

**SUBMISSION ON PROPOSED MATERIAL
ALTERATIONS TO PROPOSED VARIATION
NO. 2 TO THE SOUTH DUBLIN COUNTY
DEVELOPMENT PLAN 2022-2028**

**- PORTION LANDS OF THE FORMER DUBLIN
CITY SERVICES SPORTS & SOCIAL CLUB
GROUNDS, COLDCUT ROAD, CLONDALKIN,
DUBLIN 22**

Client: Beldare Homes

Date: 05.08.2026

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1.0 INTRODUCTION AND PURPOSE OF SUBMISSION

1.1 Foundation is instructed by Beldare Homes, Beldare House, Harmony Hill, Sligo. Co. Sligo, to make this submission to South Dublin County Council relating to the proposed material alternations to the proposed variation No. 2 to the South Dublin County Development Plan 2022 – 2028. The submission relates to lands located to the south of the Coldcut Road, Clondalkin, Co. Dublin.

1.2 We note the following proposed material amendment, to which this submission relates:

MA11.1

Amendment Ref. No. 11 Coldcut (Book of Maps)

To omit Amendment Ref. No. 11 (See Book of Maps)

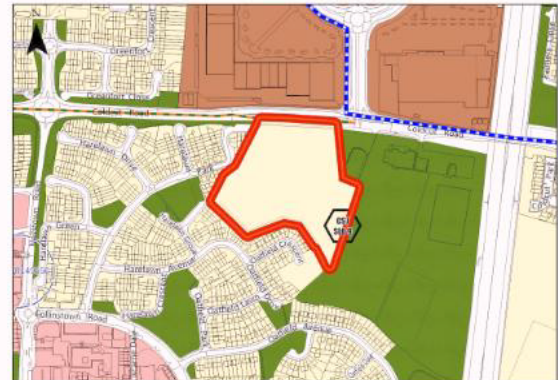
Amendment Ref. No. 11 Coldcut Road

Proposed Material Alteration/s

Note: For full details on SLO amendments / additions as shown in this book of maps, please see the accompanying changes to the written statement.

MA 11.1

To omit Amendment Ref. No. 11



Variation as Published



Amendment Proposed

1.3 The core point of this submission is that, in the context of the lands being suitable for zoning when measured against all available objective metrics, as further described below in this submission, and with a significant under zoning now being proposed when measured against the NPF requirements, the decision not to zone these lands is unintelligible and contrary to proper planning and sustainable development.

1.4 A core objection to the zoning would appear to be based on the grounds that the land should remain as open space. This is misplaced and opportunistic and it ignores the fact that the lands subject to the rezoning are currently unused and overgrown. The lands were formerly used as a playing pitch in association with the wider club which includes a clubhouse with bar, pitch and putt, and numerous pitches, on the lands to be retained as Open Space. More significantly, it ignores the Specific Local Objective CS7 SLO9 which accompanied the proposed zoning and which would provide for

improved public access, permeability and recreational facilities on the remaining OS zoned lands. This represents a significant planning gain / betterment over the current situation.

2.0 SITE LOCATION & DESCRIPTION

- 2.1 The overall landholding subject site extends to a total overall area of 10.82 hectares. Part of the lands to the western portion were formerly used as a playing pitch in association with the wider club which includes a clubhouse with bar, pitch and putt, and numerous pitches, all on the eastern part of the lands.
- 2.2 Access is via the Coldcut Road with an existing one way in/out entrance.
- 2.3 The site is bounded to the east by the M50 Motorway, to the north by the Coldcut Road and is surrounded in the west beside Larkfield House development.
- 2.4 The western portion of lands are not connected to the main subject lands, with vegetation between such lands and the pitch and putt course.
- 2.5 These extend to an area of 2.43 hectares and bound Harelawn Park estate.
- 2.6 The whole landbank has an extensive boundary treatment and extensive but not continuous frontage onto the Coldcut Road.
- 2.7 In terms of access, the Coldcut Road is subject to a major upgrade as part of the BusConnects Liffey Valley Corridor project, enhancing bus facilities, services and overall frequency improvements. Current access arrangements will be enhanced and improved upon where feasible.
- 2.8 The site is a short walk from Liffey Valley Shopping Centre, and around 10km west of Dublin City Centre, serviced by a number of current and future bus routes.



Figure 1: Location of site boundary
Source: Google maps



Figure 2: Clubhouse Building & Associated Car Parking



Figure 3: View from Coldcut Road Entrance

3.0 APPROACH TO ZONING OF RESIDENTIAL LAND

- 3.1 There are a number of key guidance documents, and key policies/objectives within planning policy guidance documents, which govern and guide the approach to zoning in general and zoning for residential purposes. We refer to an account of same at Appendix 1.

4.0 SUMMARY OF CURRENT & EMERGING LOCAL PLANNING POLICY CONTEXT

South Dublin County Development Plan 2022 - 2028

- 4.1 The subject site area is located in the Palmerstown-Fonthill area of South Dublin, considered within the Core Strategy determinations of the South Dublin County Development Plan 2022 – 2028 as falling within the ‘Dublin City and Suburbs’ area.
- 4.2 Within this area are a number of settlements with their own defined name and area; the subject site is considered to fall within the ‘Lucan, Adamstown, Palmerstown’ neighbourhood area. The below table indicates the relevant allocations of lands and expected units.

Table 9: Capacity of undeveloped lands within South Dublin

Greenfield sites						Brownfield sites					
Settlement Type	Settlement Name	Residential (HA)		Residential (Units)		Mixed-Use (HA)		Mixed-Use (Units)		Total Potential (HA)	Total Potential (Units)
Dublin City and Suburbs	Tallaght	22.5	0	661	0	0	25.43	0	2,767	48	3,428
	Naas Road / Ballymount (City Edge)	0	0	0	0	0	21.73	0	1,123	21.73	1,123
	Templeogue, Walkinstown, Rathfarnham, Firhouse	91.5	0	3,946	0	0	11.88	0	890	103.38	4,836
	Clondalkin, Clonburris and Grange Castle	4.05	10.84	286	798	70.39	17.62	2,660	1,355	101.9	5,099
	Lucan, Adamstown, Palmerstown	5.92	0.36	464	20	39.62	16.93	1,099	1,226	62.83	2,809
	Citywest	31.54	2.64	1,884	159	2.45	2.25	245	135	38.88	2,423

Figure 5: Extract from Table 9; Capacity Table South Dublin County Development Plan

- 4.3 The subject site is zoned ‘OS – Open Space’ in the South Dublin Development Plan 2022 – 2028, which has the objective “To preserve and provide for open space and recreational amenities”.
- 4.4 Under the zoning category, ‘Residential’ use is ‘Open for Consideration’ but only where it accords with the policy objective H3 Objective 4, which states the following:

To support community led housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open spaces is deemed to be adequate and the amenities of the area are preserved.



Figure 6: Extract from South Dublin County Development Plan 2022-2028 Zoning Map (site outlined approximately in red line)

Variation No.2 – Initial Public Consultation Draft

- 4.5 As of the end of February 2026, South Dublin County Council initiated consultation on the proposed Variation No.2 of the County Development Plan, in response to recent changes in national planning policy, specifically:
- NPF Implementation: Housing Growth Requirements (2025), and
 - Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).
- 4.6 Under the updated national methodology, South Dublin County must accommodate 11,699 additional homes between 2025 and 2028. This represents the baseline housing growth requirement derived from a revised annual target of approximately 3,270 units per year for the county. A critical point of note here is the fact that these date ranges do not account for the time frame for the lands to undergo this variation process, have a planning application prepared, granted and proceed to construction stage. Therefore, the reality of not delivering these homes before the end of 2028 will be further and disproportionately compounded by each proposed site that is not zoned.
- 4.7 The Ministerial Guidelines also allow planning authorities to zone land for up to 50% additional provision above the baseline requirement to ensure flexibility and account for delays or non-delivery of sites. Applying this mechanism increases the potential housing provision to 17,549 units to 2028 (11,699 baseline units plus a potential additional provision of approximately 5,850 units).

- 4.8 In relation to the subject lands off the Coldcut Road, a proportion of the lands were included in the proposed variation which was subject to public consultation. Figure 6 below shows the originally proposed changes to the zonings:

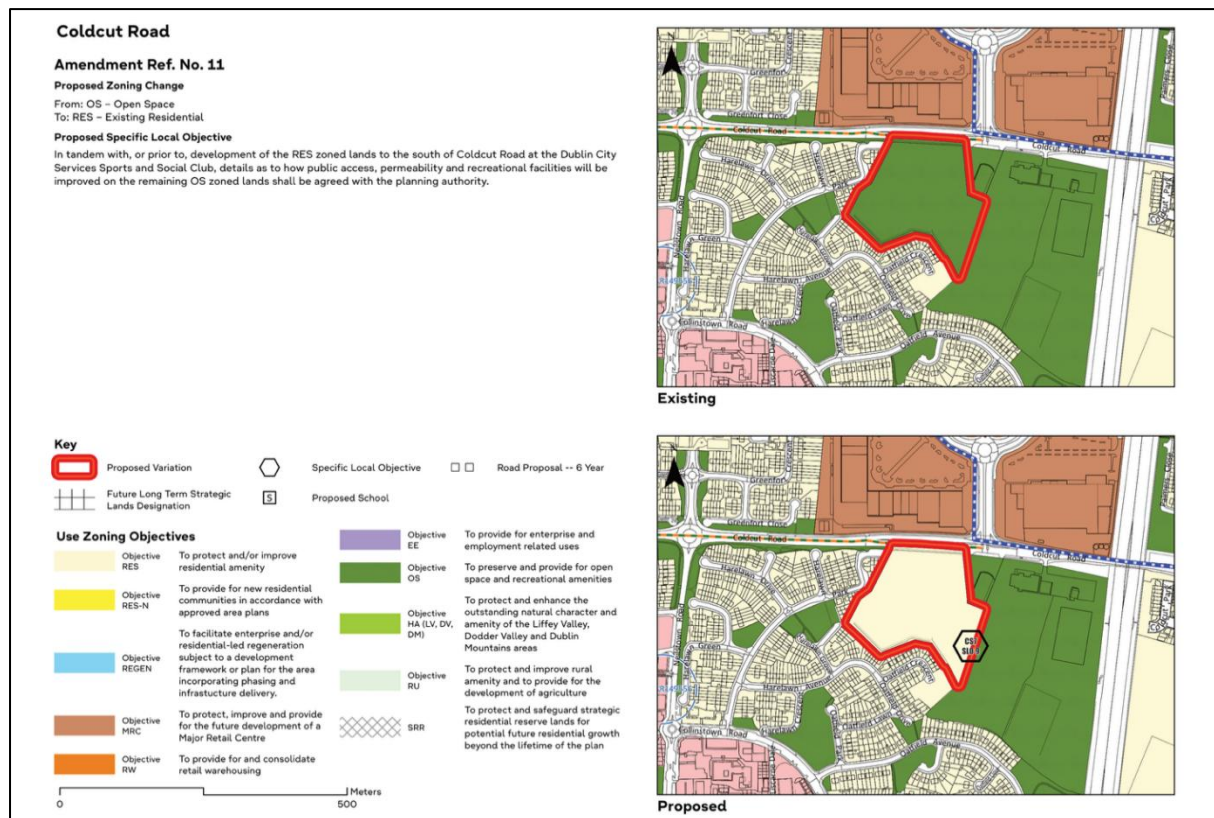


Figure 7: Extract from Zoning Designation changes as part of the Variation No. 2 of the South Dublin County Development Plan 2022-2028 (changes outlined approximately in red line)

- 4.9 Under the proposed rezoning, a total of 3.06 hectares had been re-designated from 'OS – Open Space' zoning to 'RES – Existing Residential', with the remaining portion of lands retaining their 'OS' zoning status.

- 4.10 Additionally, a Site Specific Objective had been included within the entire landholding, which is noted as CS7 SLO 9, which reads as follows:

"In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social Club, details as to how public access, permeability and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority."

- 4.11 It is worth noting that a number of elected members referred to the absence of such information at the zoning stage, however, as clearly outlined, this is a matter for the planning stage and not the zoning stage. This objective clearly gives the planning authority additional powers to ensure that the site is appropriately master planned in line with their objectives. Additionally, to provide such information at this stage would have been premature.

5.0 JUSTIFICATION FOR 'RES' ZONING OF LANDS

- 5.1 We note that the Chief Executive supported the zoning of the lands. We note in particular the following quote from the Chief Executive's Report¹:

"The lands at Coldcut Road were considered suitable to support strategic housing development. It was concluded through this process that residential development could be supported on these lands in terms of social and physical infrastructure, access to parks and sustainable planning objectives. This approach considers current and proposed developments in the area. In order to meet the housing growth targets the subject lands are considered a suitable opportunity to support residential development encouraging the objectives of compact settlements focusing development in metropolitan areas in a sustainable manner. The inclusion of the accompanying Proposed Specific Local Objective CS7 SLO9, outlined above, will enable the delivery of the remainder of the wider site for recreational and amenity purposes to serve the wider community".

- 5.2 The overall conclusion in the Chief Executive's Report relating to the zoning of the lands is also noteworthy:

"South Dublin has undertaken extensive analysis to identify lands which are considered to best meet the national, regional and local policy objectives of compact growth, accessibility, sustainable mobility and climate action and to deliver on the revised housing targets set for the county. It is considered that the proposed lands are ideally situated to deliver on transit-oriented development in line with national and regional policy objectives. It is further considered that CS7 SLO9 attached to the proposed rezoning will ensure that the lands remaining as open space will provide for improved and publicly accessible recreational amenity to the advantage of both new and existing residents in the area.

As set out in Section 2 of this CE Report, the OPR has made one recommendation which is to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation. Planning authorities are requested to 463 implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

In order to address the issues raised by the Department of Education and Youth it is recommended that proposed Specific Local Objective CS7 SLO9 be added to as follows:

CS7 SLO9: Having regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development"

- 5.3 Despite the support of the Executive, we note that the zoning was not supported by elected members.
- 5.4 We further note that the decision to reject this, and other (at Finnstown Castle and Edmondsbury, in particular), zoning proposals places the planning authority at significant deficit in terms of meeting their requirements for zoned lands.

¹ Chief Executive's Report, May 2026, on Proposed Variation No. 2

- 5.5 In the context of the lands being suitable for zoning when measured against all available objective metrics, as further described below, and with a significant under zoning now being proposed when measured against the NPF requirements, the decision not to zone these lands is unintelligible and contrary to proper planning and sustainable development
- 5.6 The subject lands are considered appropriate for residential zoning, aligning with the requirements and assessments in determining sequential and appropriate lands for rezoning as outlined in Section 3.0 above.
- **Sequential Location:** The subject lands are within the existing built-up area of Clondalkin and adjoin established residential development, representing a logical consolidation of the urban footprint.
 - **Serviced Urban Lands:** The subject lands are located along Coldcut Road within an area already supported by existing road, utilities, and community infrastructure.
 - **Accessible Location:** Proximity to key transport corridors, including Coldcut Road and the M50, together with existing and planned public transport services. In fact, the NTA submission on the proposed variation noted that *“The sites at St. Edmondsbury (sic), Liffey Valley and Coldcut are served by a variety of radial and orbital services while the site at the Foxhunter could potentially be served effectively by the same services, subject to details of any emerging development proposal”*.
 - **Accessibility of Lands:** The planning authority has accepted that the lands at accessible from the existing public road infrastructure. We note the following quote from the Chief Executive’s Report:

“It is the opinion of the Chief Executive that the proposed Coldcut lands have potential options for access in their current form. While the addition of lands to the east of the current proposal may give additional mobility access options such options may not be necessary”.
 - **Integration with Existing Communities:** The lands are directly bounded by established residential neighbourhoods, allowing development to integrate with the existing urban structure.
 - **Infrastructure Capacity:** The location allows efficient use of existing services and infrastructure while accommodating appropriate access and servicing upgrades where required.
 - **Compact Growth:** A residential zoning would support national and regional planning objectives by facilitating sustainable residential development on well-located lands within the urban area.
- 5.7 A core objection to the zoning would appear to be based on the grounds that the land should remain as open space. This is misplaced and opportunistic and it ignores the fact that the lands subject to the rezoning are currently unused and overgrown. The lands were formerly used as a playing pitch in association with the wider club which includes a clubhouse with bar, pitch and putt, and numerous pitches, on the lands to be retained as Open Space. More significantly, it ignores the Specific Local Objective CS7 SLO9 which accompanied the proposed zoning and which would provide for improved public access, permeability and recreational facilities on the remaining OS

zoned lands. This represents a significant planning gain / betterment over the current situation.

- 5.8 We respectfully invite the planning authority to not accept the rejection of the proposed residential zoning and associated Specific Local Objective on these lands.

Yours faithfully,



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FOUNDATION
THE PINNACLE IN PLANNING AND PROJECT MANAGEMENT

APPENDIX 1

Planning Policy and Guidance on Approach to Zoning

National Planning Framework (NPF) First Revision, April 2025

The National Planning Framework (NPF) provides strategic policy guidance which provides the framework for subsidiary plans. There are a number of National Policy Objectives (NPOs) in the NPF which are considered to be of particular relevance to this submission.

NPO 101 relates to the approach to zoning of lands, and states that

“Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan”.

NPO 43 speaks to the prioritisation of homes at sustainable locations, stating:

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location”.

The NPF in general terms encourages growth within exiting built-up areas, and within the five cities. This is expressed in NPO 7 and NPO 8.

NPO 7 is to:

“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth”.

NPO 8 is to:

“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”.

Development Plan Guidelines for Planning Authorities 2022

Section 4.4.2 Lands/Sites proposed to be zoned:

“Estimating requirements for land and sites to be zoned for residential or a mixture of residential and other uses must follow on from an assessment of whether the amount of land already zoned is adequate to meet the housing needs of the area. The rate of take-up and build-out of such land over a preceding period of at least 6-10 years is an important consideration in this regard.”

“Such analysis must also consider trends and projections in respect of rural housing output and infill development/building refurbishment, as well as whether land already zoned may be serviced or serviceable within the six-year life of the plan.”

“It is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development land. However, it is recognised that there is a need for some degree of competition and choice in the residential development land market and to ensure a future pipeline of well-located serviced land. Accordingly, in considering whether to zone additional new land and sites for residential (or a mixture of residential and other uses) to meet housing need, planning authorities must ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the development plan, while also considering and factoring in the proportion of projected housing need to be met on unzoned land in rural areas.”

The sequential test for zoning is a key tenet of the planning system and the approach to zoning of land for residential development. The below extract from Section 4.4.2 of the Guidelines sets out the sequential approach to zoning:

Sequential Test for Residential Zoning in Settlements

- STEP 1:** As outlined in Chapter 4, the core strategy of the development plan will be formulated and provide a housing unit targets for settlements and rural areas This will be based on a **Settlement Capacity Audit** providing estimates of housing yield for (i) Served [Tier 1] lands and (ii) Serviceable [Tier 2] lands in settlements.-
- STEP 2:** n accordance with the **Sequential Test**, identified lands with potential for new residential development that are situated within or closest to the settlement core (including brownfield, infill and redevelopment sites) shall be zoned to facilitate residential development with/without other land uses as appropriate to fulfill the identified core strategy requirement. This exercise should be based on an assessment of the quantum of housing to be delivered on individual sites or land parcels, such that when aggregated, there is sufficient capacity to deliver the core strategy housing target for the subject settlement.
- STEP 3:** Where it is necessary to zone serviced, but spatially less central lands (i.e. 'Tier 1' lands) to meet core strategy requirements, these shall be identified and prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference, and first zoned for development). As part of this process, estimates of housing yield from such zonings must be considered against **Core Strategy** requirements.
- STEP 4:** Subsequently, where it is also necessary to zone unserved, but serviceable, spatially less central lands (i.e. 'Tier 2' lands) in order to meet core strategy requirements, these shall be identified and prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference and first zoned for development). Clear estimates of housing yield from such zonings must be considered against **Core Strategy** requirements.

Figure 4: Extract from Section 4.4.2 the Development Plan Guidelines 2022

Section 4.5.2 of the Guidelines relates to the approach to distribution of housing allocation across a County or City in terms of zoning, stating:

“In principle, the greatest proportion of targeted population and housing growth should generally align with the larger settlements, where social and community infrastructure is available at scale and there is also likely to be greater provision of employment and services. There may be other relevant factors, such as proximity to a high quality public transport corridor, which could provide justification for targeting a greater level of growth in one settlement over another.

The distribution of population and housing targets to the various settlements in the settlement hierarchy, including rural areas, will require an evidence based assessment. A comprehensive capacity audit of the land and sites with potential for development at a settlement level, is a prerequisite to inform the drafting of the settlement strategy. The planning authority should analyse the capacity of each settlement to accommodate new development in terms of suitable lands and infrastructure within the plan period”.

Section 6.2.3 of the Guidelines relates to ‘Sequential Approach to Zoning for Residential Development’ and states that:

“In undertaking the zoning function for new residential development at individual settlement scale, it is recommended that planning authorities adopt a sequential approach which reflects

the compact growth, utilisation of existing infrastructure and town regeneration national policy objectives of the NPF, further developing the Tiered Approach²².

“The Town Centre First and compact growth approach can be achieved through the prioritisation of lands closest to the centres of settlements. Planning authorities are therefore required to utilise a sequential approach when considering proposals for land-use zoning, in particular for residential development.”

“It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.”

The Guidelines also clearly allow for the concept of ‘additional provision’, a concept further established by the NPF Implementation Guidelines, and its use and application encouraged at Government level, with the scope for additional provision now increased to 50%.