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

05 August 2026

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

Dear Madam, Sir,

1.0 Introduction

This submission is made by KPMG Planning (within KPMG Ireland, of the above address) in response to the Proposed Material Alterations to Proposed Variation No. 2 to the South Dublin County Development Plan 2022-2028. It is made jointly on behalf of Cairn Homes Plc (“Cairn”), as strategic delivery partner, and the landowner, the Crowley family (c/o 45 Mespil Road, Dublin 4, D04W2F1), in respect of lands known as “Adamstown South” adjoining and to the south of Adamstown Train Station, Lucan, Co. Dublin.

Cairn has engaged constructively throughout the non-statutory and statutory stages of the Variation process and has previously submitted comprehensive masterplanning and technical material in respect of Adamstown South. Those submissions demonstrate that the lands represent a significant transit-oriented growth opportunity adjoining the established Adamstown settlement and rail corridor, consistent with their identification in the 2023 Opportunities for Transport Orientated Development in Major Urban Centres: Dublin Study as a short-to-medium term opportunity. This submission has been prepared following detailed review of the Proposed Material Alterations, the associated written statement and mapping, the Chief Executive’s Report, Council’s Settlement Capacity Audit and the outcomes of the elected member decision-making process.

1.1 Summary of observations

Cairn’s submission is focused on three interrelated matters:

- Addressing the implications of the Proposed Material Alterations for the overall housing capacity, resilience and delivery assumptions underpinning Proposed Variation No. 2;
- Reaffirming the strategic importance of Adamstown South and West Outer within the future growth framework now being advanced by Council, seeking a strengthened and more time-bound policy commitment to actively progress the necessary technical, infrastructural and masterplanning work during the lifetime of the current Development Plan; and,
- Highlighting Cairn’s concerns regarding the proposed restriction on bulk purchases of residential units, including the risk that the wording, if retained in its current form, could undermine legitimate housing delivery models, specifically create uncertainty for apartment development, and fail to make appropriate provision for the role of Council, The Land Development Agency (LDA), Approved Housing Bodies (AHBs) and other State-supported housing delivery mechanisms.

Cairn respectfully submits that the final adopted Variation should be strengthened in three respects:

1. by including a reconciliation of the revised housing capacity position following the elected members' amendments;
2. by providing a clearer and more active pathway for progression of Adamstown South and West Outer as a Future Strategic Development Area; and,
3. by materially amending the proposed bulk purchase restriction so that it does not constrain apartment delivery, State-supported acquisition mechanisms, LDA activity, affordable housing, cost-rental delivery or other legitimate mixed-tenure housing models.

2.0 Housing growth requirements and land supply resilience

The rationale for Variation No. 2 was to provide the level of additional housing capacity expressly contemplated by the NPF Implementation Guidelines in order to safeguard delivery resilience. Council's own evidence identified a requirement for approximately 11,699 dwellings to 2028 against a forecast deliverable capacity of approximately 9,613 dwellings from existing zoned lands. Variation No. 2 therefore sought to establish an additional capacity of approximately 7,324 dwellings, creating a total capacity position of approximately 16,937 dwellings and thereby providing headroom above minimum housing requirements.

The Proposed Material Alterations mean that a number of residential zoning proposals originally advanced through Variation No. 2 do not now proceed following elected member consideration, while other lands appear to have been introduced through amendment. Therefore, we ask that Council ensures and clearly demonstrates that the lands retained following the elected member amendments continue to provide an appropriate level of additional provision, flexibility and delivery resilience consistent with the evidence base that originally justified the Variation.

Cairn therefore respectfully requests that the final adopted Variation include a full housing-capacity reconciliation identifying the yield originally attributed to the proposed zonings, the yield removed through sites no longer progressing, the yield introduced through new sites and the resulting net housing capacity position. Without this reconciliation it would be difficult to determine whether the final zonings continue to provide the resilient housing supply pipeline that formed a central pillar of the original justification for Variation No. 2.

3.0 Activation of studies for Adamstown South

Cairn respectfully submits that the policy wording should go further because while the current wording identifies the need for future assessment, it does not yet provide sufficient certainty that the necessary work will actively commence during the lifetime of the current Development Plan. A Future SDA designation should function as an **active planning mechanism** through which Council, landowners, infrastructure providers and other stakeholders **begin the preparatory work required** to inform future statutory plan-making. If that work is not commenced near-term, the lands risk being carried forward as an aspiration without the evidence base necessary to enable future decision-making when the next Development Plan process arises. Through the series of submissions made over the past >12 months, Cairn and its master planning design team has demonstrated its readiness and willingness to comprehensively drive forward with such a process.

Council has already recognised that Adamstown South and West Outer represents a strategic future growth location through its designation as a Future Strategic Development Area and through the suite of transport, infrastructure and community planning assessments now proposed. The lead-in time associated with strategic transport modelling, water and wastewater assessment, utilities planning, environmental assessment, Appropriate Assessment, social infrastructure planning and strategic masterplanning is increasingly

becoming the critical path issue for future growth locations throughout Ireland. Experience nationally demonstrates that delays in commencing such work can significantly constrain the ability of planning authorities to bring forward future development opportunities when required. Commencing this work now would not predetermine any future zoning outcome. Rather, it would ensure that future decisions can be informed by a sufficiently robust evidence base when the next Development Plan review commences.

Adamstown South and West Outer presents a particularly compelling case because, unlike many future greenfield growth opportunities, the lands adjoin an established rail-based settlement, benefit from proximity to significant existing and planned public transport investment and offer the potential to support transit-oriented growth in a manner aligned with national and regional compact growth objectives.

Cairn and the landowner have already undertaken significant strategic planning, technical and masterplanning work and remain willing participants in any evidence-led process that Council may elect to commence. Previous studies clearly indicate that Adamstown South has the capacity to make a significant contribution to future housing requirements, subject to future statutory processes and detailed assessment.

While this submission cannot seek for Adamstown South to be zoned through the present Material Alteration process, we seek to highlight a more focussed and constructive point. Council has now acknowledged Adamstown South and West Outer as a Future SDA and has introduced objectives relating to the assessment of transport and infrastructure requirements. **In that context, we ask that the final adopted Variation include a stronger commitment that the necessary strategic planning work will actively commence during the lifetime of the current Development Plan, so that the lands can be properly considered through the next statutory plan-making process.** Cairn therefore requests that the adopted Variation include a specific additional objective in the following terms:

“To actively progress, during the lifetime of the current Development Plan, the strategic planning, transport, infrastructure, environmental, utilities, community infrastructure and masterplanning studies necessary to inform the future statutory planning and plan-led development of Adamstown South and West Outer, including its consideration through the next review of the South Dublin County Development Plan or any other appropriate statutory plan-making mechanism.”

This would ensure that Council’s recognition of Adamstown South as a Future SDA is matched by a practical commitment to undertake the evidence-building necessary to support future decision-making. It is respectfully submitted that this is a proportionate and appropriate response to the strategic importance of the lands, the housing supply context facing the County, and the need for continuity between current and future housing delivery locations.

4.0 Proposed “bulk purchase” restriction

Cairn has significant concerns regarding the proposed wording which seeks to restrict bulk purchases of all units, including apartments, built on lands subject to the Variation, save only for social and/or affordable housing by Council and Approved Housing Bodies (AHBs) as part of the planning consenting process. Cairn sees two separate issues with this restriction.

One is that the restriction applies to apartments as well as lower density housing units. National housing policy is clear that local authorities should be empowered to restrict the bulk purchase of houses and duplexes. This policy is set out in Circular Letter: NRUP 03/2021 issued by the Department of Housing, Local Government and Heritage in 2021. However, the policy is deliberate in excluding apartments from that provision, recognising that the practical and funding context for apartment delivery is materially different from that for traditional family housing. Apartment development in urban and suburban locations frequently depends on multi-unit transactions and other arrangements which differ from individual house

sales. The economics of apartment delivery, particularly in high-demand urban areas and locations where compact growth is promoted, often require a different delivery model from conventional low-rise housing.

The other concern is that the current wording risks inadvertently restricting the bulk purchase of units for social and affordable housing. While the current wording does carve out 'acquisitions by the County Council or AHBs for the purposes of meeting its statutory housing functions', Cairn contends that this wording is open to interpretation, and could be viewed as only exempting from the restriction units acquired under Part V social and affordable agreements. Furthermore, the carve out makes no reference to the Land Development Agency, which is another important delivery vehicle for affordable housing. Again, it is clearly the intention of national policy that bulk purchases of social and affordable housing under all delivery streams, including the Capital Advance Leasing Facility, the Cost Rental Equity Loan and the Land Development Agency, should be facilitated by planning authorities.

Additionally, given how well-developed national policy is in this area, Cairn does not consider it necessary to stitch restrictions on bulk purchase into the development plan. From Cairn's extensive experience, the Development Management functions of local authorities, including in South Dublin County Council, are effective in enforcing this policy through the imposition of planning conditions on development.

However, if Council is minded to retain a provision in the development plan relating to the bulk purchase of housing units, Cairn asks that the current wording be substantially amended to address the concerns highlighted above. Cairn submits that the following wording would be aligned with national policy in this area:

"Any policy relating to bulk purchase shall **not apply to apartment development** and **shall not restrict, prejudice or inhibit acquisitions, forward purchase arrangements, delivery partnerships, affordable housing delivery, cost-rental delivery or other State-supported housing delivery mechanisms** involving South Dublin County Council, Approved Housing Bodies, The Land Development Agency or equivalent public bodies."

5.0 Conclusion

Cairn respectfully submits that Council pursue the following ahead of the adoption of Variation No.2:

- Council publish a reconciliation demonstrating if and how the final zonings continue to provide the level of housing capacity, flexibility and resilience originally relied upon to justify the Variation;
- The Future SDA designation applying to Adamstown South and West Outer be strengthened through a clear commitment to commence the strategic studies and evidence-gathering necessary to inform future statutory plan-making; and,
- The proposed bulk purchase restriction on apartments be aligned with National Policy (note Circular Letter: NRUP 03/2021) and amended to ensure that it does not prejudice apartment delivery, State-supported acquisition mechanisms or the activities of Council, the LDA, or AHBs.

Cairn remains committed to constructive engagement with Council and considers that the amendments sought would strengthen the overall Variation, support future housing delivery and provide an appropriate framework for the long-term sustainable planning of Adamstown South and West Outer.

Yours sincerely,



Stephen M. Purcell MIPI FSCSI FRICS
Director, Head of KPMG Planning
KPMG Ireland