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31st July 2026

Re: Material Alterations to Variation no.2 to the South Dublin County Development Plan 2022-2028

Dear Sir/Madam,

In accordance with Section 42 (8) (c) (iv) of the Planning and Development Act (2024), which states that in making a variation to a Development Plan, a planning authority shall take due account of any relevant transport strategy of the National Transport Authority (the “NTA”) which relates to all or any part of the functional area of the planning authority, the NTA makes the following observations and recommendations.

1. Transport Strategy and General NTA Position

The Greater Dublin Area Transport Strategy 2022-42 (the “GDATS”) was prepared under Section 12 of the Dublin Transport Authority Act and provides a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA. For the purpose of Section 42 of the Planning and Development Act (2024), the GDATS comprises the relevant transport strategy for South Dublin.

To reiterate our observations made at the previous stage in the variation process, it is the view of the NTA that where it can be demonstrated that sites where accessibility to existing services, including transport, is relatively high and where their development would constitute the consolidation of the built-up area of Metropolitan Dublin or would be contiguous to the built-up area, it may not be in the best interest of maximising transport and land use integration to constrain the development of such sites.

In particular, the level of service currently provided by the existing rail lines; the extensive network of bus services across the County; and the proximity of other services or trip attractors, should be taken fully into account in determining the priority afforded to each site subject of this variation, and any conditions attached to their development. With this in mind, the NTA submits the following observations and recommendations on the Material Alterations to Variation no. 2.

2. Material Alteration 3.1 – Omission of Finnstown Castle

The NTA notes that the proposed Material Alteration removes the rezoning of Finnstown Castle for residential use. As stated in our submission at the previous stage, this site is currently directly served by the C1, L53 and P29 buses which provide a total of 14 services in the peak hour, 12 serving Dublin City Centre and 2 serving Liffey Valley Major Town Centre and Interchange. It is also very close to Adamstown Station which offers 4 rail services to the City Centre in the AM Peak Hour. Furthermore, assuming that any emerging development at this location would provide pedestrian permeability to the north, the C2 may also be considered to be within walking distance of the site, with its offer of 8 services in the peak hour. The lands of Finnstown Castle therefore benefit from a medium-high level of service using the NTA's Public Transport Accessibility Level tool (PTAL) analysis.

With the above in mind, the NTA are of the view that in order to meet the required demand for housing lands in South Dublin County in as sustainable a manner as possible, this site should be rezoned for residential use as originally proposed, but without condition. The development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services and therefore should be prioritised.

NTA Recommendation

The NTA is of the view that, in meeting the Council's requirement to zone additional lands for housing, the local authority should prioritise Finnstown Castle and recommends that this Material Alteration is not made.

3. Material Alteration 6.1 – Omission of St. Edmundsbury

As stated in our previous submission, the site at St. Edmundsbury is served by a variety of radial and orbital services and is therefore accessible by public transport. With this in mind, the NTA are of the view that in order to meet the required demand for housing lands in South Dublin County in as sustainable a manner as possible, this site should be rezoned for residential use as originally proposed. The development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services and therefore should be prioritised.

NTA Recommendation

The NTA is of the view that, in meeting the Council's requirement to zone additional lands for housing, the local authority should prioritise St. Edmundsbury and recommends that this Material Alteration is not made.

4. Material Alteration 11.1 – Omission of Coldcut

As stated in our previous submission, the site at Coldcut is served by a variety of radial and orbital services and is therefore accessible by public transport. With this in mind, the NTA are of the view that in order to meet the required demand for housing lands in South Dublin County in as sustainable a manner as possible, this site should be rezoned for residential use as originally proposed. The development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services and therefore should be prioritised.

NTA Recommendation

The NTA is of the view that, in meeting the Council's requirement to zone additional lands for housing, the local authority should prioritise Coldcut and recommends that this Material Alteration is not made.

5. Material Alterations related to DART+ and Rail – MA 2.1 Adamstown West and MA 4.1 Tubber Lane

The NTA notes the inclusion of the phrase “or equivalent rail service is operational” in the condition for the development of Adamstown SDZ West and Tubber Lane North. The NTA reiterate the position set out in the previous submission which stated that this condition, as originally worded, effectively prioritised housing growth in less accessible locations than Adamstown West or was not relevant in the case of Tubber Lane, and that it should be removed in its entirety.

DART+ SW aims to ultimately increase train capacity from the current 12 trains per hour per direction to 23 trains per hour per direction with an associated increase in passenger capacity from the current peak capacity of approximately 5,000 passengers per hour per direction to approximately 20,000 passengers per hour per direction. This level of service may be introduced on a phased basis.

The definition of “equivalent rail service” and its consequences for SDCC in meeting their housing requirements is therefore unclear. Notwithstanding the NTA's position on constraints being placed on development in the most accessible locations in the County, the NTA are available to assist in defining what would comprise an equivalent rail service in order to ensure that these sites, in particular Adamstown West, can be brought forward in a phased manner in advance of more peripheral sites.

6. Other Material Alterations

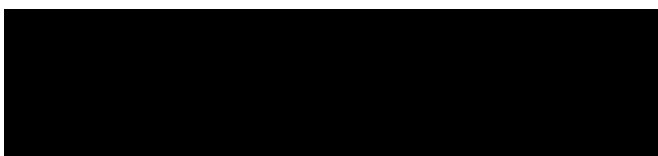
The NTA note the following Material Alterations:

- MA 7.1 – Edmondstown Road
- MA 9.1 – Knockmeenagh
- MA 14.1 – Foxhunter
- MA 16.1 and 16.2 – Liffey Valley
- MA 17.1 and 17.2 – Adamstown South and West
- MA 42.4 – ABTAs
- MA 67.1 – Edmondstown Road

On review of the above, the NTA does not have any significant concerns and welcome those which relate directly to our recommendations made in the first stage of the variation process.

I trust that the views of the NTA will be considered in the assessment of the proposed Material Alteration to Variation no. 2 to the South Dublin County Development Plan.

Yours sincerely,



David Clements
Senior Land Use and Transport Planner