



THORNTON O'CONNOR
TOWN PLANNING

Submission in Respect of

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

Relating to Lands at:

Newlands Farm, Dublin 22 (MA No. 19)

Prepared on Behalf of:

Hibernia Real Estate Group Limited

August 2026

Senior Executive Officer
Forward Planning Section
Planning and Transport
South Dublin County Council
County Hall
Tallaght
Dublin 24
D24 A3XC

Tuesday, 4th August 2026

To Whom It May Concern,

RE: SUBMISSION IN RESPECT OF PROPOSED MATERIAL AMENDMENTS TO VARIATION NO. 2 – RELATING TO LANDS AT NEWLANDS FARM, DUBLIN 22 (MATERIAL AMENDMENT REF. NO. 19)

1.0 INTRODUCTION

Thornton O'Connor Town Planning has been retained by Hibernia Real Estate Group Limited ("Hibernia"), to prepare this Submission in respect of Proposed Material Amendments to Proposed Variation No. 2 to the *South Dublin County Development Plan 2022-2028*. Hibernia are the owners of a c. 58-hectare strategic parcel of land at Newlands Farm, Dublin 22 which forms part of an overall landholding of c.76.89 hectares at Newlands which was proposed to be designated as Future Strategic Long-Term Development Area ("Future SDA") in Proposed Variation 2. The overall landholding is in multiple ownership and includes state owned land.

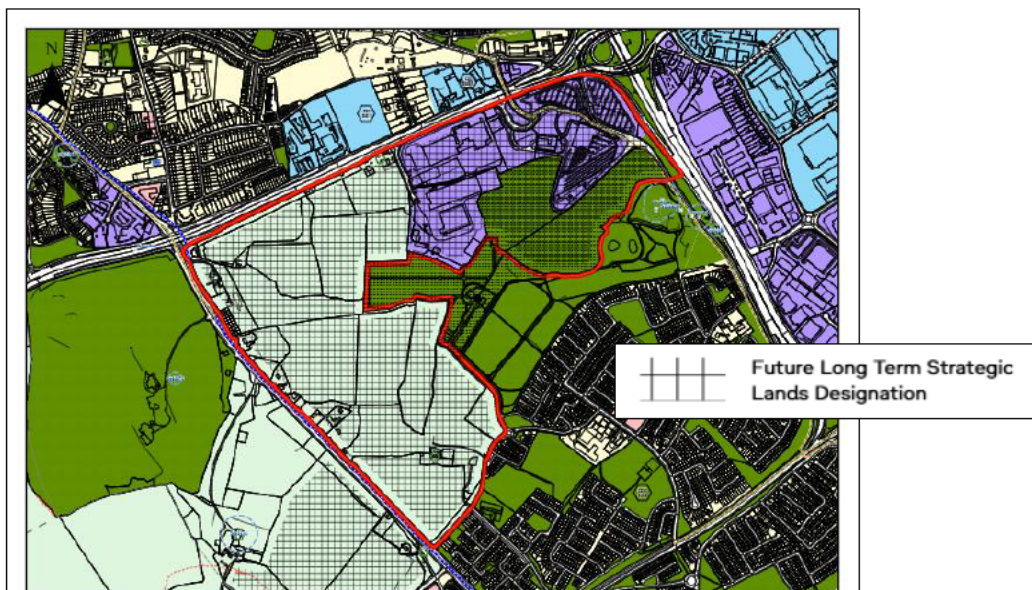


Figure 1.1: Map Showing Previously Proposed Future SDA Designation Pertaining to Lands at Newlands

(Source: <https://www.sdcc.ie/en/services/planning-building-control/development-plan/plan-2022-2028/variation-2/>)

Hibernia's original submission on the Proposed Variation welcomed the designation of Newlands as a Future Strategic Long-Term Development Area ("Future SDA"), and the South Dublin Chief Executive's Report subsequently recommended that this designation be carried forward. In this regard the Chief Executive stated:

*"Having regard to the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) request that planning authorities consider the long-term housing needs of the County for the remaining period of the current adopted plan and the lifespan of the new 10-year development plan; to the need to give clear strategic direction to future development locations under the next 10-year County Development Plan; to the need to enable the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of such lands as the need arises in the 2030s; **and to the location of the proposed SDA within the Dublin City and Suburbs settlement area, it is considered that the identification of lands at Newlands as a Future SDA is appropriate, subject to further detailed analysis of the lands as set out in CS3 Objective 1.**" (Our Emphasis)*

The Chief Executive, in their Report also acknowledged the development potential of Newlands, its suitability for Transport Orientated Development (TOD), including its alignment with the requirements of the Revised NPF (2025) and associated Section 28 Guidelines.

Notwithstanding the Chief Executive's recommendation, the Elected Members resolved not to support the designation, and the Material Amendments now on display propose to remove the Future SDA designation from the lands entirely.

Purpose of this Submission: Hibernia seeks to re-insert the Future SDA designation on the Newlands Farm landholding. Having reviewed the considerations of the Elected Members closely, Hibernia is conscious that a number of the concerns raised may reflect matters that were not as fully or clearly presented to Members as they might have been - including the current physical condition of the lands, the ecological survey work already carried out on site, and the substantial public park and community infrastructure that Hibernia is proposing as part of its emerging vision for the site. Hibernia hopes that the information set out in this submission will be helpful to Members in reconsidering the potential for a Future SDA designation to apply to the lands.

2.0 THE STRATEGIC CASE FOR REINSTATING THE DESIGNATION

The Chief Executive's Report, in recommending the Future SDA designation for Newlands, set out the following rationale:

1. Having regard to the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025), which request that planning authorities consider the long-term housing needs of the County for the remaining period of the current adopted plan and the lifespan of the new ten-year Development Plan;
2. The need to give clear strategic direction to future development locations under the next ten-year County Development Plan;
3. The need to enable the lead-in time necessary for preparatory work by the Council, utility providers, landowners and other key stakeholders to plan for the release of such lands as the need arises in the 2030s;

4. The location of the proposed SDA within the Dublin City and Suburbs settlement area- the Chief Executive considered the identification of lands at Newlands as a Future SDA to be appropriate, subject to further detailed analysis of the lands.

In addition to this, there are several further advantages of the site and the previously proposed designation that Hibernia hopes will be useful context for Elected Members:

- **No Loss of Control to the Council:** Retaining the designation commits the Council to nothing more than the preparatory studies already provided for at CS3 Objective 1. It does not facilitate the landowner in lodging an application for residential use, does not pre-empt the plan led process, and does not remove the Council's ability to shape the ultimate scale, form and phasing of any future scheme. **The zoning of the lands will not change.**
- **Transport Orientated Development:** The site lies wholly within the 800m walking catchment of three Luas Red Line stations (Red Cow, Kingswood and Belgard) and is served by multiple BusConnects routes. Very few greenfield landbanks of this scale in the Greater Dublin Area offer this level of existing multi-modal public transport accessibility, meaning the lands are **exceptionally well placed to deliver compact, sustainable growth without requiring new transport infrastructure to be built first.**
- **A Major New Public Park:** Perhaps most importantly for Elected Members, Hibernia's emerging Masterplan, prepared by Henry J Lyons and Bernard Seymour Landscape Architects, envisages over 17 hectares of public open space (some 30% of the Hibernia landholding) including a substantial extension of the existing 22.66-hectare Ballymount Park. To put that scale in context, 17 hectares is almost twice the size of **St Stephen's Green (c. 8.9 hectares), bigger than the Airfield Estate in Dundrum and the equivalent of 24 No. full size football pitches.** The vision is to create a continuous green corridor of over 1.4 km running from the M50 through to Belgard Road, together with green routes, running and cycling trails, community allotments, retained and enhanced hedgerow and treeline habitats, and wildlife corridors designed in line with Biodiversity Net Gain principles.



Figure 2.1: Image as a Visual Reminder of Scale of St. Stephen's Green Park

(Source: www.pexels.com)

- **Single, Committed Ownership:** Hibernia's ownership of its own 58-hectare parcel, as a single entity, removes the fragmentation risk that can otherwise delay comprehensive, planned delivery across that part of the wider Newlands landholding. Hibernia has consistently supported a plan led approach and is ready and resourced to bring forward a comprehensively planned, phased community once that process is complete. Hibernia is also happy to commit to spend significant capital on sports amenities, green spaces and the restoration of Katharine Tynan House, delivering them and ensuring the local community benefit from the proposals.

3.0 CLARIFYING SOME OF THE KEY POINTS RAISED AT THE COUNCIL MEETING

Hibernia has listened to the Council meeting at which the motion to remove the Future SDA designation (Motion 169) was discussed and recognises that Elected Members raised relevant points for discussion. Hibernia sets out below some information that it hopes will be helpful in clarifying a small number of matters. **Hibernia would be very glad to discuss any of this directly with Members ahead of any further decision.**

3.1 "Green Lung", Biodiversity and Protected Species

Several Elected Members raised concerns about the lands as "*the last remaining green lung between Tallaght and Clondalkin*", their biodiversity value, and the possible presence of protected species including frogs, badgers and threatened birds. Hibernia would like to share some further information that may be helpful in considering these points:

- An ecological survey of the site was carried out by JBA Consulting which was included in a previous submission entitled "*Newlands Farm Proposal in Response to the NPF Implementation: Proposal for Lands to Meet New Housing Growth Requirement*", dated November 2025. It identified the habitats of highest value as the mature woodland, field boundaries (hedgerows and treelines) and watercourses/riparian areas.
- It may also be helpful to note that the site is **not publicly accessible**. It is currently primarily private cultivated land, either heavily grazed or used for growing crops with the use of fertiliser as is usual in farming, which may differ from how the lands have sometimes been perceived in Council Meeting debate.
- Should any protected species be confirmed as present, CS3 Objective 1 already provides for the preparatory ecological studies needed to identify and protect them before any rezoning could be brought forward.
- Hibernia's own emerging Masterplan already commits to Biodiversity Net Gain principles: retention and enhancement of hedgerows and treelines, mammal underpasses where roads cross wildlife corridors, and additional wetland provision to secure landscape connectivity for wildlife.

3.2 Wetlands and Flood Risk

Several Councillors raised a concern that the lands may include a wetland that expands after heavy rainfall, and the importance of retaining it to protect the wider area from flooding. Hibernia agrees this is an important consideration and would like to reassure Elected Members on this point:

- JBA Ecologists have identified a very small wet area with groundwater seepage, together with drainage ditches and an eroding stream feeding the Coolfan Stream and, in turn, the Camac River. As can be seen in the below image, the wet area comprises a small area of less than half a hectare. The initially presented Masterplan **is explicitly designed around these features**, with water elements positioned to complement the natural springs and drainage areas already on site, and additional wetland areas proposed to secure connectivity for wildlife. Similarly, any future Masterplan to be prepared by South Dublin County Council could adopt similar principles.
- Modern surface water management (SuDS), embedded in the plan led process, is capable of maintaining and, in many cases, improving flood attenuation compared to intensively farmed land, where compacted, chemically treated soil can itself increase surface run-off. A qualified drainage and flood risk assessment, undertaken as part of the CS3 preparatory studies, would allow this to be properly tested and would give Elected Members the reassurance they are justifiably seeking.

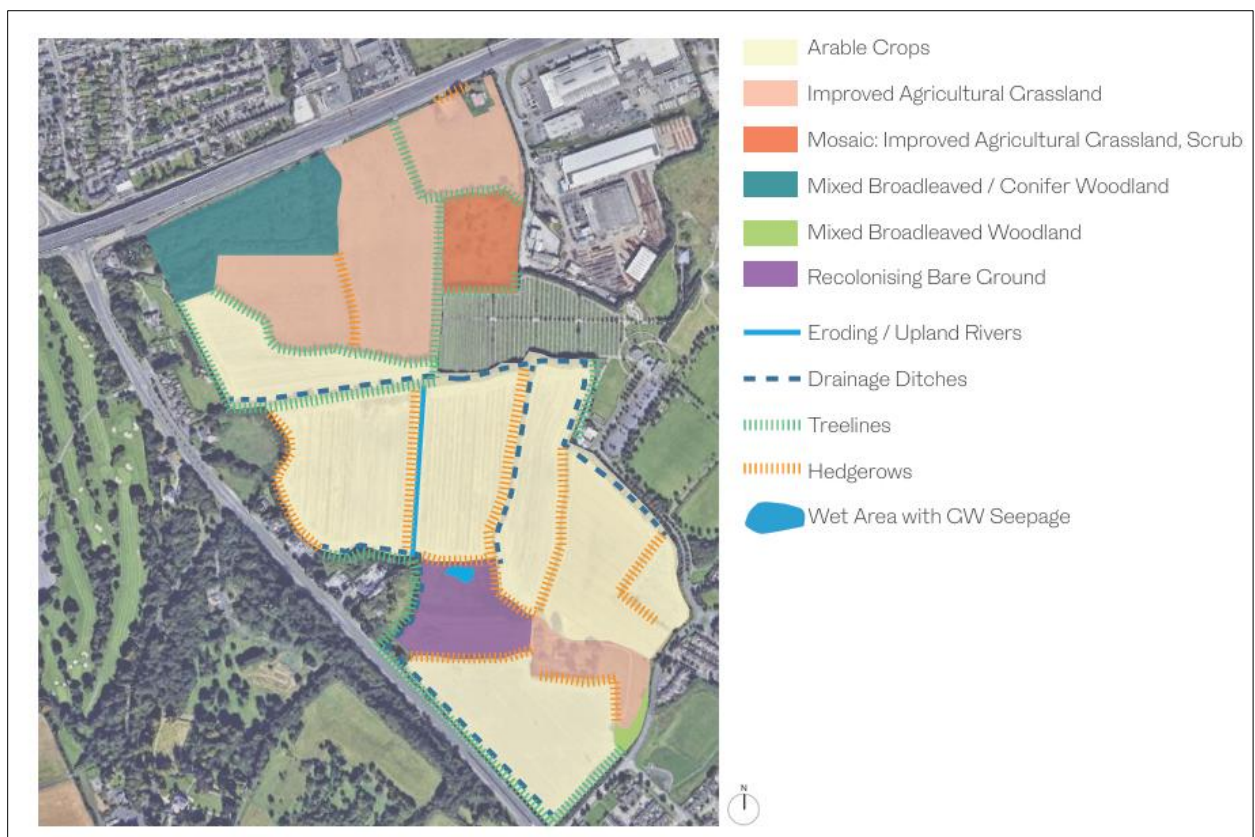


Figure 3.1: Extract from the Habitat Mapping Included in the Newlands Submission entitled "Newlands Farm Proposal in Response to the NPF Implementation: Proposal for Lands to Meet New Housing Growth Requirement ", dated November 2025



Figure 3.2: Extract from the Landscape Masterplan Included in the Newlands Submission entitled "Newlands Farm Proposal in Response to the NPF Implementation: Proposal for Lands to Meet New Housing Growth Requirement ", dated November 2025 Showing the Wet Area

3.3 The South Dublin Development Plan 2022-2028 Plan Making Decision

Several Elected Members placed weight on the Council's decision not to rezone these lands during the 2022-2028 Development Plan process. Hibernia note that the policy context has moved on materially since then, in a way that may be useful for Elected Members to have in mind:

- The National Planning Framework First Revision (April 2025) and the accompanying NPF Implementation: Housing Growth Requirements Guidelines (July 2025) introduced new, higher housing growth requirements, and ask Planning Authorities, as an immediate priority, to plan for housing need over the lifespan of the next ten-year Development Plan. This is a new statutory planning context.
- It was this changed context that led the Chief Executive, having reassessed the lands against the current statutory requirements, to reach a different recommendation to the position taken in 2022. Hibernia would respectfully suggest that this reflects updated national policy rather than any change of view about the lands themselves.

3.4 Transport and Servicing Capacity

A Councillor raised an important and fair question about how the Luas network, and Kingswood and Red Cow stations in particular, would absorb a development of this scale. This is exactly the kind of question that the CS3 preparatory studies and an Area-Based Transport Assessment, in cooperation with the NTA and Transport Infrastructure Ireland, are designed to answer **before any rezoning or development is brought forward**. Assigning the strategic designation is what allows that assessment to happen, so that any future decision is made with the answer to this question in hand.

3.5 The SDA Designation Would Allow Many Aspects of the Elected Members Vision to Come Forward

Hibernia was pleased to note on listening to the Council Meeting, how closely several Elected Members own suggestions for the lands align with the vision already taking shape in Hibernia's emerging Masterplan that was presented to South Dublin County Council in an earlier submission. Councillors were keen to ensure the lands are utilised for a nature, heritage and tourism (Katharine Tynan House), and a county sports hub with community infrastructure. Hibernia hopes Elected Members will find it encouraging, rather than a source of concern, that so much common ground already exists:

- **Restoration of the Two Protected Structures on Site** - Katharine Tynan House and an existing farm building are proposed to be utilised for community focused uses to be agreed with the Council and local community, potentially including a community centre, cultural or arts amenities, and a heritage function.
- **Sports Pitches, Padel and Bowls Courts, a Centralised Sports Management Office and Gym, and Allotments** - responding closely to Councillor's calls for community sports infrastructure.
- **Over 17 Hectares (30%) of Public Open Space** - including wildflower meadows, walking and exercise trails, a woodland walk and areas designed for maximum biodiversity value, together with a c. 1.4km green corridor extending Ballymount Park through Newlands to Belgard Road, thereby directly achieving the nature reserve and green space aspirations raised by many Councillors, while also helping to meet the County's urgent housing needs.

Hibernia would emphasise that the Masterplan referred to above is Hibernia's own, prepared at an early stage to demonstrate what the lands are capable of delivering. Should the Future SDA designation be retained, it will be the Council, through the CS3 preparatory studies and any subsequent Priority Area Plan or equivalent plan-led mechanism, that leads and adopts the masterplan for the lands in due course. **That process would allow Elected Members' own ambitions for the site to be tested, refined and reflected directly in the plan that is ultimately brought forward, rather than being bound by Hibernia's current thinking.**

3.6 The Council's Own Assessment – Recommends the Lands are Designated as a Future SDA But Notes That This is Not a Rezoning

As set out in Section 2.0 above, the Chief Executive's Report already sets out the Council's own considered assessment of why a Future SDA designation at Newlands is appropriate at this time which relates to the need to plan for housing over the lifespan of the next ten year Development Plan, to give clear strategic direction to future development locations, and to allow the lead-in

time needed for the Council, utility providers, landowners and other stakeholders to prepare for the eventual release of the lands in the 2030s. Hibernia would gently suggest that this formal recommendation, put forward by the Council's own planning department, is worth weighing carefully alongside the points raised above.

Separately, and only by way of additional reassurance, the Director of Planning and Transport of South Dublin County Council described at the meeting, in response to Elected Members' questions, the kind of preparatory work CS3 Objective 1 would involve if the designation were retained – importantly ecological and land use studies would be required to be undertaken **before any zoning decision is made.**

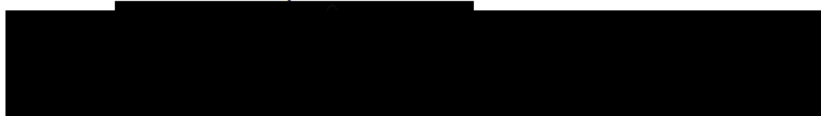
Hibernia understands and respects the concern, raised by Councillors that identifying the lands for study might be seen as a first step toward a predetermined outcome. This is not the case, and safeguards already exist to prevent it: CS3 Objective 2 explicitly protects the holistic, plan-led nature of future development and guards against premature, piecemeal development ahead of a full evidence-based process. The Director also confirmed at the meeting that **this is a study and not a rezoning**, and that any future zoning decision will be brought back to Elected Members once the evidence is gathered, meaning Elected Members retain every opportunity to shape, or indeed decline, whatever comes forward. **Removing the designation now would simply mean that evidence is never gathered, and the lands remain exactly as they are, without Elected Members ever having the fuller picture in front of them.**

4.0 CONCLUSION AND REQUEST

Hibernia hopes that the information set out in this Submission will be helpful to the Executive and Elected Members in considering the Material Amendment which proposes to reject the SDA designation at Newlands. Our client wishes to be clear that its purpose in making this submission is to ensure that Elected Members have the fullest possible picture before a final decision is made. Hibernia respectfully asks that the Council re-insert the Future SDA designation on the Newlands landholding, consistent with the Chief Executive's own recommendation, so that the evidence-led studies provided for under CS3 Objective 1 can proceed. As set out in Section 3.0 above, Hibernia believes that several of the concerns raised in Council Meeting reflect matters that may simply not have been fully visible to Elected Members at the time, and that in a number of respects Elected Members' own aspirations for the site are already closely reflected in Hibernia's emerging proposals.

Retaining the designation commits the Council to nothing beyond the preparatory studies already provided for and leaves every future decision - including the option of no rezoning at all – in Elected Members' control. Hibernia would very much welcome the opportunity to meet with Elected Members, individually or as a group, to walk through the site, the ecological survey and the emerging Masterplan in more detail ahead of any further decision, and looks forward to the Council's consideration of this Submission

Yours faithfully,



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning