citywest)** and the associated Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Screening Determinations.

SCC recognises the importance of increasing housing supply and acknowledges the significant improvements introduced through the proposed Material Alterations. We particularly welcome the inclusion of enhanced ecological protections, requirements for an Ecological Impact Assessment, ecologically informed lighting design, site-specific Flood Risk Assessment, consideration of existing water features, improved active travel connectivity and the proposed provision of a community centre/sports hall. These additions represent meaningful improvements to the original proposal.

However, while these amendments strengthen aspects of the proposal, they do not address what SCC considers to be the most significant remaining issue: **the absence of strategic infrastructure safeguards that the Council has required for comparable strategic development sites elsewhere within the same Proposed Variation.**

Throughout the Material Alterations, South Dublin County Council has recognised that large-scale residential development should be supported by comprehensive strategic planning measures, including Social Infrastructure Audits, educational capacity assessments, infrastructure master planning, utility capacity assessments and evidence-based evaluation of community facilities. These safeguards have been applied to several major growth areas across the county. However, despite the scale and strategic importance of the proposed Citywest development, equivalent requirements have not been included within Material Alteration MA5.1.

The principal purpose of this submission is therefore not to revisit the principle of residential development, but to request that the Council apply **the same planning standards consistently across all comparable strategic development areas**. In SCC 's view, there should be a clear and evidence-based rationale where materially different approaches are adopted. No such rationale is apparent within the published Material Alterations, SEA Screening Determination or accompanying documentation.

This submission also raises concerns regarding the SEA Screening Determination. While the Screening concludes that the proposed alterations will not give rise to additional significant environmental effects beyond those previously assessed, the documentation does not appear to explain how cumulative impacts associated with existing and projected infrastructure constraints, including education, healthcare, community facilities, recreation, potable water supply and wastewater infrastructure, were evaluated in reaching that conclusion.

SCC respectfully submits that these matters are integral to the achievement of proper planning and sustainable development. Strategic infrastructure planning should occur at Development Plan level wherever possible, providing certainty for communities, developers and decision-makers alike, rather than relying solely on future planning application processes to resolve fundamental capacity issues.

Accordingly, this submission requests targeted amendments to Material Alteration MA5.1 to ensure that Citywest benefits from strategic infrastructure safeguards equivalent to those proposed for other major development areas. Specifically, SCC recommends the inclusion of:



- A Social Infrastructure Audit.
- An Education Capacity Assessment undertaken in consultation with the Department of Education and Youth.
- Strategic assessment of healthcare, childcare, sports, recreation and community infrastructure.
- Confirmation of potable water supply and wastewater capacity, including consultation with Uisce Éireann where appropriate.
- Clear infrastructure phasing linking residential development to the timely delivery of supporting facilities and services.
- Strengthened implementation provisions for the proposed community centre/sports hall.
- Monitoring and review mechanisms to ensure infrastructure delivery keeps pace with population growth.

SCC believes that these recommendations are proportionate, evidence-based and fully consistent with the approach already adopted by the Council elsewhere within the Proposed Variation. Their inclusion would strengthen the Variation, promote consistency in strategic planning and help ensure that future development within Citywest is supported by the infrastructure necessary to create a sustainable, well-served and resilient community.

This submission is made in a constructive spirit. SCC appreciates the opportunity to participate in the statutory planning process and respectfully requests that the Council give full consideration to the observations and recommendations set out in the following sections before adopting the Proposed Material Alterations.



Key Recommendations

Saggart Community Council respectfully requests that South Dublin County Council amend Material Alteration MA5.1 (Citywest) to ensure that the Citywest lands are subject to strategic infrastructure safeguards equivalent to those applied to comparable major development areas elsewhere within Proposed Variation No. 2.

SCC makes the following key recommendations:

No.	Recommendation	Requested Amendment
1	Apply consistent safeguards to Citywest	Amend MA5.1 so that Citywest is subject to infrastructure safeguards equivalent to those included for other major growth areas, including Adamstown, Tubber Lane and Liffey Valley.
2	Require a Social Infrastructure Audit	Insert a requirement for a Social Infrastructure Audit to assess existing and future needs for schools, childcare, healthcare, community facilities, sports, recreation, youth facilities and other local services.
3	Require education capacity assessment	Insert a requirement that any masterplan or planning application be informed by consultation with the Department of Education and Youth and demonstrate sufficient primary and post-primary school capacity.
4	Require water and wastewater capacity confirmation	Insert a requirement for confirmation of potable water supply, wastewater capacity and any required network upgrades, in consultation with Uisce Éireann, before residential development proceeds.
5	Strengthen community centre/sports hall delivery	Retain the proposed community centre/sports hall requirement, but strengthen it by requiring a clear delivery timetable, public accessibility, and delivery in tandem with residential occupation.
6	Require sports and recreation assessment	Insert a requirement for an evidence-based sports and recreation assessment, including indoor and outdoor facilities, playing pitches, youth recreation and community-accessible amenities.
7	Strengthen infrastructure phasing	Require that residential development be phased alongside delivery of supporting infrastructure, including education, community, transport, water and recreational facilities.
8	Strengthen active travel delivery	Require the proposed active travel link between Mill Road and Garter Lane to be delivered at an early phase of development, rather than left to a later or undefined stage.

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No.	Recommendation	Requested Amendment
9	Clarify SEA assessment of cumulative impacts	Request that the SEA Screening Determination explain how cumulative impacts relating to education, healthcare, water, wastewater, recreation and community infrastructure were assessed.
10	Provide clear rationale for different treatment of Citywest	Request that the Council clearly explain why Citywest has not been assigned the same level of strategic infrastructure safeguards applied to comparable major development sites within the same Variation.

SCC submits that these recommendations are proportionate, constructive and consistent with the Council's own approach elsewhere in the Proposed Material Alterations. Their inclusion would not prevent housing delivery. Rather, they would help ensure that future residential development at Citywest proceeds in a planned, phased and sustainable manner, supported by the infrastructure and services required by both existing and future residents.



Chapter 1 – Planning Context

1.1 Introduction

This submission is made by Saggart Community Council (SCC) in response to the public consultation on the **Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028**, published following resolutions of South Dublin County Council on 19 and 24 June 2026.

The submission relates primarily to **Material Alteration MA5.1**, concerning lands at Citywest, together with the associated Strategic Environmental Assessment (SEA) Screening Determination, Appropriate Assessment (AA) Screening Determination and accompanying environmental documentation.

SCC has actively participated throughout the Variation process by making detailed submissions at the draft stage. We appreciate that a number of amendments have been incorporated through the Material Alterations and acknowledge the work undertaken by the Planning Authority in reviewing submissions received during the statutory consultation process.

This submission focuses solely on those matters that remain outstanding following publication of the Material Alterations.

1.2 Commitment to Sustainable Development

SCC recognises the pressing national and regional need to increase housing delivery and supports the objective of providing additional homes in appropriate locations.

We also recognise that Citywest has been identified as an important strategic growth area within the County Development Plan and that significant residential development will play an important role in meeting future housing demand.

However, sustainable development requires more than the delivery of housing alone.

The Planning and Development Act 2024 places sustainable development at the heart of the planning system. Development Plans are intended not only to identify land for development, but also to ensure that growth is supported by the infrastructure, services, environmental protections and community facilities necessary to create balanced, resilient and sustainable communities.

The question raised by this submission is therefore not whether development should occur, but whether the strategic planning framework for Citywest contains safeguards equivalent to those applied elsewhere within the same Proposed Variation.

1.2A Proper Planning and Sustainable Development

The overarching purpose of the statutory planning system is to secure proper planning and sustainable development in the long-term public interest. Development Plans play a central role in achieving this objective by ensuring that land identified for future growth is supported by the strategic



infrastructure, environmental safeguards and community facilities necessary to create balanced and sustainable communities.

Large-scale residential development should therefore be accompanied by strategic consideration of matters including educational provision, healthcare, transport, utilities, recreation, community facilities and environmental capacity. While many of these matters will be examined in greater detail at planning application stage, the Development Plan establishes the strategic framework within which those decisions will subsequently be made.

Accordingly, where the Planning Authority has determined that additional strategic safeguards are required for comparable growth areas elsewhere within Proposed Variation No. 2, it is reasonable to expect that the same planning principles should be applied consistently unless a clear planning justification exists for adopting a different approach.

This submission is founded on that principle of consistency. It does not seek to revisit the strategic decision to accommodate future housing growth within Citywest. Rather, it seeks to ensure that such growth is supported by an appropriate strategic planning framework which reflects the Council's own approach elsewhere within the Proposed Material Alterations and promotes the delivery of sustainable communities in accordance with the objectives of the Development Plan.

1.3 Purpose of the Material Alterations

The publication of the Proposed Material Alterations represents an important stage in the statutory development plan process.

Following consideration of submissions received on the original Proposed Variation, the elected members resolved to introduce a number of amendments to the draft proposals.

These amendments include additional planning requirements relating to:

- ecological protection;
- biodiversity;
- flood risk management;
- transport;
- active travel;
- community facilities; and
- infrastructure planning.

SCC welcomes many of these amendments and considers them to be positive improvements to the original proposal.

Nevertheless, the Material Alterations also demonstrate that the Council has recognised the need to strengthen strategic safeguards across several major development areas.

It is against this revised planning framework that MA5.1 should now be assessed.

1.4 The Importance of Consistency



One of the fundamental principles of the statutory planning system is consistency in decision-making.

Where planning authorities determine that particular safeguards are necessary to secure proper planning and sustainable development in one strategic growth area, there should be a clear planning rationale where materially different approaches are adopted elsewhere.

This principle is particularly important where developments are comparable in terms of:

- scale;
- anticipated population growth;
- infrastructure demands;
- environmental effects; and
- long-term strategic importance.

The Material Alterations demonstrate that South Dublin County Council has concluded that several strategic development sites require additional safeguards, including Social Infrastructure Audits, educational capacity assessments, infrastructure master planning and utility assessments.

However, despite the scale of proposed development at Citywest, equivalent safeguards have not been incorporated into Material Alteration MA5.1.

This submission respectfully seeks clarification of the planning basis for that distinction and requests amendments to ensure a consistent approach across comparable strategic development areas.

1.5 Scope of this Submission

This submission is confined to matters arising from the Proposed Material Alterations and associated environmental documentation.

It does not seek to reopen issues that have already been determined through previous stages of the Variation process except where those issues remain directly relevant to the adequacy of the Material Alterations themselves.

In particular, this submission examines:

- the consistency of infrastructure safeguards across major development sites;
- educational capacity;
- social and community infrastructure;
- water and wastewater infrastructure;
- implementation and phasing of community facilities;
- the adequacy of the SEA Screening Determination;
- the adequacy of the AA Screening Determination insofar as it relates to the Material Alterations; and
- proposed amendments to strengthen Material Alteration MA5.1.

Throughout this submission, SCC seeks to make constructive recommendations capable of being incorporated into the final Variation.



1.6 Guiding Principle

The central proposition advanced throughout this submission is straightforward.

The Council has already accepted, through the Proposed Material Alterations, that large-scale residential development should be supported by robust strategic planning safeguards.

SCC respectfully submits that these safeguards should be applied consistently to all comparable strategic development areas unless there is a clearly articulated planning rationale for adopting a different approach.

Our recommendations are therefore not intended to delay or prevent housing delivery. Rather, they seek to ensure that future development within Citywest is accompanied by the strategic infrastructure, community facilities and public services necessary to achieve the objectives of proper planning and sustainable development.

It is in that constructive spirit that the following chapters are submitted for the Council's consideration.



Chapter 2 – Comparative Analysis of Material Alterations

2.1

This chapter compares **Material Alteration MA5.1 (Citywest)** with other Material Alterations proposed as part of Proposed Variation No. 2.

The purpose of this comparison is not to suggest that all development sites are identical. Each site has its own characteristics, constraints and opportunities. However, where sites are being brought forward for significant residential development, it is reasonable to expect that comparable strategic safeguards will be applied, particularly where those safeguards relate to matters such as education, utilities, social infrastructure, community facilities, recreation, transport and phasing.

SCC respectfully submits that the published Material Alterations demonstrate an inconsistent approach. A number of major development areas have been assigned detailed infrastructure safeguards, while the Citywest lands have not been assigned equivalent requirements, despite the scale and strategic importance of the site.

This chapter identifies those differences and explains why SCC considers that MA5.1 should be strengthened.

2.2 Summary of MA5.1 – Citywest

Material Alteration MA5.1 proposes to amend CS8 SLO2 in respect of the former golf course lands at Citywest Hotel.

The revised wording requires that development on the RES-N zoned lands shall be in accordance with a masterplan prepared by the Planning Authority or in consultation with, and approved by, the Planning Authority, in advance of any residential planning application.

The masterplan is to be informed by and address the following matters:

- Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species.
- Ecologically informed lighting design.
- Transport and Traffic Assessment.
- Direct active travel link through the lands between Mill Road and Garter Lane.
- Site-specific Flood Risk Assessment addressing ornamental surface water features and the unmodelled watercourse to the south.
- Analysis of existing water features for incorporation into wider nature-based surface water management where feasible.
- Provision for a community centre/sports hall of approximately 1,500sqm, or as agreed with the Planning Authority.

SCC welcomes these additions. They are positive and necessary improvements.

However, when compared with the safeguards proposed for other major development areas, MA5.1 remains notably limited.



It focuses primarily on ecology, traffic, flood risk, surface water features, active travel and a single community/sports hall provision. It does not include equivalent safeguards relating to education, social infrastructure, healthcare, childcare, sports/recreation audit, potable water supply, wastewater capacity or phased infrastructure delivery.

2.3 Comparison with Adamstown SDZ West – MA2.1

Material Alteration MA2.1, relating to Adamstown SDZ West, includes a significantly more detailed strategic infrastructure framework.

The Adamstown wording provides that:

- no significant residential development shall commence until DART+ Southwest, or an equivalent rail service, is operational;
- an infrastructure masterplan must address water and wastewater network upgrades necessary to serve the lands;
- the infrastructure masterplan must demonstrate that the needs of surrounding zoned lands, including Clonburris SDZ, are not compromised;
- the infrastructure masterplan must be agreed with Uisce Éireann before submission of a planning application;
- a masterplan must be prepared before a planning application;
- the masterplan must include a Social Infrastructure Audit;
- a Public Open Space Audit must inform public open space and recreational facilities;
- adequate educational capacity must be ensured in consultation with the Department of Education and Youth.

By contrast, MA5.1 for Citywest contains no equivalent requirement for:

- educational capacity assessment;
- Social Infrastructure Audit;
- Uisce Éireann agreement;
- potable water or wastewater confirmation;
- public open space/recreation audit;
- infrastructure phasing linked to transport or services.

SCC respectfully submits that this difference is significant.

If such safeguards are considered necessary for Adamstown SDZ West, it is difficult to understand why comparable safeguards are not considered necessary for Citywest, particularly given existing infrastructure pressures in the wider Citywest/Saggart/Rathcoole area.

2.4 Comparison with Tubber Lane North – MA4.1

Material Alteration MA4.1, relating to Tubber Lane North, also contains a detailed and phased infrastructure framework.

The Tubber Lane wording includes:



- no commencement of development until DART+ Southwest has commenced construction or an equivalent rail service is operational;
- no commencement until Tobermaclugg Park has commenced construction;
- an infrastructure masterplan addressing water and wastewater network upgrades;
- demonstration that surrounding zoned lands, including Clonburris SDZ, are not compromised;
- agreement with Uisce Éireann in advance of a planning application;
- a masterplan prepared before any planning application;
- ecological safeguards;
- a Social Infrastructure Audit;
- proactive engagement with relevant State agencies;
- Transport and Traffic Assessment;
- Public Open Space Audit;
- recreational facilities assessment;
- educational capacity assessment in consultation with the Department of Education and Youth.

Again, these are not minor matters. They are strategic safeguards intended to ensure that development is supported by necessary infrastructure and services.

MA5.1 for Citywest does include some comparable environmental safeguards, particularly in relation to ecology, lighting and flood risk. However, it does not include the wider social, educational, utility and phasing safeguards applied to Tubber Lane North.

SCC considers that the difference in approach should be expressly justified or corrected through additional wording in MA5.1.

2.5 Comparison with Liffey Valley MRC – MA16.1 and MA16.2

Material Alteration MA16.1, relating to Liffey Valley MRC, includes express requirements regarding education, public realm, community facilities and master planning.

The proposed wording requires that:

- development shall have regard to the requirements of the Department of Education and Youth;
- any planning application shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development;
- future masterplans and residential development proposals should maximise opportunities for basement or underground parking where feasible;
- this approach is intended to minimise surface-level parking and maximise land for public open space, community facilities, active travel infrastructure, landscaping, biodiversity measures and high-quality public realm;
- residential development shall include provision of a multi-purpose community centre unless otherwise agreed by the Planning Authority.

MA16.2 also provides for a review, including public consultation, of car parking policy, provision, management and ancillary infrastructure in the context of the Compact Settlement Guidelines.



The Liffey Valley approach is notable because it requires evidence of school capacity before development proceeds.

Citywest has no equivalent requirement, notwithstanding the scale of anticipated growth and existing concerns regarding school capacity in the wider area.

SCC respectfully submits that if evidence of sufficient school capacity is required for Liffey Valley, an equivalent requirement should be included for Citywest.

2.6 Comparison with Ballynakelly, Newcastle – MA1.1

Material Alteration MA1.1, relating to Ballynakelly, Newcastle, includes a number of important safeguards.

The wording requires development to be in accordance with a masterplan and provides for:

- delivery of a public park of a minimum of 2 hectares in tandem with, or prior to, development of the site;
- reservation of a secondary school site of 3 hectares unless otherwise agreed by the Planning Authority having regard to the requirements of the Department of Education and Youth;
- active travel connections;
- use of an existing unfinished structure in an early phase of development in a sustainable manner compatible with neighbouring residential uses, with consideration given to sports/community space where feasible.

This is an important comparison because Ballynakelly includes direct linkage between residential development and early delivery or reservation of supporting infrastructure.

By contrast, MA5.1 includes provision for a community centre/sports hall but does not specify when it must be delivered, whether it must be delivered before occupation of any defined number of units, or how public accessibility will be secured.

SCC considers that the Citywest wording should be strengthened so that community infrastructure is delivered in tandem with residential development rather than left to an undefined later stage.

2.7 Comparison with Knockmeenagh Framework Site – MA9.1

Material Alteration MA9.1, relating to the Knockmeenagh Framework Site, requires a phasing and delivery plan for the REGEN zoned lands before any planning application.

That plan must:

- be integrated with adjoining land uses;
- deliver on the parameters of the Knockmeenagh Framework Site;
- include an evidence-based investigation of the potential for delivery of an all-weather pitch;
- include a transport and movement plan;
- be prepared in liaison with TII, NTA and landowners;
- be agreed with TII and the NTA.



This is relevant because it demonstrates that South Dublin County Council has, elsewhere within the Material Alterations, recognised the importance of evidence-based assessment of sports infrastructure and phasing before development proceeds.

MA5.1 contains provision for a community centre/sports hall, but no wider evidence-based sports and recreation assessment.

It also contains no phasing and delivery plan equivalent to that required for Knockmeenagh.

Given existing and projected population growth in the Citywest/Saggart area, SCC submits that an evidence-based sports and recreation assessment should be incorporated into MA5.1.

2.8 Comparison with Future Strategic Development Areas – MA17.1 and MA17.2

Material Alterations MA17.1 and MA17.2 relate to Adamstown South and West Outer lands and future strategic development planning.

MA17.1 requires an Area-Based Transport Assessment to consider DART+ Southwest, Luas to Lucan, road infrastructure and existing bus services at the early stages of the ABTA process, in order to identify transport options for assessment against existing and future demand scenarios.

MA17.2 requires the plan-led approach for any future Strategic Development Area to include investigation of the need for:

- an additional rail station;
- appropriate community infrastructure;
- recreation and leisure infrastructure;
- public swimming pool;
- multi-sport campus comprising indoor and outdoor facilities;
- Garda station;
- health facilities;
- delivery mechanisms for such infrastructure where required.

These provisions are particularly relevant because they demonstrate a comprehensive understanding of what sustainable strategic growth requires. They do not treat housing delivery as separate from transport, recreation, healthcare, community facilities and policing/community safety infrastructure.

SCC respectfully submits that the same planning logic applies to Citywest.

MA5.1 should therefore include strategic assessment of community, recreation, healthcare and community safety infrastructure, proportionate to the scale of development proposed.

2.9 Comparison with Haughan's Field, Cornerpark, Newcastle – MA65.1

Material Alteration MA65.1 proposes rezoning lands at Haughan's Field, Cornerpark, Newcastle from Rural to New Residential and includes a new Specific Local Objective.

The wording provides that no development shall commence until a masterplan has been agreed with the Planning Authority showing how approximately 2 hectares maximum of land within the RES



zoning will be integrated as part of housing development to deliver a sports centre/facility for a local sports club, including pitch, clubhouse and training pitches.

This is another example of the Council linking residential zoning with specific sports infrastructure requirements.

By contrast, MA5.1 provides only for a community centre/sports hall of approximately 1,500sqm, or as agreed with the Planning Authority.

It does not require a wider sports centre, pitches, training facilities, outdoor recreation assessment or delivery mechanism.

SCC does not suggest that the exact same facilities are required at every location. However, given the scale of development proposed at Citywest and the acknowledged need for community and sports infrastructure in rapidly growing areas, SCC submits that a more robust, evidence-based sports and recreation requirement should be included.

2.10 Comparative Matrix

The following table summarises the key infrastructure safeguards applied across selected Material Alterations and compares them with MA5.1 for Citywest.

Safeguard / Requirement	Adamstown SDZ West MA2.1	Tubber Lane North MA4.1	Liffey Valley MA16.1	Ballynakelly MA1.1	Knockmeena MA9.1	Haughan's Field MA65.1	Citywest MA5.1
Masterplan before planning application	Yes	Yes	Yes / future masterplans	Yes	Phasing and delivery plan	Yes	Yes
Social Infrastructure Audit	Yes	Yes	Partial community/public realm focus	No	No	No	No
Education capacity assessment	Yes	Yes	Yes	Secondary school reservation	No	No	No
Department of Education consultation	Yes	Yes	Yes	Yes	No	No	No
Water/wastewater capacity assessment	Yes	Yes	No express equivalent	No express equivalent	No express equivalent	No express equivalent	No

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Safeguard / Requirement	Adamstown SDZ West MA2.1	Tubber Lane North MA4.1	Liffey Valley MA16.1	Ballynakelly MA1.1	Knockmeena MA9.1	Haughan's Field MA65.1	Citywest MA5.1
Uisce Éireann agreement	Yes	Yes	No express equivalent	No express equivalent	No express equivalent	No express equivalent	No
Public open space audit	Yes	Yes	Public realm/open space emphasis	Public park delivery	No	No	No
Sports/recreation assessment	Yes, through open space/recreation audit	Yes, through open space/recreation audit	Community centre provision	Sports/community use considered	All-weather pitch investigation	Sports centre/pitch/clubhouse/training pitches	Limited to 1,500sqm community/sports hall
Healthcare assessment	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No
Garda/community safety infrastructure assessment	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No
Public transport delivery trigger	Yes	Yes	No express trigger	No express trigger	Transport/movement plan	No express trigger	No
Infrastructure phasing	Yes	Yes	Partial	Park in tandem/prior to development	Yes	No development until masterplan agreed	Limited / unclear
Active travel	Infrastructure connections	Access to high-capacity public transport	Active travel/public realm emphasis	Active travel connections	Transport/movement plan	No express equivalent	Active travel link only
Community facility delivery	Indirect through audit	Indirect through audit	Multi-purpose	Sports/community space	Sports facility investigation	Sports centre/facility	Community centre/sports hall, but



Safeguard / Requirement	Adamstown SDZ West MA2.1	Tubber Lane North MA4.1	Liffey Valley MA16.1	Ballynakell MA1.1	Knockmeena MA9.1	Haughan's Field MA65.1	Citywest MA5.1
			community centre	consideration			no delivery trigger

This matrix demonstrates that Citywest has been assigned some important environmental and mobility safeguards, but significantly fewer strategic social and infrastructure safeguards than several comparable locations.

2.11 Key Findings from the Comparative Analysis

The comparison above identifies the following key findings:

1. Citywest lacks an education safeguard

Several other Material Alterations require consultation with the Department of Education and Youth or evidence of school capacity. Citywest does not.

2. Citywest lacks a Social Infrastructure Audit

Adamstown and Tubber Lane require Social Infrastructure Audits. Citywest does not.

3. Citywest lacks water and wastewater safeguards

Adamstown and Tubber Lane require infrastructure masterplans addressing water and wastewater upgrades, agreed with Uisce Éireann. Citywest does not.

4. Citywest lacks clear infrastructure phasing

Other sites include commencement restrictions, delivery triggers or phasing plans. Citywest does not include comparable phasing requirements for education, utilities or community infrastructure.

5. Citywest lacks a wider sports and recreation assessment

Other sites require public open space audits, evidence-based sports facility investigation, or specific sports centre provision. Citywest only provides for a community centre/sports hall without an accompanying sports and recreation assessment.

6. Citywest lacks a healthcare, community safety or wider services assessment

Future strategic development areas include investigation of health facilities and Garda station needs. Citywest does not contain comparable assessment provisions.

2.12 SCC 's Position

SCC respectfully submits that the comparative analysis demonstrates a material inconsistency in the safeguards proposed for Citywest when compared with other strategic development areas within Proposed Variation No. 2.

This does not mean that every site must have identical wording. However, where the Council has considered certain safeguards necessary elsewhere, there should be a clear planning rationale where those safeguards are omitted from Citywest.



No such rationale is apparent from the published Material Alterations or associated SEA/AA Screening documentation.

SCC therefore requests that MA5.1 be amended to include equivalent safeguards relating to:

- Social Infrastructure Audit;
- educational capacity;
- Department of Education consultation;
- potable water and wastewater capacity;
- Uisce Éireann engagement;
- healthcare, childcare and community infrastructure;
- sports and recreation;
- phasing and delivery;
- active travel implementation; and
- monitoring of infrastructure delivery alongside housing growth.

2.13 Conclusion

The Material Alterations show that South Dublin County Council has accepted the need for stronger strategic safeguards in several major development locations.

SCC welcomes that approach.

However, the same approach should be applied consistently to Citywest.

The Citywest lands should not proceed under a materially weaker strategic planning framework than comparable residential growth areas elsewhere in the county.

SCC therefore respectfully requests that MA5.1 be revised to incorporate the additional safeguards identified in this chapter and set out in the recommendations of this submission.



Chapter 3 – Infrastructure Assessment

Education, Water, Healthcare, Recreation and Community Infrastructure

3.1

This chapter addresses the key infrastructure matters which SCC submits should be expressly incorporated into **Material Alteration MA5.1 (Citywest)**.

The issues addressed are:

- education;
- water and wastewater;
- healthcare;
- sports and recreation;
- community infrastructure;
- childcare and youth facilities; and
- cumulative infrastructure pressure.

SCC does not suggest that all infrastructure questions can be finally resolved at Development Plan stage. However, the Development Plan should establish a clear strategic framework requiring these matters to be assessed, planned and delivered in a timely and coordinated manner.

This is particularly important where land is being rezoned for significant residential development in an area already experiencing rapid population growth.

3.2 Strategic Infrastructure Should Be Addressed at Plan Stage

The Proposed Material Alterations demonstrate that South Dublin County Council recognises the need for strategic infrastructure safeguards in several major growth areas.

For example, the Material Alterations require or refer to:

- Social Infrastructure Audits;
- educational capacity assessment;
- consultation with the Department of Education and Youth;
- infrastructure master planning;
- water and wastewater assessment;
- Uisce Éireann engagement;
- public open space audits;
- sports/recreation assessment;
- transport phasing; and
- community facility provision.

SCC welcomes this approach.

However, MA5.1 for Citywest does not currently include equivalent safeguards for education, utilities, healthcare, childcare, sports/recreation or wider social infrastructure.



SCC submits that this omission is particularly significant because Citywest, Saggart and the surrounding area have experienced substantial residential growth over recent years, while local infrastructure has not kept pace with population expansion.

3.3 Education Infrastructure

3.3.1 Existing Concern

Education capacity is one of the most significant infrastructure concerns for existing and future residents of Citywest, Saggart and the wider Rathcoole/Newcastle catchment.

SCC has previously raised concerns regarding:

- pressure on primary school places;
- pressure on post-primary school places;
- distance travelled by children to access school places;
- delays in permanent school delivery;
- reliance on temporary or interim school accommodation;
- projected population growth arising from existing and proposed residential development.

SCC has also obtained and reviewed Department of Education information indicating projected future school capacity pressures within the wider Newcastle, Rathcoole, Saggart and Citywest area. This evidence will be included in the appendices to this submission.

3.3.2 Comparison with Other Material Alterations

The absence of an education safeguard in MA5.1 is difficult to reconcile with the Council's approach elsewhere in the Material Alterations.

For example:

- **Adamstown SDZ West** requires that adequate educational capacity for sites adjacent to Adamstown be catered for in consultation with the Department of Education and Youth.
- **Tubber Lane North** requires educational capacity to be ensured in consultation with the Department of Education and Youth.
- **Liffey Valley MRC** requires planning applications to be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development.
- **Ballynakelly, Newcastle** includes reservation of a secondary school site unless otherwise agreed having regard to the requirements of the Department of Education and Youth.

No equivalent requirement is included for Citywest.

SCC respectfully submits that where the Council has determined that educational capacity safeguards are necessary elsewhere, an equivalent requirement should be included for Citywest.

3.3.3 Requested Amendment

SCC requests that MA5.1 be amended to include the following requirement:



Any masterplan or planning application for residential development on the Citywest lands shall be informed by consultation with the Department of Education and Youth and shall demonstrate that sufficient primary and post-primary educational capacity exists, or will be delivered in tandem with development, to serve both existing and proposed population growth in the Citywest, Saggart and wider catchment area.

3.4 Water and Wastewater Infrastructure

3.4.1 Distinction Between Flood Risk and Utility Capacity

SCC welcomes the inclusion in MA5.1 of:

- a site-specific Flood Risk Assessment;
- analysis of ornamental surface water features;
- consideration of nature-based surface water management.

However, these measures address surface water and flood risk. They do not address the separate issues of:

- potable water supply;
- water pressure;
- wastewater network capacity;
- wastewater treatment capacity;
- network upgrades required to serve cumulative development.

These are distinct infrastructure matters and should be expressly addressed.

3.4.2 Comparison with Other Material Alterations

The Council has included express water and wastewater safeguards elsewhere.

For example, Adamstown SDZ West requires an infrastructure masterplan addressing water and wastewater network upgrades necessary to serve the lands, while also demonstrating that the needs of surrounding zoned lands are not compromised. It also requires agreement with Uisce Éireann in advance of a planning application.

Tubber Lane North contains similar requirements for water and wastewater network upgrades, again requiring agreement with Uisce Éireann before submission of a planning application.

No equivalent requirement is included in MA5.1 for Citywest.

3.4.3 Requested Amendment

SCC requests that MA5.1 be amended to include the following requirement:

Any masterplan or planning application for residential development on the Citywest lands shall be accompanied by confirmation, following consultation with Uisce Éireann, that sufficient potable water supply, water pressure, wastewater network capacity and wastewater treatment capacity exist, or that necessary upgrades will be delivered in tandem with development.



The assessment shall also demonstrate that the needs of existing communities and other zoned lands in the wider area will not be compromised.

3.5 Healthcare Infrastructure

3.5.1 Existing Concern

Healthcare provision is a material consideration in the creation of sustainable communities.

The Citywest, Saggart and Rathcoole area has experienced rapid growth and further residential development will increase demand for:

- general practitioner services;
- primary care;
- pharmacy services;
- public health nursing;
- mental health supports;
- disability services;
- older persons' services;
- child and family health services.

SCC is concerned that MA5.1 contains no requirement to assess whether healthcare infrastructure is sufficient to serve existing and future residents.

3.5.2 Comparison with Other Strategic Planning Provisions

The Material Alterations relating to Future Strategic Development Areas expressly refer to investigation of health facilities as part of a plan-led approach to long-term growth.

This demonstrates that the Council recognises healthcare infrastructure as part of strategic sustainable planning.

SCC submits that the same principle should apply to Citywest, particularly given the scale of proposed development and existing service pressures in the wider area.

3.5.3 Requested Amendment

SCC requests that MA5.1 be amended to require:

A healthcare infrastructure assessment, prepared as part of the masterplan process, identifying existing healthcare provision, projected demand arising from proposed development, and any additional primary care or community health infrastructure required to support sustainable residential growth.

3.6 Sports and Recreation Infrastructure

3.6.1 Existing Concern



Sports and recreation infrastructure is essential to sustainable community development, particularly in areas with growing numbers of children, young people and families.

SCC has consistently raised concerns regarding the shortage of:

- playing pitches;
- all-weather facilities;
- indoor sports facilities;
- youth recreation space;
- informal recreation areas;
- community-accessible sports halls;
- multi-use outdoor amenities.

The proposed inclusion of a community centre/sports hall in MA5.1 is welcomed.

However, on its own, it is not a substitute for an evidence-based sports and recreation assessment.

3.6.2 Comparison with Other Material Alterations

The Council has included more specific sports and recreation safeguards elsewhere.

Examples include:

- Ballynakelly, where use of an existing unfinished structure for sports/community space is to be considered.
- Knockmeenagh, where an evidence-based investigation of the potential for delivery of an all-weather pitch is required.
- Haughan's Field, where no development shall commence until a masterplan shows how land will be integrated as part of housing development to deliver a sports centre/facility including pitch, clubhouse and training pitches.
- Future Strategic Development Areas, where investigation of recreation and leisure infrastructure, including a swimming pool and multi-sport campus, is required.

By contrast, MA5.1 refers only to a community centre/sports hall of approximately 1,500sqm, or as agreed with the Planning Authority.

SCC submits that this is not sufficient to assess the full sports and recreation needs arising from a major residential development.

3.6.3 Requested Amendment

SCC requests that MA5.1 be amended to require:

A Sports and Recreation Infrastructure Assessment, including assessment of indoor and outdoor recreation needs, playing pitch demand, youth recreation, informal recreation space, all-weather facilities and community-accessible sports facilities, with delivery mechanisms identified through the masterplan.

3.7 Community Infrastructure

3.7.1 Importance of Community Infrastructure



Community infrastructure is not optional. It is central to the delivery of sustainable communities.

For a growing area such as Citywest/Saggart, community infrastructure should include consideration of:

- community centres;
- meeting rooms;
- youth facilities;
- older persons' facilities;
- cultural and arts space;
- library access;
- family support services;
- civic space;
- indoor recreation;
- safe community gathering spaces.

SCC welcomes the proposed provision for a community centre/sports hall of approximately 1,500sqm.

However, the wording does not currently specify:

- when the facility must be delivered;
- whether it must be delivered before occupation of a defined proportion of homes;
- whether it must be publicly accessible;
- whether it must be capable of serving both existing and future residents;
- whether it is additional to, or instead of, other community infrastructure requirements.

3.7.2 Comparison with Other Material Alterations

The Council has required Social Infrastructure Audits and community facility assessments elsewhere.

For example, Adamstown SDZ West and Tubber Lane North require Social Infrastructure Audits, while Liffey Valley includes provision for a multi-purpose community centre.

SCC submits that Citywest should be subject to a similar evidence-based approach.

3.7.3 Requested Amendment

SCC requests that MA5.1 be amended to include:

A Social Infrastructure Audit assessing existing provision and future requirements for community facilities, healthcare, childcare, education, sports, recreation, youth services, older persons' services and other local services, with identified infrastructure to be delivered in tandem with residential development.

3.8 Childcare and Youth Infrastructure

3.8.1 Existing Concern

Childcare and youth infrastructure are particularly important in areas experiencing rapid residential growth.



Additional housing will increase demand for:

- early years childcare;
- after-school care;
- youth services;
- safe recreation spaces;
- family support services;
- facilities for teenagers and young adults.

These needs should not be considered only at individual planning application stage. The masterplan should identify likely cumulative demand and ensure that provision is coordinated across the development.

3.8.2 Requested Amendment

SCC requests that the Social Infrastructure Audit for Citywest expressly include:

- childcare demand;
- youth facility requirements;
- teenage recreation provision;
- safe community spaces;
- family support infrastructure.

3.9 Cumulative Infrastructure Pressure

3.9.1 Wider Growth Context

Citywest should not be assessed in isolation.

The wider Citywest, Saggart, Rathcoole and Newcastle area is already experiencing significant cumulative growth from:

- existing residential development;
- recently permitted development;
- planned development;
- proposed rezonings;
- population growth across adjoining settlements;
- increased demand on shared schools, roads, healthcare services, water infrastructure and recreation facilities.

SCC submits that cumulative infrastructure pressure is central to the assessment of whether MA5.1 provides an adequate strategic planning framework.

3.9.2 SEA Relevance

The SEA Screening repeatedly concludes that the Material Alterations do not give rise to additional significant environmental effects beyond those already assessed.

However, SCC considers that the published SEA Screening does not clearly explain how cumulative infrastructure effects were assessed in respect of Citywest, particularly in relation to:



- school capacity;
- healthcare provision;
- community infrastructure;
- sports and recreation;
- potable water supply;
- wastewater capacity;
- cumulative population growth;
- pressure on existing services.

SCC submits that these matters are relevant to sustainable development and should be expressly addressed.

3.10 Conclusion

SCC respectfully submits that the infrastructure matters addressed in this chapter are not peripheral concerns. They are central to the achievement of proper planning and sustainable development.

The Material Alterations show that South Dublin County Council has recognised the importance of such safeguards elsewhere within Proposed Variation No. 2.

Citywest should be afforded an equivalent level of strategic planning protection.

SCC therefore requests that MA5.1 be amended to require:

1. Social Infrastructure Audit.
2. Education Capacity Assessment.
3. Department of Education and Youth consultation.
4. Potable water and wastewater capacity confirmation.
5. Uisce Éireann consultation.
6. Healthcare infrastructure assessment.
7. Sports and Recreation Infrastructure Assessment.
8. Childcare and youth infrastructure assessment.
9. Infrastructure phasing linked to housing delivery.
10. Clear delivery mechanisms for the proposed community centre/sports hall.

These amendments would not prevent housing delivery. They would support housing delivery by ensuring that development is planned, coordinated and accompanied by the services and infrastructure required by existing and future residents.



Chapter 4 – Review of Material Alteration MA5.1

Citywest – Former Golf Course Lands

4.1

This chapter reviews the wording of **Material Alteration MA5.1**, which relates to the proposed Citywest lands.

SCC welcomes a number of important improvements introduced through MA5.1. These include requirements relating to ecology, lighting, transport assessment, active travel, flood risk, surface water features and provision for a community centre/sports hall.

However, SCC respectfully submits that MA5.1 remains incomplete because it does not include several strategic infrastructure safeguards that have been applied to other comparable development areas within Proposed Variation No. 2.

This chapter therefore examines each element of MA5.1 and identifies where the wording should be retained, clarified or strengthened.

4.2 Current Proposed Wording of MA5.1

Material Alteration MA5.1 proposes to amend **CS8 SLO2** as follows:

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, prepared by the Planning Authority or in consultation with, and approved by, the Planning Authority, in advance of a planning application for residential development.

The masterplan is to be informed by and address:

- an Ecological Impact Assessment;
- ecological lighting design;
- Transport and Traffic Assessment;
- direct active travel link between Mill Road and Garter Lane;
- site-specific Flood Risk Assessment;
- analysis of existing water features for potential nature-based surface water management; and
- provision for a community centre/sports hall of approximately 1,500sqm, or as agreed with the Planning Authority.

SCC welcomes the inclusion of a masterplan requirement. This is an important safeguard and should be retained.

However, the masterplan requirement should be expanded so that it properly addresses the full range of strategic infrastructure issues arising from the proposed scale of development.

4.3 Masterplan Requirement



4.3.1 What is Positive

SCC welcomes the requirement that development must be in accordance with a masterplan prepared by, or in consultation with and approved by, the Planning Authority before a residential planning application is submitted.

This provides an opportunity to ensure that the lands are not developed in a piecemeal or uncoordinated manner.

A masterplan is particularly important at Citywest because the site is not an isolated parcel of land. It sits within a wider area already experiencing substantial development pressure and infrastructure demand.

4.3.2 What Requires Strengthening

The current wording does not specify that the masterplan must include:

- Social Infrastructure Audit;
- Education Capacity Assessment;
- healthcare assessment;
- childcare assessment;
- sports and recreation assessment;
- water and wastewater infrastructure assessment;
- Uisce Éireann consultation;
- phasing and delivery programme;
- implementation mechanisms;
- monitoring arrangements.

By comparison, other Material Alterations include more detailed master planning and infrastructure provisions, including water/wastewater assessment, Social Infrastructure Audits, education requirements, open space audits and phasing arrangements.

4.3.3 SCC Position

SCC respectfully submits that the masterplan for Citywest should not be limited to design, ecology, traffic, flood risk and a single community/sports hall. It should be a full strategic infrastructure masterplan capable of guiding sustainable residential development.

4.3.4 Requested Amendment

SCC requests that the masterplan requirement be amended to state that it shall include:

A Social Infrastructure Audit, Education Capacity Assessment, healthcare assessment, childcare assessment, sports and recreation assessment, water and wastewater infrastructure assessment, phasing programme and implementation strategy to ensure that housing delivery is aligned with supporting infrastructure and services.

4.4 Ecological Impact Assessment

4.4.1 What is Positive



SCC welcomes the proposed requirement for an **Ecological Impact Assessment** to ascertain usage of the site and surrounding lands by mobile species.

The proposed wording requires that EIAs be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with CIEEM Guidelines for Ecological Impact Assessment, including any superseding guidance.

This is a positive amendment.

It recognises that the former golf course lands may have ecological value, including as part of a wider habitat network.

4.4.2 What Requires Clarification

The wording should clarify that the EIA must be undertaken before the masterplan is finalised, not merely at planning application stage.

The EIA should inform:

- layout;
- retention of trees and hedgerows;
- protection of habitats;
- lighting strategy;
- drainage strategy;
- open space design;
- biodiversity enhancement;
- construction phasing.

4.4.3 Requested Amendment

SCC requests that the wording be clarified as follows:

The Ecological Impact Assessment shall be undertaken at masterplan stage and shall inform the layout, open space strategy, lighting design, drainage strategy, habitat retention, biodiversity enhancement measures and phasing of development.

4.5 Lighting Design

4.5.1 What is Positive

SCC welcomes the requirement that lighting design and implementation should be informed by ecological surveys and should seek to minimise impacts on wildlife through sensitive design.

This is particularly important where lands may be used by bats, birds or other mobile species.

4.5.2 What Requires Strengthening

The wording should ensure that lighting design is not considered in isolation. It should be integrated with:

- ecological corridors;



- open space;
- active travel routes;
- public safety;
- residential amenity;
- construction management;
- operational management.

4.5.3 Requested Amendment

SCC requests that the lighting requirement be strengthened to state:

A site-wide Lighting Strategy shall be prepared at masterplan stage, informed by ecological surveys, public safety considerations and residential amenity, and shall demonstrate how impacts on wildlife, ecological corridors and neighbouring residents will be minimised during both construction and operation.

4.6 Transport and Traffic Assessment

4.6.1 What is Positive

MA5.1 requires a **Transport and Traffic Assessment** detailing the impact of the proposed development and measures to alleviate its impact.

SCC welcomes this requirement.

Traffic and transport impacts are significant considerations for the Citywest/Saggart area, particularly given existing congestion, school traffic, commuter movements, Luas dependency and reliance on limited local road infrastructure.

4.6.2 What Requires Strengthening

The current wording requires assessment but does not require:

- transport mitigation to be delivered;
- phasing of development in accordance with transport upgrades;
- assessment of cumulative impacts from other developments;
- public transport capacity assessment;
- pedestrian and cyclist safety assessment;
- school travel assessment;
- construction traffic management;
- monitoring after occupation.

By comparison, Tubber Lane North includes transport-related phasing and requires options capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport.

4.6.3 Requested Amendment

SCC requests that the transport requirement be strengthened as follows:

A Transport and Traffic Assessment shall assess cumulative impacts on the local and wider road network, public transport capacity, pedestrian and cyclist safety, school travel impacts and



construction traffic. The masterplan shall identify mitigation measures, delivery mechanisms and phasing requirements to ensure that transport infrastructure is delivered in tandem with residential development.

4.7 Active Travel Link Between Mill Road and Garter Lane

4.7.1 What is Positive

SCC welcomes the proposed direct active travel link through the subject lands between Mill Road and Garter Lane.

This has the potential to improve permeability, walking and cycling connections and local movement between existing and future neighbourhoods.

4.7.2 What Requires Strengthening

The wording does not specify:

- when the active travel link must be delivered;
- whether it must be delivered before occupation of homes;
- whether it must be fully public and accessible;
- whether it must be safely lit;
- whether it must be designed for universal accessibility;
- whether it must connect effectively to existing footpaths, cycle infrastructure, schools, public transport and community facilities.

Without clear phasing, there is a risk that the active travel link may be delivered late in the development process, reducing its usefulness to existing and early-phase residents.

4.7.3 Requested Amendment

SCC requests that the wording be strengthened as follows:

The direct active travel link between Mill Road and Garter Lane shall be designed as a safe, universally accessible and publicly available route and shall be delivered at an early phase of development, prior to or in tandem with first occupation, unless otherwise agreed in writing by the Planning Authority for stated planning reasons.

4.8 Flood Risk Assessment

4.8.1 What is Positive

SCC welcomes the proposed requirement for a site-specific Flood Risk Assessment addressing both the ornamental surface water features within the site and the unmodelled watercourse to the south.

This is a necessary and positive safeguard.

Flood risk should be assessed before the layout and development capacity of the lands are finalised.

4.8.2 What Requires Clarification



The wording should clarify that the Flood Risk Assessment must:

- be completed at masterplan stage;
- inform land-use layout;
- identify flood risk areas;
- protect natural drainage features;
- assess climate change impacts;
- include exceedance routes;
- ensure no increased flood risk to adjoining lands;
- be integrated with SuDS and nature-based surface water management.

4.8.3 Requested Amendment

SCC requests that the flood risk wording be strengthened as follows:

A site-specific Flood Risk Assessment shall be prepared at masterplan stage and shall inform the layout, developable area, open space strategy, drainage design and phasing of the development. The assessment shall address climate change, exceedance routes, downstream impacts and ensure that development does not increase flood risk on adjoining or downstream lands.

4.9 Existing Water Features and Nature-Based Surface Water Management

4.9.1 What is Positive

SCC welcomes the requirement for analysis of existing water features and their potential incorporation as part of wider nature-based surface water management.

This is consistent with sustainable drainage principles and could support biodiversity, amenity and climate adaptation.

4.9.2 What Requires Strengthening

The wording should require the analysis to be integrated with:

- biodiversity strategy;
- public open space;
- flood risk assessment;
- SuDS;
- ecological corridors;
- long-term maintenance;
- water quality protection.

The wording should also distinguish clearly between surface water management and separate issues of potable water supply and wastewater capacity.

4.9.3 Requested Amendment

SCC requests that the wording be strengthened as follows:



Existing water features shall be assessed for retention and integration into a site-wide blue-green infrastructure and SuDS strategy, with regard to biodiversity, amenity, water quality, flood risk, climate adaptation and long-term maintenance. This requirement shall be separate from, and additional to, assessment of potable water supply and wastewater capacity.

4.10 Community Centre / Sports Hall

4.10.1 What is Positive

SCC strongly welcomes the inclusion of provision for a community centre/sports hall of approximately 1,500sqm, or as agreed with the Planning Authority.

This is an important acknowledgement that residential development must be supported by community infrastructure.

The inclusion of this requirement is a positive response to community concerns and should be retained.

4.10.2 What Requires Strengthening

The current wording is too open-ended.

It does not specify:

- whether 1,500sqm is a minimum or indicative figure;
- when the facility must be delivered;
- whether it must be publicly accessible;
- whether it must serve existing as well as future residents;
- whether it must include indoor sports capacity;
- whether it will be managed publicly, privately or by agreement;
- whether it must be delivered before occupation of a defined proportion of homes;
- whether it is additional to other social infrastructure requirements.

The phrase “or as agreed with the Planning Authority” could allow the facility to be reduced or altered without clear criteria.

SCC is concerned that without specific delivery and phasing requirements, the facility could be delayed until a late stage of development.

4.10.3 Comparison with Other Material Alterations

Other Material Alterations contain more specific delivery provisions.

For example:

- Ballynakelly requires delivery of a public park of a minimum of 2 hectares in tandem with, or prior to, development of the site.
- Haughan’s Field requires that no development shall commence until a masterplan has been agreed showing how land will be integrated as part of housing development to deliver a sports centre/facility including pitch, clubhouse and training pitches.



SCC submits that Citywest should have similarly clear delivery wording.

4.10.4 Requested Amendment

SCC requests that the community centre/sports hall requirement be strengthened as follows:

Provision shall be made for a publicly accessible community centre/sports hall of approximately 1,500sqm, or such greater or alternative provision as may be justified by a Social Infrastructure Audit and agreed with the Planning Authority. The facility shall be delivered in tandem with residential development and shall be operational prior to occupation of a defined proportion of dwellings, to be agreed through the masterplan. The masterplan shall identify its location, specification, delivery mechanism, management arrangements and public accessibility.

4.11 Missing Requirement: Social Infrastructure Audit

4.11.1 Current Omission

MA5.1 does not currently require a Social Infrastructure Audit.

This is a significant omission.

A Social Infrastructure Audit would assess existing and future needs for:

- schools;
- childcare;
- healthcare;
- community facilities;
- sports and recreation;
- youth services;
- older persons' services;
- cultural facilities;
- local services;
- public open space;
- community safety infrastructure.

4.11.2 Comparison with Other Material Alterations

Social Infrastructure Audits are required in other major development areas, including Adamstown SDZ West and Tubber Lane North.

SCC respectfully submits that there is no clear planning rationale for omitting such a requirement from Citywest.

4.11.3 Requested Amendment

SCC requests that MA5.1 include:

A Social Infrastructure Audit shall be prepared as part of the masterplan process to assess existing and future needs for education, childcare, healthcare, sports, recreation, community facilities, youth services, older persons' services and other local services, and shall identify delivery mechanisms for any required infrastructure.



4.12 Missing Requirement: Education Capacity Assessment

4.12.1 Current Omission

MA5.1 does not currently require consultation with the Department of Education and Youth or demonstration of sufficient school capacity.

This is a serious omission given existing and projected growth across Citywest, Saggart, Rathcoole and the wider catchment.

4.12.2 Comparison with Other Material Alterations

Other Material Alterations include express requirements for educational capacity or Department of Education involvement, including Adamstown, Tubber Lane, Liffey Valley and Ballynakelly.

4.12.3 Requested Amendment

SCC requests that MA5.1 include:

The masterplan shall be informed by consultation with the Department of Education and Youth and shall demonstrate that sufficient primary and post-primary school capacity exists, or will be delivered in tandem with development, to serve existing and proposed population growth.

4.13 Missing Requirement: Water and Wastewater Capacity

4.13.1 Current Omission

MA5.1 includes flood risk and surface water provisions but does not include requirements relating to potable water supply, water pressure, wastewater network capacity or wastewater treatment capacity.

4.13.2 Comparison with Other Material Alterations

Adamstown SDZ West and Tubber Lane North include express requirements for water and wastewater network upgrades and agreement with Uisce Éireann before planning applications are submitted.

No equivalent wording is included for Citywest.

4.13.3 Requested Amendment

SCC requests that MA5.1 include:

The masterplan shall include confirmation, following consultation with Uisce Éireann, that sufficient potable water supply, water pressure, wastewater network capacity and wastewater treatment capacity exist, or that necessary upgrades will be delivered in tandem with development. The assessment shall demonstrate that existing communities and surrounding zoned lands will not be adversely affected.

4.14 Missing Requirement: Infrastructure Phasing and Delivery



4.14.1 Current Omission

MA5.1 does not include a detailed phasing and delivery requirement.

This is a significant weakness because infrastructure that is not tied to clear delivery stages can be delayed until late in the development process.

4.14.2 What Should Be Included

The masterplan should include a phasing programme identifying:

- number of dwellings per phase;
- infrastructure required before each phase;
- community centre/sports hall delivery trigger;
- active travel delivery trigger;
- water and wastewater upgrades;
- school capacity arrangements;
- sports and recreation delivery;
- transport mitigation;
- monitoring and review points.

4.14.3 Requested Amendment

SCC requests that MA5.1 include:

A phasing and implementation programme shall be agreed as part of the masterplan and shall identify the timing, delivery responsibility and funding/delivery mechanism for all required infrastructure. Residential occupation shall be linked to the timely delivery of supporting infrastructure and services.

4.15 Overall Assessment of MA5.1

SCC welcomes the improvements introduced through MA5.1.

The inclusion of ecology, lighting, flood risk, surface water, active travel, transport assessment and a community centre/sports hall are positive and should be retained.

However, MA5.1 remains incomplete.

It does not currently provide a sufficiently robust strategic infrastructure framework for a major residential development at Citywest.

In particular, it does not include:

1. Social Infrastructure Audit.
2. Education Capacity Assessment.
3. Department of Education and Youth consultation.
4. Uisce Éireann consultation.
5. Potable water supply confirmation.
6. Wastewater capacity confirmation.
7. Healthcare assessment.
8. Childcare assessment.



9. Sports and recreation assessment.
10. Detailed community centre delivery trigger.
11. Public accessibility requirement.
12. Active travel delivery trigger.
13. Infrastructure phasing programme.
14. Monitoring and implementation arrangements.

SCC respectfully submits that these matters should be incorporated before the final adoption of the Material Alterations.

4.16 Conclusion

MA5.1 represents an improvement on the original Citywest wording, but it does not yet provide the level of strategic safeguarding required for sustainable residential development.

The Council has included more detailed infrastructure safeguards for other major development areas within the same Proposed Variation. SCC respectfully submits that equivalent safeguards should be applied to Citywest unless a clear planning rationale is provided for their omission.

SCC therefore requests that MA5.1 be further amended to provide a comprehensive master planning, infrastructure, phasing and delivery framework for the Citywest lands.

The detailed wording requested by SCC is set out in Chapter 6 of this submission.



Chapter 5 – Review of SEA and AA Screening

Proposed Material Alterations to Proposed Variation No. 2

5.1

This chapter reviews the **Strategic Environmental Assessment (SEA) Screening** and **Appropriate Assessment (AA) Screening** documentation prepared in respect of the Proposed Material Alterations to Proposed Variation No. 2.

SCC acknowledges that SEA and AA screening are specialist environmental assessment processes and does not purport to substitute its own technical assessment for that of the appointed environmental consultants or the Planning Authority.

However, SCC respectfully submits that the published SEA and AA Screening documentation raises important issues requiring clarification before the Proposed Material Alterations are adopted, particularly in relation to **Material Alteration MA5.1 (Citywest)**.

The purpose of this chapter is therefore to identify where the reasoning should be expanded, clarified or supplemented to ensure that the final decision is supported by a transparent and robust assessment process.

5.2 Summary of SEA Screening Position

The SEA Screening Report states that the purpose of the assessment is to determine whether the proposed material alterations are likely to give rise to significant environmental effects. The Screening concludes that the proposed changes are minor in scale, type and location, and that they do not generate significant environmental or land-use effects beyond those already assessed in the SEA Environmental Report or addressed through existing environmental protection measures in the South Dublin County Development Plan 2022–2028.

The Screening also states that no cumulative effects are identified at strategic scale, subject to adherence to existing environmental protection measures and mitigation already provided through the SEA and AA process of Proposed Variation No. 2.

In respect of MA5.1 Citywest, the SEA Screening states that the amendments strengthen environmental protection for biodiversity and water resources and that the alteration does not give rise to additional land-use or environmental effects beyond those already assessed through the SEA process. It is therefore screened out for SEA.

SCC welcomes the additional environmental safeguards in MA5.1. However, the conclusion that no additional SEA-level assessment is required should be more fully explained, particularly in light of cumulative infrastructure issues and the inconsistent application of strategic safeguards across comparable sites.

5.3 Summary of AA Screening Position



The AA Screening Determination states that, following examination, analysis and evaluation of the relevant information, including the nature of the alterations and their potential relationship with European sites and conservation objectives, and having considered other plans and projects and applied the precautionary principle, the Screening determined that there is no potential for likely significant effects on any European sites.

The Determination concludes that Stage 2 Appropriate Assessment, including the preparation of a Natura Impact Report, is not required.

SCC notes this conclusion and does not seek to challenge the AA Screening on ecological grounds without expert evidence.

However, SCC requests that the Council ensure the final AA Screening Determination clearly addresses any amendments ultimately made to MA5.1, particularly if additional infrastructure, water, wastewater, drainage, active travel or community facility requirements are inserted following consultation.

5.4 SCC 's General Position on the SEA and AA Screening

SCC 's position is balanced.

SCC welcomes the inclusion of:

- Ecological Impact Assessment;
- ecologically informed lighting design;
- site-specific Flood Risk Assessment;
- consideration of water features;
- nature-based surface water management;
- active travel provision;
- community/sports hall provision.

These are positive additions.

However, SCC respectfully submits that the SEA Screening gives insufficient explanation of how wider cumulative infrastructure impacts were assessed, particularly in relation to:

- education;
- healthcare;
- childcare;
- community infrastructure;
- sports and recreation;
- potable water supply;
- wastewater capacity;
- transport capacity;
- cumulative population growth;
- phasing and delivery of supporting infrastructure.

These matters are central to sustainable development and should be explicitly addressed where a major residential rezoning is proposed.



5.5 Concern 1 – Reliance on “No Additional Effects” Reasoning

The SEA Screening repeatedly relies on the conclusion that the Material Alterations do not give rise to additional land-use or environmental effects beyond those previously assessed.

SCC understands that this may be appropriate where alterations are genuinely minor, clarificatory or protective.

However, in the case of Citywest, MA5.1 is not merely a technical correction. It introduces new and revised requirements governing how a major residential development is to be master planned and delivered.

The Screening conclusion would be strengthened if it explained:

- what environmental topics were reconsidered for MA5.1;
- how cumulative infrastructure pressures were assessed;
- whether the omission of education, water/wastewater and social infrastructure safeguards was considered;
- why the safeguards applied elsewhere were not considered necessary for Citywest;
- whether the existing SEA Environmental Report adequately assessed the final form of MA5.1.

SCC respectfully requests that the final SEA Screening Determination provide a clearer explanation of these matters.

5.6 Concern 2 – Cumulative Infrastructure Impacts

The SEA Screening states that no cumulative effects are identified at strategic scale.

SCC respectfully submits that this conclusion requires further explanation in respect of Citywest.

Citywest should not be assessed in isolation. The wider area is already subject to cumulative pressure arising from:

- existing residential growth;
- permitted developments;
- proposed rezonings;
- population growth in Citywest, Saggart, Rathcoole and Newcastle;
- shared reliance on schools, roads, water infrastructure, healthcare and community facilities;
- existing deficits in community and recreation provision.

SCC is concerned that the SEA Screening appears to focus primarily on ecological and surface water considerations, without clearly explaining how cumulative effects on strategic infrastructure and sustainable community development were assessed.

SCC therefore requests that the SEA Screening be supplemented to expressly address cumulative impacts relating to:



1. educational capacity;
2. childcare capacity;
3. healthcare provision;
4. community infrastructure;
5. sports and recreation provision;
6. potable water supply;
7. wastewater infrastructure;
8. local transport capacity;
9. population growth across the wider catchment.

5.7 Concern 3 – Human Health and Community Wellbeing

The SEA Screening states that no risks to human health or the environment are identified on foot of the assessment of the changes.

SCC respectfully submits that, in the context of sustainable planning, human health and community wellbeing should not be understood narrowly.

For a major residential development, human health and wellbeing may be affected by:

- access to healthcare;
- access to schools;
- access to safe open space;
- access to recreation and sports facilities;
- traffic and road safety;
- safe active travel;
- water and wastewater infrastructure;
- community facilities;
- social cohesion;
- youth facilities;
- ability of infrastructure to keep pace with growth.

SCC is not asserting that MA5.1 will necessarily have significant adverse effects on human health. Rather, SCC submits that the Screening should explain how these matters were considered, particularly where other Material Alterations include safeguards addressing related infrastructure and community needs.

5.8 Concern 4 – Surface Water Measures Do Not Address Potable Water or Wastewater Capacity

MA5.1 includes positive provisions relating to Flood Risk Assessment, ornamental water features and nature-based surface water management.

However, these provisions do not address separate utility infrastructure issues, namely:

- potable water supply;
- water pressure;



- wastewater network capacity;
- wastewater treatment capacity;
- cumulative demand on existing services.

The SEA Screening discussion of cumulative impacts refers to surface water management and existing Sustainable Drainage Systems requirements within the Development Plan.

SCC respectfully submits that reliance on surface water and SuDS policies does not answer the separate question of whether potable water and wastewater infrastructure are sufficient to serve the cumulative level of residential development proposed.

This distinction is important because Adamstown and Tubber Lane include express requirements for water and wastewater infrastructure master planning and Uisce Éireann agreement. Comparable wording is absent from MA5.1.

SCC therefore requests that the SEA Screening be clarified to address potable water and wastewater infrastructure separately from flood risk and surface water management.

5.9 Concern 5 – Deferral to Future Planning Applications

The SEA Screening notes that future projects arising from Proposed Variation No. 2 will be subject to relevant national planning procedures, including lower-tier Appropriate Assessment, Environmental Impact Assessment and other licensing requirements where appropriate.

SCC accepts that future planning applications will require their own assessments.

However, reliance on future consent processes should not replace strategic assessment at Development Plan stage.

The purpose of the Development Plan is to provide the strategic framework for future development. Where known or foreseeable infrastructure constraints exist, they should be addressed through the Development Plan and associated Specific Local Objectives wherever possible.

SCC respectfully submits that future planning applications should not be left to resolve fundamental strategic questions such as:

- whether school capacity exists;
- whether water/wastewater capacity exists;
- whether community infrastructure is sufficient;
- whether healthcare provision is adequate;
- whether recreation and sports infrastructure are sufficient;
- whether development should be phased according to infrastructure delivery.

These matters should be embedded in MA5.1 now, as they have been embedded elsewhere within the Proposed Material Alterations.

5.10 Concern 6 – Inconsistent Treatment Across Comparable Sites



The SEA Screening identifies enhanced environmental protection measures for certain alterations and acknowledges that some sites include master planning and public transport commitments before development.

However, the Screening does not appear to explain why Citywest receives a narrower set of safeguards than other comparable development areas.

As set out in Chapter 2 of this submission, other Material Alterations include:

- Social Infrastructure Audits;
- education capacity requirements;
- Department of Education consultation;
- water/wastewater infrastructure master planning;
- Uisce Éireann agreement;
- public open space audits;
- sports/recreation assessment;
- infrastructure phasing;
- transport delivery triggers.

MA5.1 includes some important environmental protections, but it omits many of these strategic infrastructure safeguards.

SCC respectfully submits that the SEA Screening should explain whether this inconsistency was considered and, if so, why it does not affect the conclusion that no additional SEA-level assessment or mitigation is required.

5.11 Concern 7 – Adequacy of Mitigation and Safeguards

The SEA Screening relies, in part, on existing environmental protection measures in the County Development Plan and mitigation measures already provided through the SEA and AA process of the Proposed Variation.

SCC accepts that existing Development Plan policies are relevant.

However, where the Council has inserted site-specific safeguards elsewhere, this demonstrates that general Development Plan policies alone were not considered sufficient in every case.

SCC therefore submits that the same logic should be applied to Citywest.

If site-specific infrastructure safeguards are necessary for Adamstown, Tubber Lane, Liffey Valley, Ballynakelly, Knockmeenagh and Haughan's Field, the Council should either:

- include equivalent safeguards for Citywest; or
- clearly explain why Citywest does not require them.

5.12 AA Screening – SCC Position

SCC does not seek to make a technical ecological objection to the AA Screening Determination without expert ecological evidence.



SCC notes that the AA Screening Determination concludes that Stage 2 AA and preparation of a Natura Impact Report are not required.

However, SCC respectfully requests that the Council ensure the AA Screening is kept under review in light of any final amendments to MA5.1.

In particular, if further wording is added concerning:

- water and wastewater infrastructure;
- drainage;
- surface water management;
- active travel routes;
- community centre/sports hall location;
- lighting;
- ecological corridors;
- blue-green infrastructure;
- phasing;

then the Council should ensure that the AA Screening conclusion remains valid for the final adopted wording.

5.13 Requested Clarifications and Amendments

SCC respectfully requests that South Dublin County Council:

1. Clarify how cumulative infrastructure impacts were considered in the SEA Screening for MA5.1.
2. Clarify how the SEA Screening assessed education, healthcare, childcare, recreation, community infrastructure, potable water and wastewater capacity.
3. Clarify why Citywest has not been assigned equivalent strategic infrastructure safeguards to those applied elsewhere in the Proposed Material Alterations.
4. Distinguish clearly between surface water/flood risk measures and potable water/wastewater infrastructure capacity.
5. Explain the extent to which reliance on future planning applications is considered sufficient to address strategic infrastructure issues.
6. Confirm whether the SEA Screening has considered the final cumulative effect of residential growth across Citywest, Saggart, Rathcoole and Newcastle.
7. Confirm that the AA Screening conclusion remains valid for any final amendments made to MA5.1 following consultation.
8. Amend MA5.1 to include the additional safeguards requested in this submission, thereby strengthening the environmental and planning framework for Citywest.

5.14 Conclusion

SCC welcomes the positive environmental amendments included in MA5.1 and acknowledges the conclusions reached in the SEA and AA Screening documentation.



However, SCC respectfully submits that the SEA Screening reasoning should be expanded and clarified, particularly in relation to cumulative infrastructure impacts and the inconsistent application of site-specific safeguards across comparable development areas.

The issue is not whether housing should be delivered.

The issue is whether housing at Citywest will be delivered within a strategic framework that adequately addresses education, water, wastewater, healthcare, recreation, community facilities and phasing.

SCC submits that these matters should be addressed through strengthened wording in MA5.1 and through clearer reasoning in the final SEA and AA Screening Determinations.

This approach would improve transparency, strengthen the robustness of the final Variation and support the delivery of genuinely sustainable development at Citywest.



Chapter 6 – Proposed Revised Wording for MA5.1

Citywest – Former Golf Course Lands

6.1

This chapter sets out SCC 's proposed revised wording for **Material Alteration MA5.1**, relating to the former golf course lands at Citywest.

SCC welcomes the proposed amendments already included in MA5.1, including the requirements for Ecological Impact Assessment, lighting design, Transport and Traffic Assessment, active travel, Flood Risk Assessment, water feature analysis and provision for a community centre/sports hall.

However, for the reasons set out in the preceding chapters, SCC respectfully submits that the wording should be strengthened to include strategic infrastructure safeguards equivalent to those applied elsewhere within Proposed Variation No. 2.

The wording below is proposed in a constructive spirit. It is intended to be capable of direct incorporation into the final Variation, or alternatively to assist the Planning Authority in preparing equivalent strengthened wording.

6.2 SCC 's Proposed Replacement Wording for CS8 SLO2

SCC respectfully requests that **CS8 SLO2** be amended as follows:

Proposed CS8 SLO2 – Citywest

Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a comprehensive 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 any planning application for residential development.

The masterplan shall be informed by and address, inter alia, the following:

a. Ecological Impact Assessment

An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, to be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with the Chartered Institute of Ecology and Environmental Management Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, and any superseding guidance.

The Ecological Impact Assessment shall be undertaken at masterplan stage and shall inform the layout, open space strategy, lighting design, drainage strategy, habitat retention, biodiversity enhancement measures and phasing of development.

b. Lighting Strategy



A site-wide Lighting Strategy, informed by ecological surveys, public safety considerations and residential amenity, demonstrating how impacts on wildlife, ecological corridors and neighbouring residents will be minimised during both construction and operation.

Lighting design and implementation shall 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

A Transport and Traffic Assessment detailing the impact of the proposed development and identifying measures to alleviate its impact.

The assessment shall include consideration of cumulative impacts on the local and wider road network, public transport capacity, pedestrian and cyclist safety, school travel impacts and construction traffic. The masterplan shall identify mitigation measures, delivery mechanisms and phasing requirements to ensure that transport infrastructure is delivered in tandem with residential development.

d. Active Travel Link

Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane.

The active travel link shall be designed as a safe, universally accessible and publicly available route and shall be delivered at an early phase of development, prior to or in tandem with first occupation, unless otherwise agreed in writing by the Planning Authority for stated planning reasons.

The route shall connect effectively with existing and planned walking, cycling, public transport, school and community infrastructure.

e. Flood Risk Assessment

A site-specific Flood Risk Assessment addressing both the ornamental surface water features within the site and the unmodelled watercourse to the south.

The Flood Risk Assessment shall be prepared at masterplan stage and shall inform the layout, developable area, open space strategy, drainage design and phasing of the development. The assessment shall address climate change, exceedance routes, downstream impacts and ensure that development does not increase flood risk on adjoining or downstream lands.

f. Blue-Green Infrastructure and Water Features

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.

Existing water features shall be assessed for retention and integration into a site-wide blue-green infrastructure and Sustainable Drainage Systems strategy, having regard to biodiversity, amenity, water quality, flood risk, climate adaptation and long-term maintenance.

This requirement shall be separate from, and additional to, assessment of potable water supply and wastewater capacity.

g. Water and Wastewater Infrastructure



Confirmation, following consultation with Uisce Éireann, that sufficient potable water supply, water pressure, wastewater network capacity and wastewater treatment capacity exist to serve the proposed development.

Where upgrades are required, the masterplan shall identify the required upgrades, delivery mechanisms and phasing arrangements. The assessment shall also demonstrate that the needs of existing communities and surrounding zoned lands will not be compromised by the development.

h. Social Infrastructure Audit

A Social Infrastructure Audit assessing existing provision and future requirements for education, childcare, healthcare, sports, recreation, community facilities, youth services, older persons' services, cultural facilities, public open space and other local services.

The Social Infrastructure Audit shall identify any deficits arising from existing and proposed population growth and shall set out how required infrastructure will be delivered in tandem with residential development.

i. Education Capacity Assessment

An Education Capacity Assessment, prepared in consultation with the Department of Education and Youth, demonstrating that sufficient primary and post-primary school capacity exists, or will be delivered in tandem with development, to serve both existing and proposed population growth in Citywest, Saggart and the wider catchment area.

Where additional school capacity is required, the masterplan shall identify appropriate delivery mechanisms, including reservation of land where required.

j. Healthcare Infrastructure Assessment

A healthcare infrastructure assessment identifying existing healthcare provision, projected demand arising from the proposed development and any additional primary care, community health or related healthcare infrastructure required to support sustainable residential growth.

The assessment shall be prepared having regard to existing and planned healthcare provision in the wider Citywest, Saggart and Rathcoole area.

k. Childcare and Youth Infrastructure

Assessment of childcare and youth infrastructure requirements, including early years childcare, after-school care, youth services, teenage recreation, safe community spaces and family support infrastructure.

The masterplan shall identify how childcare and youth infrastructure needs arising from the development will be addressed.

l. Sports and Recreation Infrastructure

A Sports and Recreation Infrastructure Assessment, including assessment of indoor and outdoor recreation needs, playing pitch demand, youth recreation, informal recreation space, all-weather facilities and community-accessible sports facilities.



The assessment shall identify delivery mechanisms for any required sports and recreation infrastructure and shall ensure that provision is capable of serving both existing and future residents.

m. Community Centre / Sports Hall

Provision for a publicly accessible community centre/sports hall of not less than approximately 1,500sqm, unless an alternative provision of equal or greater community benefit is justified by the Social Infrastructure Audit and agreed with the Planning Authority.

The facility shall be delivered in tandem with residential development and shall be operational prior to occupation of a defined proportion of dwellings, to be agreed through the masterplan.

The masterplan shall identify the facility's location, specification, delivery mechanism, management arrangements, public accessibility and relationship with wider sports, youth and community infrastructure.

n. Community Safety and Policing Infrastructure

Assessment of community safety and policing infrastructure needs arising from the proposed development and wider population growth, including consultation with An Garda Síochána where appropriate.

The masterplan shall identify how safe design, passive surveillance, active travel safety, lighting, public realm management and community safety considerations will be incorporated into the development.

o. Public Open Space and Recreation Strategy

A Public Open Space and Recreation Strategy identifying the quantity, quality, function and accessibility of open space to serve both existing and future residents.

The strategy shall ensure an appropriate balance of passive and active amenity, biodiversity protection, climate resilience, play provision, youth recreation and universal accessibility.

p. Phasing and Implementation Programme

A phasing and implementation programme identifying the timing, delivery responsibility and funding/delivery mechanism for all required infrastructure.

Residential occupation shall be linked to the timely delivery of supporting infrastructure and services, including education, water, wastewater, transport, active travel, community facilities, sports and recreation infrastructure.

The phasing programme shall identify clear trigger points for delivery of key infrastructure, including the active travel link and community centre/sports hall.

q. Monitoring and Review

A monitoring and review framework to ensure that infrastructure delivery keeps pace with residential occupation and population growth.

The framework shall provide for review at agreed development milestones and shall allow additional mitigation or infrastructure measures to be identified where required.



6.3 Alternative Short-Form Wording

If the Planning Authority does not consider it appropriate to incorporate the full wording above, SCC respectfully requests that, at minimum, MA5.1 be amended to include the following additional paragraph:

The masterplan shall include a Social Infrastructure Audit, Education Capacity Assessment prepared in consultation with the Department of Education and Youth, water and wastewater infrastructure confirmation prepared in consultation with Uisce Éireann, healthcare, childcare, sports and recreation assessment, public open space assessment and a phasing and implementation programme linking residential development to the timely delivery of supporting infrastructure. The proposed community centre/sports hall and active travel link shall be delivered in tandem with residential development and shall be subject to clear delivery triggers agreed through the masterplan.

SCC submits that this shorter wording would still address the principal omissions identified in this submission.

6.4 Rationale for the Proposed Wording

The proposed wording is based on the following principles:

1. **Consistency**
Comparable strategic development areas within Proposed Variation No. 2 include safeguards relating to education, water/wastewater, Social Infrastructure Audits, open space, recreation and phasing. Citywest should be treated consistently unless a clear planning rationale exists for a different approach.
2. **Sustainable Development**
Housing delivery must be aligned with education, water, wastewater, healthcare, community facilities, recreation, transport and open space.
3. **Certainty**
Clear wording at Development Plan stage gives certainty to residents, developers, service providers, councillors and decision-makers.
4. **Deliverability**
The wording does not prevent development. It ensures that development proceeds in a planned and phased manner.
5. **Public Confidence**
Clear infrastructure safeguards would help restore public confidence that growth in Citywest will be supported by necessary services and facilities.

6.5 SCC 's Preferred Outcome

SCC 's preferred outcome is that the Council adopts strengthened wording for MA5.1 that includes all of the following:

- Social Infrastructure Audit.
- Education Capacity Assessment.



- Department of Education and Youth consultation.
- Uisce Éireann consultation.
- Potable water and wastewater capacity confirmation.
- Healthcare assessment.
- Childcare and youth infrastructure assessment.
- Sports and Recreation Infrastructure Assessment.
- Public Open Space and Recreation Strategy.
- Clear delivery trigger for the community centre/sports hall.
- Early delivery trigger for the active travel link.
- Infrastructure phasing and implementation programme.
- Monitoring and review framework.

SCC respectfully submits that these amendments would make MA5.1 more robust, transparent and consistent with the Council's own approach to other major development areas within the Proposed Material Alterations.

6.6 Conclusion

SCC welcomes the improvements already proposed through MA5.1.

However, the current wording remains incomplete because it does not provide a sufficiently comprehensive infrastructure framework for one of the most significant residential growth areas in the county.

The revised wording proposed in this chapter would not prevent housing delivery. It would support housing delivery by ensuring that development is accompanied by the infrastructure, services and community facilities necessary to create a sustainable and well-served community.

SCC respectfully requests that South Dublin County Council adopt the proposed revised wording, or equivalent wording, before making the final Material Alteration.



Conclusions

7.1 Overall Position of SCC

Saggart Community Council welcomes the opportunity to make this submission on the **Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028**, with particular reference to **Material Alteration MA5.1 – Citywest**.

SCC acknowledges the urgent need to increase housing supply and recognises that the Council must plan for future residential growth in accordance with national and regional policy. This submission does not seek to prevent housing delivery.

Rather, it seeks to ensure that housing growth at Citywest is supported by the infrastructure, services, environmental safeguards and community facilities necessary to create a sustainable and well-served community.

SCC also acknowledges that MA5.1 contains positive amendments.

In particular, SCC welcomes the proposed requirements for Ecological Impact Assessment, ecologically informed lighting design, Transport and Traffic Assessment, active travel connectivity, site-specific Flood Risk Assessment, assessment of existing water features and provision for a community centre/sports hall. These additions are important improvements and should be retained.

However, the amendments do not yet provide a complete or sufficiently robust strategic infrastructure framework for a major residential development at Citywest.

7.2 Central Concern

The central concern raised throughout this submission is one of **consistency**.

The Material Alterations show that South Dublin County Council has applied detailed strategic safeguards to several other major development areas.

These include requirements for Social Infrastructure Audits, educational capacity assessment, consultation with the Department of Education and Youth, infrastructure master planning, water and wastewater network assessment, Uisce Éireann agreement, public open space audits, sports and recreation assessment and infrastructure phasing.

Equivalent safeguards have not been included for Citywest.

SCC respectfully submits that this difference in approach requires either:

1. clear planning justification; or
2. amendment of MA5.1 to include equivalent safeguards.

At present, the published documentation does not appear to provide an evidence-based rationale explaining why Citywest should proceed under a narrower strategic framework than comparable major development areas elsewhere within the same Proposed Variation.



7.3 Infrastructure Must Keep Pace with Housing

SCC's position is that housing delivery and infrastructure delivery must be planned together.

Additional residential development will increase demand for:

- primary and post-primary school places;
- childcare;
- healthcare and primary care services;
- sports and recreation facilities;
- community meeting space;
- youth facilities;
- potable water supply;
- wastewater capacity;
- public transport;
- active travel links;
- safe public open space;
- community safety supports.

If these matters are not properly addressed at Development Plan and masterplan stage, there is a real risk that existing and future residents will experience further pressure on already stretched services.

This is not a reason to prevent housing.

It is a reason to plan housing properly.

7.4 SEA and AA Screening

SCC notes the Council's determination that Strategic Environmental Assessment and Appropriate Assessment are not required in respect of the proposed Material Alterations. SCC also notes that the SEA Screening concludes that the proposed changes do not generate new or alternative land-use effects beyond those already assessed, and that future projects will remain subject to appropriate lower-tier planning and environmental assessment procedures.

SCC does not seek to make a technical ecological objection to the AA Screening Determination in the absence of expert ecological evidence.

However, SCC respectfully submits that the SEA Screening reasoning should be clarified in respect of Citywest, particularly regarding cumulative impacts on education, healthcare, community infrastructure, recreation, potable water, wastewater and transport.

These issues are central to sustainable development and should be expressly addressed before the final Material Alteration is made.

SCC also requests that the Council ensure the AA Screening remains valid for any final amended wording adopted for MA5.1.



7.5 Requested Outcome

SCC respectfully requests that South Dublin County Council amend **MA5.1 / CS8 SLO2** to include, at minimum, the following additional safeguards:

1. A Social Infrastructure Audit.
2. An Education Capacity Assessment prepared in consultation with the Department of Education and Youth.
3. Confirmation of potable water supply, water pressure, wastewater network capacity and wastewater treatment capacity in consultation with Uisce Éireann.
4. A healthcare infrastructure assessment.
5. A childcare and youth infrastructure assessment.
6. A Sports and Recreation Infrastructure Assessment.
7. A Public Open Space and Recreation Strategy.
8. Clear delivery triggers for the proposed community centre/sports hall.
9. Early delivery of the active travel link between Mill Road and Garter Lane.
10. A phasing and implementation programme linking residential occupation to delivery of necessary supporting infrastructure.
11. Monitoring and review mechanisms to ensure infrastructure delivery keeps pace with population growth.

SCC has provided both detailed and short-form proposed wording in Chapter 6 to assist the Planning Authority and elected members in incorporating these safeguards into the final Variation.

7.6 Constructive Nature of the Submission

This submission is made in a constructive spirit.

SCC is not seeking special treatment for Citywest.

SCC is seeking the **consistent application of the Council's own planning approach** across comparable major residential growth areas.

Where the Council has already determined that safeguards such as education assessments, Social Infrastructure Audits, utility capacity confirmation, sports/recreation assessments and infrastructure phasing are appropriate elsewhere, SCC respectfully submits that equivalent safeguards should be applied to Citywest.

This would improve transparency, strengthen public confidence and support the delivery of housing in a way that is properly planned, evidence-based and sustainable.

7.7 Final Request

SCC respectfully requests that South Dublin County Council:

- take this submission into account before making the final Material Alterations;
- amend MA5.1 to include the strategic infrastructure safeguards identified in this submission;

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- clarify the SEA Screening reasoning in respect of cumulative infrastructure impacts;
- ensure any final adopted wording is reviewed for consistency with the AA Screening Determination;
- apply comparable planning safeguards consistently across major residential growth areas within Proposed Variation No. 2.

SCC believes that these amendments would strengthen the Development Plan, support sustainable housing delivery and help ensure that Citywest develops as a balanced, well-served and resilient community.

SCC respectfully asks the Council and elected members to adopt the strengthened wording proposed in this submission, or equivalent wording, before making the final Material Alteration.



Appendices

Appendix A – Comparison Matrix of Strategic Safeguards Across Material Alterations

A.1

This appendix summarises the strategic safeguards applied to selected Material Alterations within Proposed Variation No. 2 and compares those safeguards with the wording proposed for **MA5.1 – Citywest**.

The purpose of this appendix is to demonstrate that the request made by SCC is not exceptional or unusual. The safeguards sought for Citywest are already reflected in whole or in part elsewhere within the Proposed Material Alterations.

A.2 Comparative Matrix

Safeguard / Requirement	Adamstown SDZ West MA2.1	Tubber Lane North MA4.1	Liffey Valley MA16.1	Ballynakelly MA1.1	Knockmeena MA9.1	Haughan's Field MA65.1	Citywest MA5.1
Masterplan before planning application	Yes	Yes	Yes / future masterplan context	Yes	Phasing and delivery plan	Masterplan before development	Yes
Social Infrastructure Audit	Yes	Yes	Partial community/public realm focus	No express SIA	No express SIA	No express SIA	No
Education capacity assessment	Yes	Yes	Yes	Secondary school site reservation	No express requirement	No express requirement	No
Department of Education consultation	Yes	Yes	Yes	Yes	No express requirement	No express requirement	No
Water/waste water capacity assessment	Yes	Yes	No express equivalent	No express equivalent	No express equivalent	No express equivalent	No

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Safeguard / Requirement	Adamstown SDZ West MA2.1	Tubber Lane North MA4.1	Liffey Valley MA16.1	Ballynakelly MA1.1	Knockmeena MA9.1	Haughan's Field MA65.1	Citywest MA5.1
Uisce Éireann agreement	Yes	Yes	No express equivalent	No express equivalent	No express equivalent	No express equivalent	No
Public open space audit	Yes	Yes	Public realm/open space emphasis	Public park delivery	No express audit	No express audit	No
Sports/recreation assessment	Public open space/recreation audit	Public open space/recreation audit	Community centre provision	Sports/community space considered	All-weather pitch investigation	Sports centre/facility, pitch, clubhouse and training pitches	Limited to community centre/sports hall
Healthcare assessment	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No
Garda/community safety infrastructure assessment	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No express requirement	No
Public transport delivery trigger	Yes	Yes	No express trigger	No express trigger	Transport/movement plan	No express trigger	No
Infrastructure phasing	Yes	Yes	Partial	Public park in tandem/prior to development	Yes	No development until masterpl	Limited / unclear

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Safeguard / Requirement	Adamstown SDZ West MA2.1	Tubber Lane North MA4.1	Liffey Valley MA16.1	Ballynakelly MA1.1	Knockmeena MA9.1	Haughan's Field MA65.1	Citywest MA5.1
						an agreed	
Active travel	Future access connections	Access to high-capacity public transport	Active travel/public realm emphasis	Active travel connections	Transport/movement plan	No express equivalent	Active travel link only
Community facility delivery	Indirect through audit	Indirect through audit	Multi-purpose community centre	Sports/community space considered	Sports facility investigation	Sports centre/facility	Community centre/sports hall, but no clear delivery trigger

A.3 Summary of Findings

The comparison shows that Citywest has been assigned important environmental and mobility safeguards, particularly relating to ecology, lighting, flood risk, surface water and active travel. These are welcomed.

However, when compared with other major growth areas, MA5.1 does not currently include equivalent safeguards for:

1. Social Infrastructure Audit.
2. Educational capacity.
3. Department of Education consultation.
4. Water and wastewater capacity.
5. Uisce Éireann agreement.
6. Public open space audit.
7. Sports and recreation assessment.
8. Healthcare assessment.
9. Childcare/youth infrastructure.
10. Infrastructure phasing.
11. Community facility delivery trigger.
12. Monitoring and review.

SCC submits that MA5.1 should be amended to correct this inconsistency.



Appendix B – Source Extracts from Proposed Material Alterations

B.1

This appendix identifies the key extracts from the Proposed Material Alterations relied upon by SCC .

B.2 Extract 1 – MA5.1 Citywest

Issue: Current wording of CS8 SLO2.

Key matters included in MA5.1:

- Ecological Impact Assessment.
- Ecologically informed lighting design.
- Transport and Traffic Assessment.
- Active travel link between Mill Road and Garter Lane.
- Site-specific Flood Risk Assessment.
- Analysis of existing water features.
- Community centre/sports hall of approximately 1,500sqm.

Relevance:

This extract shows what is currently proposed for Citywest and highlights the absence of equivalent education, utility, social infrastructure, healthcare, childcare, sports/recreation and phasing safeguards.

B.3 Extract 2 – MA2.1 Adamstown SDZ West

Issue: Strategic safeguards applied elsewhere.

Key matters included:

- No significant residential development until DART+ Southwest or equivalent rail service is operational.
- Infrastructure masterplan addressing water and wastewater upgrades.
- Requirement to demonstrate surrounding zoned lands, including Clonburris SDZ, are not compromised.
- Agreement with Uisce Éireann before planning application.
- Social Infrastructure Audit.
- Transport and Traffic Assessment.
- Public Open Space Audit.
- Educational capacity in consultation with the Department of Education and Youth.

**Relevance:**

This extract demonstrates that the Council has applied a robust infrastructure framework elsewhere within the same Variation.

B.4 Extract 3 – MA4.1 Tubber Lane North

Issue: Strategic phasing, utilities and social infrastructure.

Key matters included:

- Commencement linked to DART+ Southwest or equivalent rail service.
- Commencement linked to Tobermaclugg Park.
- Infrastructure masterplan addressing water and wastewater upgrades.
- Uisce Éireann agreement.
- Social Infrastructure Audit.
- Public Open Space Audit.
- Educational capacity in consultation with the Department of Education and Youth.
- Transport and Traffic Assessment informed by deliverable transport options.

Relevance:

This extract is directly relevant because it shows how the Council has combined infrastructure assessment, phasing and service-provider engagement for another major residential growth area.

B.5 Extract 4 – MA16.1 Liffey Valley MRC

Issue: Education and community infrastructure.

Key matters included:

- Requirement to have regard to Department of Education and Youth requirements.
- Planning application to be accompanied by evidence of sufficient primary and secondary school capacity in the wider area.
- Community facilities.
- Public open space and high-quality public realm.
- Multi-purpose community centre unless otherwise agreed by the Planning Authority.

Relevance:

This extract supports SCC's request for a similar education capacity requirement at Citywest.

B.6 Extract 5 – MA1.1 Ballynakelly, Newcastle

Issue: Early delivery of community infrastructure.

Key matters included:

- Public park of minimum 2 hectares to be delivered in tandem with, or prior to, development.



- Reservation of secondary school site unless otherwise agreed having regard to Department of Education and Youth requirements.
- Active travel connections.
- Existing unfinished structure to be considered for sports/community use in an early phase.

Relevance:

This extract supports SCC's request that the Citywest community centre/sports hall and active travel link should have clear delivery triggers.

B.7 Extract 6 – MA9.1 Knockmeenagh Framework Site

Issue: Phasing and sports infrastructure.

Key matters included:

- Phasing and delivery plan.
- Evidence-based investigation of potential delivery of an all-weather pitch.
- Transport and movement plan.
- Liaison with TII, NTA and landowners.

Relevance:

This extract supports SCC's request for a sports and recreation assessment and a phasing/delivery plan for Citywest.

B.8 Extract 7 – MA65.1 Haughan's Field, Cornerpark

Issue: Sports centre/facility delivery.

Key matters included:

- No development to commence until a masterplan has been agreed.
- Masterplan to show how approximately 2 hectares maximum of land will be integrated into housing development to deliver a sports centre/facility, including pitch, clubhouse and training pitches.

Relevance:

This extract supports SCC's request that Citywest should include more robust sports and recreation infrastructure assessment and delivery mechanisms.



Appendix C - Education

SCC has obtained records regarding Department of Education response under FOI reference DES-FOI-2026-0107. The request specifically concerned projected demand for primary and post-primary school places, enrolment pressure, capacity constraints, additional school provision and correspondence with South Dublin County Council concerning Citywest, Saggart and Rathcoole.

The records released show that school capacity in the wider Newcastle/Rathcoole/Saggart/Citywest area is already the subject of detailed Departmental analysis. The records include demand analyses, school planning area assessments, accommodation planning, temporary/interim accommodation records and correspondence with South Dublin County Council.

In particular, the Department's records identify significant population growth in Saggart, substantial projected school-going population growth across Newcastle/Rathcoole/Saggart/Citywest, and projected post-primary demand exceeding capacity over a number of years. They also show that future capacity depends on the delivery of school projects and interim/phased accommodation arrangements.

SCC respectfully submits that this evidence reinforces the need for MA5.1 to include an express Education Capacity Assessment, prepared in consultation with the Department of Education and Youth, before residential development proceeds on the Citywest lands.



Appendix D – Water and Wastewater Evidence

SCC notes that Uisce Éireann's public capacity registers do not provide a site-specific confirmation that water and wastewater network capacity is available for the Citywest lands. Uisce Éireann expressly states that its capacity registers are intended to inform forward planning but cannot be taken as confirmation that capacity is available for a particular development and do not provide an indication of network capacity.

The Dublin Water Supply Capacity Register identifies Saggart, Rathcoole and Newcastle within the Greater Dublin Area Water Resource Zone as "Potential Capacity Available – LoS improvement required", a category which Uisce Éireann defines as meaning that capacity constraints exist, and that additional analysis of pre-connection enquiries and connection applications may be required.

In relation to wastewater, while the Dublin Wastewater Treatment Capacity Register identifies Ringsend WWTP as having treatment capacity for Saggart, Rathcoole and Newcastle, Uisce Éireann also states that its wastewater register does not provide an indication of network capacity and that network upgrades may be required to support new development.

SCC further notes that Uisce Éireann has advised the Planning Authority that the 9B sewer is the main strategic foul sewer serving a significant part of South Dublin and that there are known constraints and issues with this sewer, with a Drainage Area Plan and feasibility/concept design process ongoing.

In these circumstances, SCC submits that local evidence of water pressure concerns, combined with the scale of proposed residential growth, supports the inclusion of a specific requirement in MA5.1 for confirmation of potable water and wastewater capacity in consultation with Uisce Éireann.

This would be consistent with the approach applied to Adamstown SDZ West and Tubber Lane North, where water and wastewater infrastructure master planning and Uisce Éireann agreement are expressly required.



Appendix E – Community, Sports and Recreation Evidence

SCC /SCC has previously raised detailed concerns regarding the lack of adequate community, sports and recreation infrastructure in the Citywest/Saggart area, including the shortage of playing pitches, all-weather facilities, indoor sports space, youth facilities and accessible community meeting space.

These concerns are supported by resident consultation responses, local community evidence and the Chief Executive's Report, which records submissions referring to the absence of facilities such as a swimming pool, library, multi-purpose sports facility, adequate civic space and places for children and teenagers to socialise.

While MA5.1 now includes welcome provision for a community centre/sports hall, SCC submits that this should not be treated as a complete response to the wider deficit.

A broader Sports, Recreation and Community Infrastructure Assessment is required to identify existing shortfalls, future demand, delivery mechanisms and phasing, and to ensure that facilities are delivered alongside residential development rather than deferred to a later stage.

Other Material Alterations refer to sports/community space, all-weather pitch investigation, sports centre/facility provision and recreation infrastructure. Citywest should be subject to an equivalent evidence-based assessment.



Appendix F – Healthcare, Childcare and Youth Infrastructure Evidence

These issues are central to sustainable community development and should be assessed through a Social Infrastructure Audit.

SCC /SCC has previously raised concerns that healthcare, childcare, after-school care, youth services and community safety infrastructure have not kept pace with population growth in the Citywest/Saggart area.

These issues are directly relevant to MA5.1 because additional residential development will increase demand on already pressured local services.

SCC therefore submits that healthcare, childcare, after-school care, youth facilities and community safety should be assessed as part of a Social Infrastructure Audit at masterplan stage, with clear delivery mechanisms and phasing identified before residential development proceeds.



Appendix G – SEA and AA Screening Extracts

The SEA Screening Report concludes that the proposed material alterations are “minor in scale, type and location” and that they do not generate significant environmental or land-use effects beyond those already assessed. It also states that no cumulative effects are identified. SCC respectfully submits that, in respect of MA5.1 Citywest, this reasoning should be expanded. The published assessment does not appear to explain how cumulative infrastructure impacts relating to education, healthcare, childcare, sports and recreation, community facilities, potable water supply, wastewater network capacity and wider population growth across Citywest, Saggart and Rathcoole were assessed before reaching that conclusion.

SCC also requests that the Council confirm that any final amendments made to MA5.1 following this consultation are reviewed against the SEA and AA Screening conclusions before adoption.



Appendix H – Previous Submissions and Chief Executive Response

H.1

This appendix records key extracts from previous SCC /community submission material and the Chief Executive's Report on Proposed Variation No. 2.

The purpose is to demonstrate that the issues now raised in relation to Material Alteration MA5.1 – Citywest are not new. Concerns regarding education, healthcare, wastewater, water pressure, transport, recreation, community facilities, youth infrastructure, cumulative growth and phasing were raised during the earlier consultation stage and remain directly relevant to whether MA5.1 is adequate.

SCC submits that MA5.1 responds positively to some issues, particularly ecology, lighting, flood risk, active travel and provision for a community centre/sports hall. However, MA5.1 does not yet include the wider strategic infrastructure safeguards requested in previous submissions and now sought again in this submission.

H.2 Previous SCC / Community Submission Extracts

Infrastructure-led planning

The previous planning response stated:

“The proposed rezoning is premature, unsustainable, and contrary to proper planning and sustainable development. It conflicts with infrastructure-led growth principles.”

It further stated that the planning test included:

“Infrastructure capacity and deliverability within realistic plan periods.”

Relevance to MA5.1:

This supports SCC's current request that MA5.1 include clear infrastructure phasing and delivery mechanisms before residential development proceeds.

Community survey and infrastructure concerns

The previous response recorded the SCC January 2026 survey results as follows:

“SCC January 2026 survey (n = 786) headline results: 96% oppose rezoning of the golf course lands; 92% believe the area is already overdeveloped; 96% believe the road network cannot support further housing.”

It also recorded consistent concerns regarding:

“traffic and transport, school places, GP shortages, flooding risk, and loss of green space.”



Relevance to MA5.1:

This demonstrates that residents had already identified the same infrastructure issues now being raised. MA5.1 should therefore include Social Infrastructure Audit, Education Capacity Assessment, healthcare assessment, transport phasing and water/wastewater safeguards.

Education capacity

The previous response stated:

“Local schools are at or beyond capacity with substantial waitlists.”

It further stated:

“Rezoning before delivery of additional primary and post-primary capacity would force longer commutes and undermine compact growth and safe routes to school aims.”

The planning ask was:

“Defer any rezoning until the Department of Education confirms site-specific education provision, funding and timelines, with conditions for phased occupation tied to delivery.”

Relevance to MA5.1:

MA5.1 does not currently require an Education Capacity Assessment or consultation with the Department of Education and Youth. This omission remains directly relevant.

GP and primary care capacity

The previous response stated:

“Primary care in the wider Citywest–Saggart catchment is underserved; residents report difficulty accessing GP lists and timely appointments.”

It also stated:

“No HSE-funded local expansion is confirmed to absorb a step-change in population.”

The planning ask was:

“Require a binding mechanism ... linking any new units to documented GP capacity and/or on-site primary-care accommodation.”

Relevance to MA5.1:

MA5.1 contains no healthcare infrastructure assessment. SCC requests that healthcare and primary care capacity be included in the Social Infrastructure Audit and masterplan requirements.

Transport and traffic

The previous response stated:



“The area exhibits high car dependency.”

It also stated that Luas services are “frequently overcrowded at peaks,” bus services lack reliable frequency and orbital connectivity, and key junctions are congested.

The planning ask was:

“Undertake an Area-Based Transport Assessment and secure up-front delivery of public-transport and active-travel infrastructure prior to zoning.”

Relevance to MA5.1:

MA5.1 includes a Transport and Traffic Assessment and an active travel link, which is welcomed. However, it should be strengthened to require cumulative assessment, mitigation delivery and early active travel delivery.

Cumulative growth pressure

The previous response stated:

“Across Citywest, Saggart, Rathcoole and Newcastle, there is a large consented and pipeline housing volume. Social infrastructure and open space have not kept pace.”

The planning ask was:

“Apply the Settlement Capacity Audit findings and demonstrate realistic delivery trajectories for schools, health, open space and transport before further zoning.”

Relevance to MA5.1:

This directly supports SCC’s request for a Social Infrastructure Audit and infrastructure phasing programme.

Fortunestown LAP facilities outstanding

The previous response stated:

“Fortunestown LAP community facilities outstanding: Past permissions envisaged a sports pavilion, pitches, tennis, playground, jogging track and landscaped parkland adjoining Citywest Shopping Centre ... Delivery remains incomplete, intensifying the amenity deficit amid continuing residential growth.”

Relevance to MA5.1:

This is highly relevant to the need for clear delivery triggers. It demonstrates why a general reference to a community centre/sports hall is not enough unless timing, delivery and public access are secured.

Strategic sewer constraint – 9B

The previous response stated:



“The 9B Strategic Sewer Drainage Area serving Citywest–Saggart lacks published, verified headroom for new population loading; key design PE, cumulative PE and spare capacity data remain unconfirmed.”

It also stated:

“Absent verified wastewater headroom, funded school/GP capacity, and delivered community facilities, additional zoning would be premature and contrary to infrastructure-led planning.”

Relevance to MA5.1:

MA5.1 does not currently require Uisce Éireann confirmation of wastewater network capacity. This remains a core omission.

Wastewater and drainage capacity

The previous response stated:

“The 9B Strategic Sewer Drainage Area serves Citywest, Saggart, Rathcoole and may receive loading from other strategic growth areas. It is identified locally as capacity-sensitive and therefore a critical constraint on additional zoning.”

It listed current issues including:

“No published confirmation of the design Population Equivalent (PE), current cumulative loading (PE), or proven spare capacity.”

It also identified risks including:

“Hydraulic surcharge and sewer flooding in storm events” and “Non-compliance with Irish Water connection criteria.”

Relevance to MA5.1:

This supports the requested amendment requiring Uisce Éireann confirmation of potable water, water pressure, wastewater network capacity and wastewater treatment capacity before development proceeds.

Social and youth wellbeing

The previous response stated:

“Residents report an urgent need for multi-sport pitches, indoor courts, swimming provision, a youth centre, skate facilities and inclusive play.”

The planning ask was:

“Reserve and zone the lands for a community and recreation campus with a phased delivery schedule.”



Relevance to MA5.1:

MA5.1 includes a community centre/sports hall, but no wider Sports and Recreation Infrastructure Assessment and no phased delivery schedule.

Environmental and biodiversity concerns

The previous response stated:

“The lands form part of a high-value ecological network that includes protected bat species and the Camac River corridor.”

It also stated that the site contains:

“mature treelines, hedgerows and woodland edges supporting roosting, foraging and commuting routes for bats.”

Relevance to MA5.1:

MA5.1 now includes Ecological Impact Assessment and ecologically informed lighting design. SCC welcomes this, but requests that the EclA and lighting strategy be prepared at masterplan stage and inform layout, phasing and biodiversity protection.

Community, environmental and recreational use

The previous response stated:

“There is a strong mandate for non-residential, community-serving uses,” including “multi-sport and recreation campus,” “public park and biodiversity zones,” “youth centre and wellbeing hub,” and walking and cycling links.

Relevance to MA5.1:

This shows that previous submissions requested a broader community and recreation framework than the single community centre/sports hall now included in MA5.1.

H.3 Chief Executive’s Report Extracts

Community and social facilities concerns

The Chief Executive’s Report records that submissions raised concerns 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.”

It also records that submissions requested future development to have regard to:

“the existing amenity and recreational uses of the immediate and wider area.”

Relevance to MA5.1:

This supports the request for Social Infrastructure Audit, childcare assessment, youth infrastructure assessment and sports/recreation assessment.



Community/sports facility recommended in response

The Chief Executive's Report states that, following consideration of submissions, it was 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."

It further states that this would require sufficient space for:

"a building of approximately 1500sq m."

Relevance to MA5.1:

SCC welcomes this response. However, it does not address timing, delivery trigger, management, public access or whether the facility is sufficient to meet wider sports/recreation needs.

Existing community and youth deficits

The Chief Executive's Report records submissions stating that there is:

"No swimming pool, cinema, library or multi-purpose sports facility and no adequate meeting places or shared civic spaces."

It also records that:

"Children and teenagers have nowhere to socialise," and that an SVRA survey identified safety and policing as one of the strongest concerns raised by residents at 79%.

Relevance to MA5.1:

This supports the request for a Social Infrastructure Audit, youth infrastructure assessment, Sports and Recreation Infrastructure Assessment and community safety assessment.

Fortunestown LAP facilities outstanding

The Chief Executive's Report records that:

"The Fortunestown LAP community facilities remain outstanding, intensifying the amenity deficit."

It also records that past permissions envisaged:

"a sports pavilion, pitches, tennis, playground, jogging track and landscaped parkland adjoining Citywest Shopping Centre."

Relevance to MA5.1:

This is very strong support for requiring clear delivery triggers. It shows that the community has experienced promised facilities not being delivered.



Schools already raised

The Chief Executive's Report records that:

"A number of submissions state that schools are already under pressure and further large-scale... residential development would worsen pressure.

Relevance to MA5.1:

MA5.1 does not currently require an Education Capacity Assessment or Department of Education consultation, even though education pressure was raised before.

Existing road congestion acknowledged

The Chief Executive's Report acknowledges that:

"the existing road network in the Saggart / Rathcoole / Citywest area experiences peak hour congestion."

It states that the Transport and Traffic Assessment requirement provides a mechanism to assess cumulative impacts and secure mitigation measures.

Relevance to MA5.1:

SCC welcomes the TTA requirement, but requests wording requiring delivery of mitigation and phasing, rather than assessment alone.

Infrastructure-first and phased development acknowledged

The Chief Executive's Report states:

"The Planning Authority acknowledges various submissions emphasis on infrastructure-first and phased development."

Relevance to MA5.1:

This is highly relevant. It supports request for a phasing and implementation programme linking residential occupation to infrastructure delivery.

Uisce Éireann and 9B sewer

The Chief Executive's Report records a submission from Uisce Éireann stating:

"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."

Uisce Éireann also stated:

"In the interim, separation of storm water, removal of infiltration, misconnections and SUDs solutions must be looked at."



Relevance to MA5.1:

This is one of the strongest CE Report extracts. It directly supports requiring Uisce Éireann confirmation and network capacity assessment in MA5.1.

Uisce Éireann local upgrades / 9B upgrade likely

For Belgard Road, the Chief Executive's Report records Uisce Éireann comments that there is a:

"Significant trunk watermain network bounding the site. Local upgrades required" and "Sewer network: Substantial upgrades likely (9B Sewer Upgrade)."

Relevance to MA5.1:

Although this specific comment was made for Belgard Road, it reinforces the strategic nature of the 9B sewer issue across South Dublin and supports inclusion of a Uisce Éireann confirmation requirement for Citywest.

Equivalent safeguards applied elsewhere

For Finnstown Castle, the Chief Executive's Report states that an infrastructure masterplan must address:

"water supply and wastewater network upgrades necessary to serve the subject lands," and "must be agreed in advance with Uisce Éireann."

It also states:

"Development cannot proceed unless Irish Water confirms that adequate and sustainable servicing arrangements are available."

Relevance to MA5.1:

If this safeguard is required elsewhere, equivalent wording should be included for Citywest.

H.5 Conclusion

The previous submissions and the Chief Executive's Report show that the Council was clearly on notice of concerns regarding infrastructure, education, healthcare, childcare, youth facilities, sports and recreation, water and wastewater, transport, cumulative growth and phasing before MA5.1 was prepared.

MA5.1 responds positively to some concerns but does not fully resolve them.

SCC therefore respectfully submits that the current consultation provides an opportunity to strengthen MA5.1 by incorporating the specific strategic safeguards requested in this submission.

These safeguards would not prevent housing delivery. They would ensure that any housing delivered at Citywest is supported by the infrastructure and services required to create a sustainable community.

SAGGART COMMUNITY COUNCIL

