



ASSOCIATES

23rd July 2026.

Variation No. 2,
Senior Executive Officer,
Forward Planning Section,
Planning & Transport Department,
South Dublin County Council,
County Hall, Tallaght,
Dublin 24, D24 A3XC.

Re:

**MATERIAL ALTERATIONS to PROPOSED VARIATION NO. 2
COUNTY DEVELOPMENT PLAN, 2022-2028**

Lands at Finnstown Castle, Lucan, Co. Dublin.

Dear Sir / Madam,

We act on behalf of Maplewood Residential, of Moritz House, Old Court Centre, Firhouse, Dublin 24, who are the owners of land in Finnstown, Lucan.

We make this submission in relation to the recently published Material Alterations to the Proposed Variation No. 2 to the South Dublin County Development Plan, 2022-2028 that are currently on public display.

We note that under said Proposed Variation that our client's lands at Finnstown Castle which were initially proposed to be zoned from existing land use objective OS "Open Space" to proposed use "RES – Existing Residential" under Amendment Ref. No. 3, is now subject to Material Amendment Ref. No. 3 which proposes to omit Amendment Ref. No. 3 thus effectively not proposing to zone the lands.

We have serious concerns regarding the current proposed Material Alteration (MA3.1) and request that the Planning Authority judiciously reconsiders the rezoning of our client's lands in Finnstown. We request that the subject lands be zoned from existing land use objective OS "Open Space" to proposed use "RES – Existing Residential" upon the adoption of the Proposed Variation No. 2 to the South Dublin County Development Plan, 2022-2028.



1.0 Location & Description

- 1.1. Maplewood Residential is the owner of c.10 hectares of land at Finnstown in Lucan. Bounding the subject site to the immediate south-west is the Finnstown House Hotel and grounds, which are in separate / third-party ownership. To the immediate north is the low-density development of Finnstown Fairways, while to the north and west is the Adamstown Strategic Development Zone (SDZ). The lands have direct access onto the R120 Newcastle / Lock Road.
- 1.2. Our client's lands are in greenfield condition, with no buildings/structures on them and are relatively flat, with the highest point being at c.60mOD in the south-western corner of the site. The level adjacent to the Newcastle Road is c.56mOD and the low point of the site, c.55mOD, is located in the top northern corner of the site adjacent to Old Tandy's Lane. There are no topographical issues in developing this site, nor any known environmental sensitivities that would preclude housing form being delivered on the site.

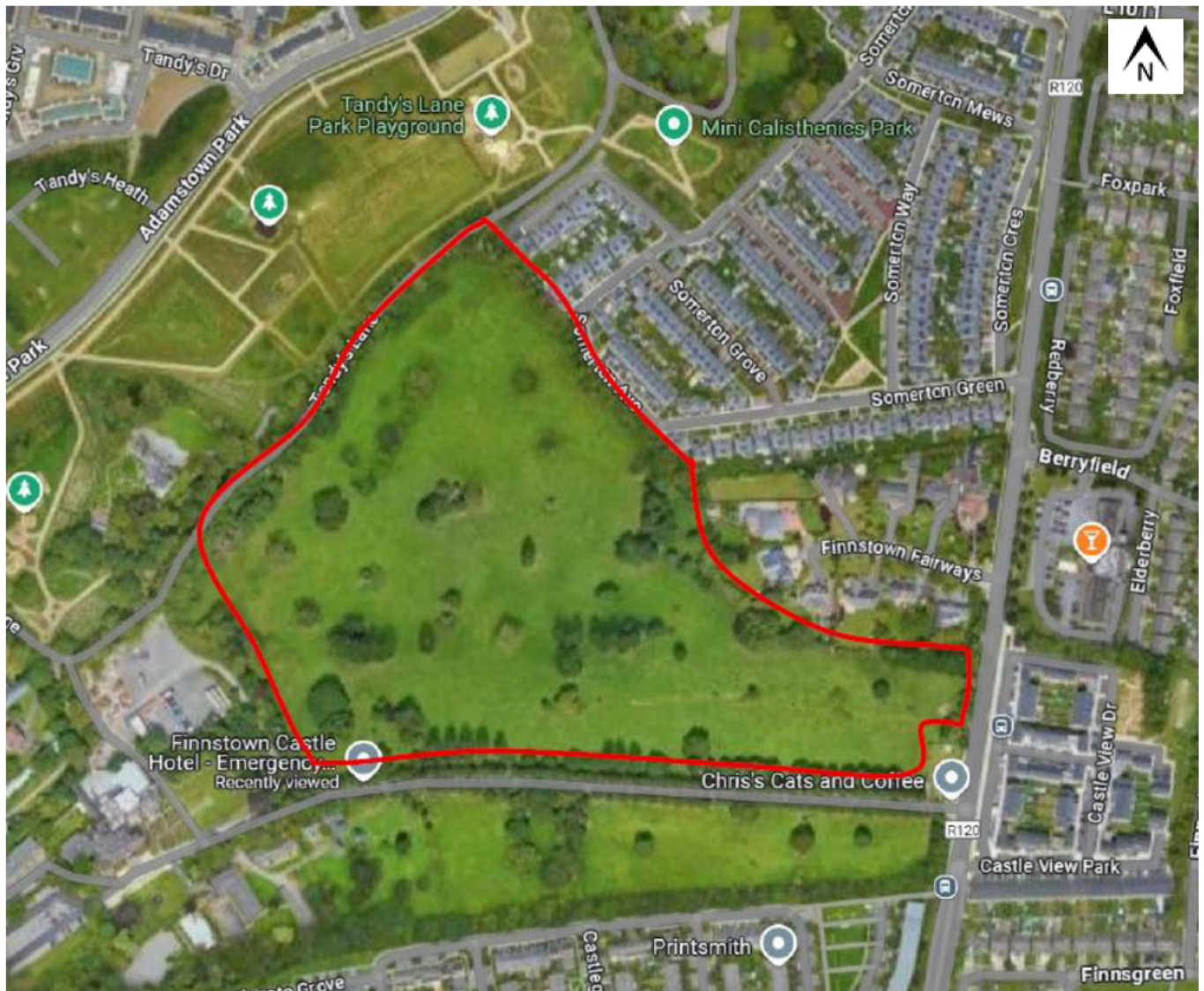


Fig. 1: Subject lands indicatively outlined in red (Source: Google Maps)



2.0 Planning & Locational Context

- 2.1** Our client's lands are currently zoned Objective OS: *"To preserve and provide for open space and recreational amenities"* in the current South Dublin County Development Plan, 2022-2028 (hereafter "CDP"). However, it should be noted that these lands are in private ownership and are currently in agricultural use, being grazed by cattle. The site is not accessible to or used by the public as recreational open space and is therefore of no benefit to residents in the area, nor does the current use of the site comply with the spirit of the current open space zoning objective attached to it. The private ownership of these lands for many years has resulted in it never being used for open space or recreational use by the public. In addition, there are no long-term plans to make this land available for use as open space, and there is no planning history attached to the subject site associating it with open space use. Therefore, it is considered that its current zoning as open space is misleading and not a sustainable land use zoning objective.
- 2.2** Our client's lands are surrounded by land either developed or currently zoned for residential development, save for Finnstown House to the south-west and Tandy's Lane Park to the north-west, which itself forms part of the Adamstown SDZ. The subject site is fully serviceable and has access available onto (i) the R120 Newcastle / Lock Road and (ii) Tandy's Lane. Our client's land is vacant and underutilised in its current format, being located within a long established, built-up suburban area of Dublin, with proximate access to a wide range of local services and facilities and public transport services (both bus and rail). Unless zoned for a more appropriate and sustainable use, this site will remain vacant and unused.
- 2.3** Under the initial Proposed Variation No. 2 to the CDP, the subject site and adjoining lands at Finnstown House were proposed to be rezoned from their current OS land use zoning objective to proposed land use objective "RES – Existing Residential". This proposal was welcomed and considered logical, however, the current Material Alterations now seek to retain the current OS zoning on the lands and omit the previous proposal to zone the lands for residential land use, to which we wholly object.
- 2.4** We note that in July 2025, the the Department of Housing, Local Government and Heritage published S.28 Guidelines *"NPF Implementation: Housing Growth Requirements"* which clearly state that *"Given the urgency of the housing crisis, planning authorities should commence the process of revising and varying the development plan against the policies and objectives of these Guidelines as quickly as possible"*, and that the *"housing growth requirement figures for each local authority are provided in the form of an annualised estimated housing figure for two time periods (2025 to 2034 and 2034 to 2040)"*. The Proposed Variation No. 2 to the current CDP is in response to the publication of the aforementioned S.28 Guidelines. We note that under Appendix 1 of these S.28 Guidelines that South Dublin County Council is to target the delivery of 3,270 no. dwellings annually to 2034, and a further 2,414 no. dwellings annually from 2035 to 2040.
- 2.5** We have also examined *"Delivering Homes, Building Communities 2025–2030"* which was published by the Government in November 2025, and this new Plan acknowledges that, there remains a substantial unmet housing need across Ireland. It seeks to accelerate the delivery of new homes, with a target of delivering 300,000 additional homes by the end of 2030. To ensure the zoning of sufficient land for 300,000 homes, the Government published the *First Revision to the National Planning Framework* and directed Local Authorities to update their housing growth requirements, so their development plans reflect the homes now needed, hence the rationale for the subject Proposed Variation No. 2 to the CDP. This new plan *"Delivering Homes, Building Communities"* aims to build on this recent progress to further accelerate the delivery of new homes, to deliver 300,000 by the end of 2030 and follows a new



strategy in terms of delivering homes and building communities and that strategy takes the form of two encompassing Pillars: Pillar 1: Activating Supply and Pillar 2: Supporting People.

Pillar 1: Activating Supply

Pillar 1 focuses on activating the supply of 300,000 homes. This will be achieved through activating more land, providing more housing-related infrastructure, securing more development finance for home building, addressing viability challenges particularly those seen in apartment delivery, increasing the adoption of Modern Methods of Construction, increasing the skills in the residential construction sector and working toward ending dereliction and vacancy.

Pillar 2: Supporting People

Pillar 2 details how Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life. In partnership with local authorities, the LDA and AHBs, the Plan will address the needs of the most vulnerable in our communities, make buying and renting homes more affordable and support the development of villages, towns and cities across the country.

Under each pillar, *Delivering Homes, Building Communities* details four key priorities to activate supply and support people:

To activate the supply of 300,000 homes, Government will:

- *Ensure a strong pipeline of zoned and serviced land is available.*
- *Create the conditions to attract the required investment.*
- *Increase skills and support the adoption of Modern Methods of Construction in the residential construction sector.*
- *Work toward ending dereliction and vacancy.*

To support our people, Government will:

- *Focus on ending homelessness, deliver homes for older people and support social inclusion.*
- *Deliver an average of 12,000 new social homes every year over the lifetime of the Plan.*
- *Promote affordable homeownership, protect renters and make buying and renting homes more affordable.*
- *Invest in the built environment of towns, villages and cities across the country to enhance community well-being.*

2.6. In preparing the Proposed Variation No. 2 to the CDP, we note that the Planning Authority undertook a comprehensive capacity audit, informed by detailed assessment of site constraints, infrastructure availability, accessibility and deliverability. The Planning Authority has confirmed that this process included engagement with key internal departments and relevant infrastructure providers to ensure that lands were assessed in terms of their ability to support sustainable, infrastructure-led development. The sites identified under the Proposed Variation No. 2 were selected on the basis of this evidence-based assessment, having regard

to their proximity to existing and planned infrastructure, their capacity to support appropriate densities, and their alignment with compact growth and transport-oriented development principles and included the subject lands at Finnstown Castle.



Fig. 2: Subject Site outlined in red in the context of the adjoining Adamstown SDZ outlined in yellow and local parks / open spaces

2.7 The surrounding area of Lucan, south of the N4, has been primarily developed for residential purposes over many years, while the neighbouring lands to north and west have been developed as the Adamstown Strategic Development Zone (SDZ) including two major public parks for open space use and recreation i.e. Airlie Park and Tandy's Lane Park which lie on the northern side of Tandy's Lane that abuts the subject site. The development of Adamstown SDZ is much advanced and near completion, providing much needed housing in a variety of housing typologies over the last c.20 years. The realisation of Adamstown as strategic lands catering for new housing with new schools, train station, parks, and local retails services/facilities has come to fruition, as well as significant infrastructural investment including water/wastewater infrastructure and the Celbridge Link Road. Given the near completion of Adamstown SDZ and delivery of physical and social infrastructure there, the subject site remains the only land parcel in this area that can be developed for housing, as all other lands zoned for open space are in active open space / recreational use and there are no other existing residentially zoned lands in the local environs.



2.8 We note that both the Planning Authority and the Office of the Planning Regulator (OPR) supported the proposed rezoning of the subject lands for residential land use. In terms of rezoning the subject lands from current OS zoning to proposed RES zoning we note that South Dublin County Council [SDCC] acknowledges that it has delivered and is continuing to deliver significant community and recreational infrastructure within the wider Lucan area, including the Lucan Leisure Campus and swimming pool, public realm improvements in Lucan Village, the acquisition and opening of Lucan House, the development of Tandy Lane Park, Airlie Park and Central Boulevard Park, and the ongoing expansion of Griffeen Park. In relation to the Proposed Variation No. 2, SDCC stated that *"these investments demonstrate the Council's ongoing commitment to aligning infrastructure provision with population growth. Future zoning, including the lands proposed under this variation, will further inform and support the prioritisation and sequencing of projects within the Council's capital programme, ensuring that investment continues to be directed towards areas experiencing growth and/or deficit"*.

2.9 In light of the foregoing, it is put forward that the subject lands at Finnstown are best placed to cater for new housing in this area. We welcomed the initial proposal to zone these lands for residential land use but are dismayed at the current material alteration to omit such a proposal from the Proposed Variation No. 2 to the CDP, particularly when the rezoning of these lands were selected by the Planning Authority and supported by the OPR. It is respectfully put forward that to not zone the subject lands at this opportune time does not accord with the guidance issued by Government and will not contribute to the delivery of much needed housing. We request that our proposal to zone these lands objective 'RES' be adopted as part of Variation No. 2 to the current CDP as the subject lands can appropriately accommodate future housing that will assimilate into the local environs and replicate the pattern and character of residential development in the area. Taking the aforementioned into consideration, it is evident that the future residential zoning of this site and development of same for new housing will contribute to the achievement of compact growth in Dublin.

2.10 The subject lands are identified in the current South Dublin Development Plan (hereafter "CDP") Core Strategy as being within 'Dublin City & Suburbs', although they directly abut a MASP Residential Growth Area which is the Adamstown SDZ, as per figure 10 Core Strategy Map of the CDP. The proposed zoning of the subject lands would tie in with this and with National Policy Objectives as set out in the 2025 National Planning Framework (NPF), First Revision which is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. A key element of the NPF's strategy is compact growth with one of the key features being *"Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas"*. The NPF sets out a number of objectives that promote coordinated spatial planning and sustainable use of resources and protection of the environment which include *inter alia*:

- **National Policy Objective 7** - *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;*
- **National Policy Objective 8** - *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.*
- **National Policy Objective 12** - *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being;*



- **National Policy Objective 42** - *To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.*
- **National Policy Objective 43** - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

2.11 It is put forward that the proposed zoning of the subject site at Finnstown land use objective "RES" will result in the delivery of an appropriate density of development of modern and adaptable new homes, within an existing urban area, in close proximity to existing local service provision and public transport infrastructure and will consolidate housing development in the environs. We concur with the assertion of the Planning Authority who considered that *"the identification of Finnstown Castle is consistent with a plan-led approach to sustainable urban development, given its location between the Adamstown and Clonburris SDZs, within an established and emerging urban structure. Rather than representing uncontrolled expansion, the zoning reflects the principles of consolidation and sequential development, supporting growth contiguous to existing serviced lands and planned infrastructure utilising transport-oriented development principles"*.

2.12 The subject site occupies an area of c. 10 hectares (Land Registry folio no. DN191669F). In accordance with the 2024 Sustainable Residential Development and Compact Settlements Guidelines, the subject site is located within the Metropolitan Area of Dublin City, and, as per these Guidelines i.e. Table 3.1 of same, the site is considered to be categorised as a "City – Suburban/Urban Extension" site, given its greenfield nature at the edge of the existing built-up area of South Dublin. In accordance with Table 3.1, densities in the range of 40 dph to 80 dph shall be shall generally be applied at suburban and urban extension locations in Dublin. At a minimum this would equate to c.400 units being accommodated on the subject site which is likely to be in the form of a mix of houses, apartments and duplex units, which would be in keeping with the compact forms of residential development that has been delivered in the neighbouring Adamstown SDZ.

2.13 In the preparation of the Proposed Variation No. 2 to the CDP, the Planning Authority has acknowledged that there is an identified shortfall of lands to accommodate c. 2,000 units, and as such, the subject lands were selected for zoning for residential land use to accommodate the necessary, targeted housing figures. Yet, the current status is that the subject lands are proposed to remain zoned for use as open space, despite their private ownership status, no record of having ever been used for open space and recreation, and their proximity to a wide range of local services and facilities.

2.14 Under the Proposed Variation No. 2, our client's lands, along with the adjoining third party lands at Finnstown House were proposed to be zoned for residential land use (objective "RES"). We also note that under the proposed Amendment Ref. No. 3, a specific local objective (SLO) is proposed to be attached to the "Finnstown Castle" lands which contains a number of proposed caveats to developing the lands in the future, including *inter alia*:

- a) *Retention and enhancement of the hedgerow and tree line on the north-western boundary of the site as recorded on 1st Edition OS maps,*
- b) *A Social Infrastructure Audit and provision within development proposals to address any needs identified,*
- c) *A Transport and Traffic Assessment detailing the impact of the proposed development*



- and measures to alleviate its impact,*
- d)** *A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage,*
- e)** *A Public Open Space Audit to inform proposals for public open space and recreational facilities, and*
- f)** *Provision for direct active travel connections from the subject lands into Adamstown SDZ*

We also note that the Planning Authority sought to amend the above wording of the SLO no. CS7 SLO3 to:

“Development on RES zoned lands at Finnstown Castle shall comply with the following:

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

2.15 As experienced house builders, our client is well versed in preparing high quality planning applications and delivering housing schemes. Their design team understands the need to retain trees and hedgerows and various natural heritage items and how to incorporate them into new housing developments. A high quality, sustainable housing development on the subject land will be design led, following the principles of good urban design, married with high quality landscaping and open space provision. In addition, cognizance will be paid to the character and setting of not only the receiving environs but also the Protected Structure to the south-west i.e. Finnstown House. A future planning application will be accompanied by a Social Infrastructure Assessment and Schools Demand Assessment,



as standard. In addition, all necessary drainage and infrastructural requirements will be addressed as standard as part of any future application, including liaison with Uisce Éireann. It is respectfully put forward that our client has no objection to the attachment of the SLO CS7 SLO3 in either format to their lands, upon them being zoned for residential lands use as part of Variation No. 2 to the current CDP.

2.16 In addition to the above, including the need for (i) a Transport and Traffic Assessment (hereafter “TTA”), (ii) travel connections, we also note the proposal to require that *“Development may not commence until Dart+ Southwest or an equivalent rail service has commenced construction or operation, as may be relevant”*. As part of our initial submission to the proposed Variation No. 2 a Transport Statement was prepared and submitted which assessed whether the subject lands are suitable for residential development from a transport and accessibility perspective and which demonstrated that the lands can be accommodated within the existing and planned transport network serving the area.

2.17 The Transport Statement noted that the subject lands occupy a highly accessible location within the metropolitan transport network. The site is located approximately 1.2 km from Adamstown Station, which provides frequent commuter rail services along the Dublin–Kildare line, connecting the area with Dublin Heuston and the wider metropolitan rail network. The lands are also located approximately 320 metres from the R120 / Newcastle Road corridor, which provides strategic road connectivity and accommodates bus services linking the area with surrounding suburban destinations and transport interchanges.

2.18 The surrounding Adamstown and Clonburris SDZs have been planned and developed as major residential growth locations supported by high-capacity public transport infrastructure and a structured internal road network. The subject lands are therefore positioned within an established urban expansion area where significant transport infrastructure has already been delivered.

2.19 A strategic assessment of public transport capacity was undertaken as part of the submitted Transport Statement, which indicated that the additional peak hour passenger demand associated with development of the subject lands at Finnstown would represent a very small proportion of available rail and bus capacity. The submitted Transport Statement asserted that even under conservative assumptions, the additional public transport demand generated by development would be modest and capable of being accommodated within the existing and planned network.

2.20 A high-level review of road network capacity was also undertaken which demonstrated that development of approximately 550 residential units on the subject lands would generate approximately 370 two-way vehicle trips in the AM peak hour and 333 two-way vehicle trips in the PM peak hour. When compared with typical suburban lane capacity benchmarks of 900–1,200 vehicles per hour, the development-generated traffic represents less than one-third of the theoretical capacity of a single traffic lane, even under deliberately conservative assumptions that concentrate all traffic on a single corridor. The submitted assessment therefore indicates that there is no evidence of a structural road network capacity constraint at this current rezoning stage. Further detailed junction modelling and mitigation design would appropriately be undertaken as part of a future planning application.



2.21 The submitted Transport Statement report also considered the proposed SLO to be attached to the subject lands in relation to development of the lands not commencing until DART+ Southwest has commenced construction. From a transport planning perspective, the submitted analysis demonstrated that the commencement of rail construction does not directly influence the operational performance of the local road network. Factors such as junction geometry, signal staging and traffic flows within the R120 corridor are independent of the construction status of the DART+ project. The submitted Transport Statement concluded that the future development of the subject lands could proceed subject to normal transport assessment and monitoring of network performance, with any necessary mitigation measures implemented at planning application stage. Notwithstanding same, we acknowledge the intent of the SLO proposed by the Planning Authority to be robust and that the future development of the lands is contingent on a series of binding requirements, including the commencement of DART+ South West. It is therefore respectfully put forward that the zoning of the subject lands objective RES can and ought to proceed in order to deliver much needed housing in a planned and coordinated manner.

2.22 It is also worth noting that the future residential development of the subject lands will likely be delivered over a number of phases, as standard given the scale envisaged, which is likely to be over a period of 5-7 years. This would equate to c.100 units being delivered per annum, which the aforementioned submitted Transport Statement finds that the associated traffic impact would be modest and unlikely to materially alter existing roads / junction performance. Additionally, the impact of the phased delivery of housing on the subject lands on existing public transport services in the area would be operationally negligible in capacity terms. The phased delivery of housing on the subject lands is within the carrying capacity of existing rail and bus services and therefore not reliant on the Dart+ Southwest. Furthermore, our client acknowledges that there are other requirements for the development of the lands such as the submission and agreement of an infrastructure masterplan with Uisce Éireann, and the preparation of a comprehensive infrastructure masterplan informed by cumulative development potential, which should also address, *inter alia*, transport impacts, social infrastructure needs, public open space provision, biodiversity considerations, heritage protection and direct active travel connections into Adamstown SDZ.

2.23 The subject site presents a perfect opportunity to zone lands in the Lucan area objective "RES". The proposed zoning of our client's land at Finnstown complies with the proper planning and sustainable development of the area given the locational context of same and complies with national objectives to deliver housing in built up urban areas.

2.24 It is put forward that the current situation is that the only area of land not designated for development in the vicinity is the subject site, which is comprised of privately owned lands that are currently zoned as open space yet not used for any recreational purpose, in fact the only use attached to these lands is agricultural use. The lands have direct access onto the R120 Newcastle / Lock Road. Finnstown House Hotel and Grounds (in third party / separate ownership) lie to the immediate south/south-west of these lands, with a cul de sac of detached houses at Finnstown Fairways bordering the lands to the north-east. The site also has access onto Tandy's Lane to the west/north-west which is to be integrated into an overall revised road network for the Adamstown SDZ which will regulate and control traffic, thus avoiding congestion when completed. This is further supported by the delivery of the Celbridge Link Road to the west. The subject site has been zoned for open space and recreational uses but has not ever been used for this use and therefore no longer serves any useful purpose and lies vacant and undeveloped. Given the roll out of Adamstown SDZ and the delivery of two



significant local parks in same, i.e. Airlie Park (c. 10.95 Ha) and Tandy's Lane Park (c.7.7Ha) both of which include playing pitches, as well as Griffeen Park to the east, namely Vesey Park, it is evident that the local area is well served by existing public open spaces for meaningful recreational use. In light of same, as well as the private agricultural nature of the subject site, it is considered that its current zoned status for open use is no longer required nor practical as it has never been used as public open space. This assertion will be supported by a public open space audit that will accompany any future planning applications on the subject site.

2.25 The aforementioned is supported by the assertions of the Planning Authority who stated as part of the current Variation process that it is *"satisfied that the proposed zoning, when read in conjunction with the SLO and wider Development Plan framework, does not undermine the protection of green infrastructure in Lucan but instead provides for carefully phased, infrastructure-led development at a location where public transport accessibility, existing services and future connectivity can be most effectively leveraged. In summary, while the Planning Authority recognises concerns submitted regarding precedent and loss of greenfield land, it is considered that the rezoning of Finnstown Castle is justified on strategic planning grounds and not setting a precedent due to the capacity audit methodology. The combination of its location, the outcomes of infrastructure and capacity assessment, alignment with compact growth and transit-oriented development principles, and the safeguards embedded within the Specific Local Objective, ensure that the zoning represents a measured and plan-led approach rather than an erosion of Development Plan objectives or green space protection across Lucan"*. We concur with this assertion and given that the initial proposal to zone the lands at Finnstown Castle were supported by both the Planning Authority and the OPR, we request that they are zoned for residential land use upon the adoption of the Proposed Variation No. 2 to the CDP.

2.26 Our client is a well-known house builder, who has delivered hundreds of dwellings in South Dublin County and was involved with South Dublin County Council in a joint venture to deliver housing at Kilcarberry. Our client is currently delivering housing to the south of the county at Oldcourt, with over 500 dwellings built to date, and currently in the process of delivering over 600 units there. Upon the zoning of the subject site at Finnstown, the Planning Authority can be assured that permission for residential development will be sought immediately by our client and upon a grant of permission for same, the permitted development will be carried out and completed in its entirety in line with their track record in the County.

2.27 These undeveloped lands are ideally located for the provision of medium to high density housing (40 – 80 units per hectare) in line with national guidance which will satisfy a current demand and will complement the overall character and pattern of development in the area, including the Adamstown SDZ.



3.0 Existing & Planned Services & Facilities

3.1 The proximity of the lands to a wide range of public transport services including quality bus corridors and the train station at Adamstown will enable sustainable commuting for future residents to the city centre while new residential development in the area will support such investment in public transport infrastructure.

3.2 Directly opposite our client's lands is a Local Centre on the Newcastle Road, while to the north is the large Super Valu shopping centre on the District Centre zoned lands, both of which are within a 400m / 5 minute walking band, thereby providing proximate necessary local services. Other retail services such as in The Crossings in Adamstown (c.1.2km) away are available accommodating Tesco & Aldi with plans we understand to accommodate 18,000sq.m of retail space and 3,500sq.m of commercial uses to include a civic/library building, creche and enterprise centre, while to the north Lidl is open. There are a number of educational facilities in the area, including new schools delivered at Adamstown.

3.3 It is envisaged that our client's lands will cater for medium to high density (40-80 units per ha). The development of these lands as put forward in this submission fully accords with the proper planning and sustainable development of the area and the current zoning objective attached to the lands is an anomaly in the context of existing and planned development in the immediate environs. Development of these lands for housing will impose no traffic difficulties as the road network planned for Adamstown provides for new north-south and east-west distributor roads to replace Tandy's Lane and Dodsboro Road, thereby reducing the existing network to local access roads only. The development of these lands for housing will have no impact on overall traffic in an area that has been planned to cater for circa 8,000 – 10,000 dwellings and associated services and facilities, much of which has been delivered and/or operational.

3.4 In terms of infrastructural capacity, the following is a summary of the details regarding drainage services:

Watermain

There is no existing infrastructure on the subject site, however, along the Newcastle Road to the east, there is a 6" cast iron pipe and 2 no. 200mm diameter watermains. Obviously, a pre-connection enquiry to Uisce Éireann will be required in order to confirm that no upgrades would be required confirming that a water connection was feasible. However, we understand that there are no regional infrastructure upgrade/contributions anticipated, but upgrade works are currently on the planned capital works programme for this area. Once development within the site has planning permission, Uisce Éireann will confirm the cost to be paid by the applicant as part of the Connection Application process.

Foul Drainage

There is no existing infrastructure on the subject site, however, to the north on Old Tandy's Lane and to the north-east at Somerton Green / Avenue, there are 225mm diameter sewers and another 225mm diameter sewer along the Newcastle Road.



The infrastructure serving the Somerton development, which is listed as one of the potential connection points for the site, ultimately discharges into the Tobermaclugg (Adamstown) Pumping Station, which will support circa 20,000 homes. It is not known at this time as to how exactly how many homes are currently being served by this pumping station, however, it is considered that there is adequate capacity in order to serve the proposed development, as there are no current upgrade projects in the area, as notified by Uisce Éireann.

The infrastructure located along the Newcastle Road (R120), which is listed as one of the potential connection points for the site, ultimately discharges into the Esker Pumping Station in Lucan. It is not known at this time as to how exactly how many homes are currently being served by this pumping station, however, it would be our view that there is adequate capacity in order to serve the proposed development, as there are no current upgrade projects in the area, as notified by Uisce Éireann.

Once the proposed development within the site has planning permission, Irish Water / Uisce Éireann will confirm the cost to be paid by the applicant as part of the Connection Application process.

Notwithstanding the above, in relation to both foul and water services, our client acknowledges and has no objection to the requirement of the SLO proposed by the Planning Authority to be attached to the lands i.e. CS7 SLO3 which requires *"An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application"*.

Surface Water

As part of the Adamstown SDZ scheme, a 450mm diameter (tbc) surface water pipe was identified located along the top northern half of the site, adjacent to the existing Somerton development. It is understood that this pipe runs from Tandy's Lane Park to the north through Somerton and on to the existing Westbury Development. This pipe also drains an existing ditch located along Old Tandy's Lane draining from south to north.

Flood Risk

Having checked the OPW flood maps, there is no known flooding on the site, however, the development must be strategically planned in order to mitigate any known risk and take cognisance of any associated areas, which may be affected by flood waters. We note that in the Strategic Flood Risk Assessment for the current County Development Plan the subject site is not at risk of flooding, and is not located in Flood Zone A or B.

Roads / Public Transport Considerations

The site is well served by public transport services with numerous bus operators providing a bus service locally and within walking distance to the site, with 2 no. bus stops adjacent to the site on the R120 Newcastle Road, i.e. the C1 Adamstown to Sandymount service providing buses every 8-10 mins at peak times and the L53 Adamstown Station to Liffey Valley Shopping Centre providing up to 35 services per day. The site is located between a 10-to-15-minute walking distance to Adamstown Train Station to the south with additional connectivity provided by the L53 bus route. The previously submitted Transport Statement provides details of the existing



and planned public transport infrastructure and the impact of the future development of the subject lands on same.

The site has direct access onto the Newcastle Road (R120) to its immediate east while to the west the site abuts Tandy's Lane thus allowing the site to be opened up to connectivity and permeability. The enclosed Transport Statement also assessed the impacts of the future development of the subject site on the existing roads / junctions and finds that there is no evidence of a structural road network capacity constraint at this current rezoning stage. Further detailed junction modelling and mitigation design would appropriately be undertaken as part of a future planning application

4.0 Conclusion

4.1 We request that the proposal to zone our client's lands at Finnstown Castle be reinstated to the current Proposed Variation No. 2 and that upon adoption of same, the lands are zoned for residential land use. The zoning of these lands to cater for housing is in keeping with the character of this suburban area and will complement existing and planned residential development in the environs. Given the adjoining high-density development of Adamstown, we consider that this infill pocket of land, within this overall outer suburban area, can be realistically developed for housing that would be an efficient and sustainable use of existing services and facilities in the locality.

4.2 The development of these lands for residential land use is a sustainable option for this unused, infill pocket of land, particularly in light of all of the aforementioned, necessary existing services and facilities within walking distance of this site. Judicious consideration needs to be paid to the fact that (a) while these lands are zoned for open space use, they are in private ownership with no current need or demand for these lands for open space / recreational use and (b) should the lands remain zoned for open space use they will remain unused and be of no benefit to the wider community, particularly in light of the fact that they are currently being grazed by cattle. There are ample open space / recreational lands / facilities in the immediate environs of the site and as such we contend there is no longer a need to retain the current open space zoning on this site. We note that both the OPR and Planning Authority supported the initial proposal to zone these lands and we are of the opinion that should they remain zoned for open space use, that the targeted delivery of housing in the County in the coming years will not be met.

4.3 The zoning of these lands will consolidate development on the western side of the R120 within the existing development boundary of the County. By zoning the subject site for residential land use accords with the vision set out in the CDP and its Core Strategy as the site abuts Adamstown SDZ and is designated as being within 'Dublin City & Suburbs'. Zoning the subject site for residential land use will be compliant with the Core Strategy and will enable housing to be realistically delivered in a long-established suburban area.

4.4 The site is accessible and serviceable from a roads and traffic perspective. Whilst we acknowledge the previous proposal to attached a detailed SLO to the lands, we are of the opinion that there is no need to stall the delivery of housing on this site until such time as the Dart+ Southwest has commenced and/or is operational, therefore we request that this be judiciously considered in the rezoning of this site for residential land use.



4.5 Our client requests that in adopting the Proposed Variation No. 2 to the current CDP that the proposed zoning of this site be included. Given our client's track record for delivering housing in the County, the Planning Authority can be assured that upon the site being zoned for residential land use, a planning application will be prepared immediately and upon a grant of permission for same, developed and delivered as new housing. Such a planning application will be appropriately prepared and include the necessary masterplans and assessments in terms of ecology/biodiversity, conservation, built heritage, social infrastructure, traffic and transport, infrastructural services etc.

4.6 Taking all of the foregoing into consideration, it is put forward that zoning the subject site at Finnstown for residential land use will contribute to the achievement of compact growth, given its locational context and the quantum of units it is anticipated it can accommodate. The site is located in a long-established suburban residential area, within the built-up footprint of Dublin City and its suburbs with proximate access to a wide range of services and facilities, including bus and train public transport services. There are no impediments to accessing the site from the existing road network, and significant infrastructural investment has been made in the neighbouring Adamstown SDZ which has contributed to roads improvements and public transport infrastructure in the area, all of which can facilitate the development of this site for future housing. In addition, there are no current obstructions to water / wastewater services to cater for housing on this site.

4.7 We request that all of the above be given judicious consideration at this opportune time of considering lands to be zoned for new residential land use, at this time of a national housing crisis. We request that Amendment Ref. No. 3 be reinstated for consideration as part of the Proposed Variation No. 2 to the CDP and that the subject lands at Finnstown Castle be zoned objective RES – Existing Residential upon the adoption of the proposed variation.

Yours sincerely,



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