

PLANNING SUBMISSION

August 2026

Submission on Proposed Material Alterations to Variation No. 2 of the South Dublin County Development Plan 2022–2028

Adamstown West — Proposed Material Alterations to Proposed Variation Nr 2

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Appendices

- 1. Stephen Little & Associates - Planning Submission**
- 2. Atkins Realis - Transport Submission**
- 3. KPMG - Preliminary Social Infrastructure Report**

1. Introduction

Evara welcomes the opportunity to make this submission in respect of the Proposed Material Alterations to Variation No. 2 of the South Dublin County Development Plan 2022–2028.

This submission is supported by independent technical evidence. AtkinsRéalis has assessed the accessibility of the lands; KPMG has assessed the capacity of existing social infrastructure; and Stephen Little & Associates (SLA) has reviewed the proposed alterations from a planning and policy perspective.

Below are the key points from this submission:

KEY TAKEAWAYS

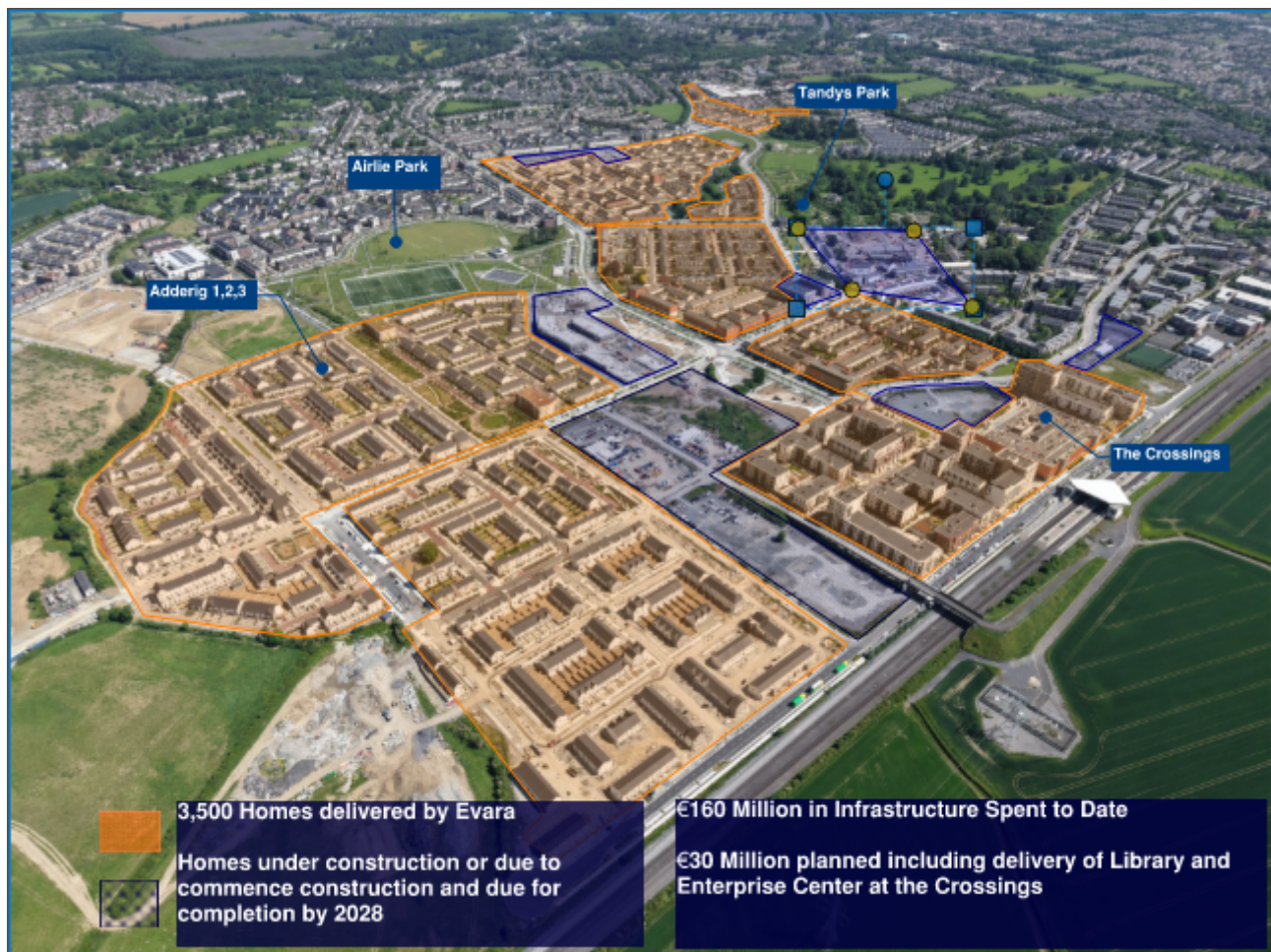
1. Adamstown is approximately 75% complete, with the final homes within the existing SDZ scheduled for completion by 2028.
2. Approximately 85% of Adamstown's planned infrastructure has already been delivered, representing an investment of approximately €160 million of the €190 million total infrastructure programme which will also benefit Adamstown West
3. Traffic generated by Adamstown West will be primarily directed towards the western side of Adamstown, reducing reliance on the Newcastle Road and integrating with the established Adamstown street network.
4. Adamstown West is already well served by public transport, with existing rail and bus services to be further strengthened by planned NTA bus network improvements from 2027.
5. Evara's objective is to commence construction at Adamstown West in 2028, aligned with the estimated commencement of construction of DART+ Southwest, with the rail project expected to become operational approximately three years thereafter.
6. Requiring DART+ Southwest to be operational before significant residential development can commence would materially delay housing delivery, pushing Adamstown West beyond the Government's objective of accelerating housing delivery over the period to 2030 – the very purpose for which local authorities were directed to identify additional, deliverable housing lands.

Evara has been delivering homes and infrastructure in Adamstown for almost a decade where 6,000 homes have been delivered, alongside Adamstown Town Centre, approximately 40 acres of public parkland and a wide range of everyday amenities and community facilities. Planning is complete across Evara's existing Adamstown landholding and between Evara and Tierra Construction the remaining units will be delivered by 2028. The existing Adamstown SDZ is therefore entering its final phase of delivery.

Adamstown West is the natural next phase. It directly adjoins the established SDZ, benefits from the significant investment already made in transport, utilities and community infrastructure, and can be delivered through the existing development teams already operating in Adamstown. Evara is ready to maintain the momentum of housing delivery as development transitions westwards.

It is against this backdrop that Evara wishes to raise significant concerns about the practical implications of the proposed Material Alterations and the substantial delay this will cause to the delivery of Adamstown West. As currently proposed this material alteration **will sterilise the development of these lands beyond Governments 2030 accelerated housing delivery period** therefore defeating the purpose of the rezoning in the plan period.

Adamstown West is a sustainable, well-serviced and deliverable extension of Adamstown and can support the continued delivery of homes as the existing SDZ approaches completion. The image below shows the advanced status of the existing SZD.



2. Adamstown West – A Decade of Investment and Delivery

Adamstown is one of the most significant residential development projects in Ireland, with a Gross Development Value in excess of €3 billion. Over 6,000 homes have been delivered to date, supported by major investment in physical and social infrastructure, including more than 40 acres of public parkland, a town centre at The Crossings, schools, childcare facilities, a Primary Care Centre, community facilities and an established transport and active travel network.

Adamstown West represents the natural next phase of this established and successful urban community, building upon almost a decade of investment and delivery by Evara and other stakeholders.

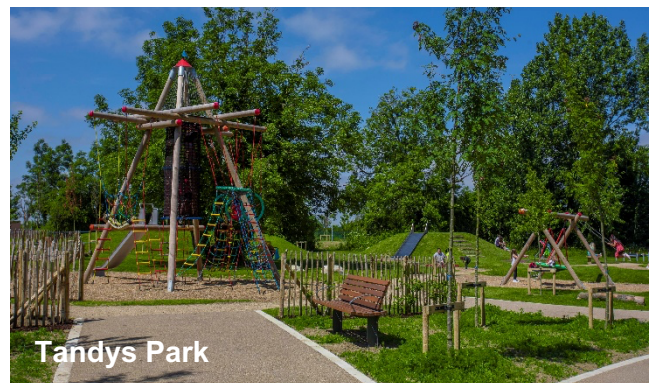
Parks, Recreation and Open Space

A key focus of Evara's approach has been the early delivery of high-quality parks and recreational amenities. More than 40 acres of public parkland have been provided within Adamstown, creating an extensive network of accessible open spaces for existing and future residents.

This includes Airlie Park, a 27-acre public park providing an exceptional range of sporting and recreational facilities, including a full-sized 3G GAA pitch, cricket oval with practice nets and wickets, three tennis courts, a basketball court, a multi-use games area and a range of dedicated play spaces for children.

Tandys Park adds a further 19 acres of green space with four interconnected play spaces and a dedicated teen zone.

These facilities are already established and form part of the wider social and recreational infrastructure available to the Adamstown West lands.



Education and Childcare

Education and childcare infrastructure have similarly formed an important part of Evara's investment in Adamstown.

Evara has delivered creche facilities at St Helen's, which has been leased to Giraffe and is due to become operational shortly. Further creche facilities have secured planning permission at Tandy's Lane and The Crossings, with Agreements for Lease already secured with childcare operators, providing a clear route to these facilities becoming operational following construction in 12 – 24 months.

Evara has also delivered two school sites to the Department of Education, supporting the provision of education infrastructure required to serve Adamstown's growing population.

Retail and Everyday Amenities

Evira has also placed significant emphasis on ensuring that residents have convenient access to the services and amenities required for day-to-day life.

At the heart of Adamstown is The Crossings, representing an investment of approximately €500 million and providing more than 97,000 sq ft of retail accommodation. The Crossings includes three supermarkets together with restaurants, fitness facilities and a broad range of neighbourhood retail, café, leisure and personal service uses.

The Crossings has established a strong commercial and community heart for Adamstown and provides an important range of services within easy reach of the Adamstown West lands.



Health and Community Infrastructure

The wider development has also delivered important health and community facilities. Evira has provided a 29,000 sq ft Primary Care Centre and a community centre, while planning permission has recently been secured for a new Library and Enterprise Centre at The Crossings with construction due to commence in 2027.



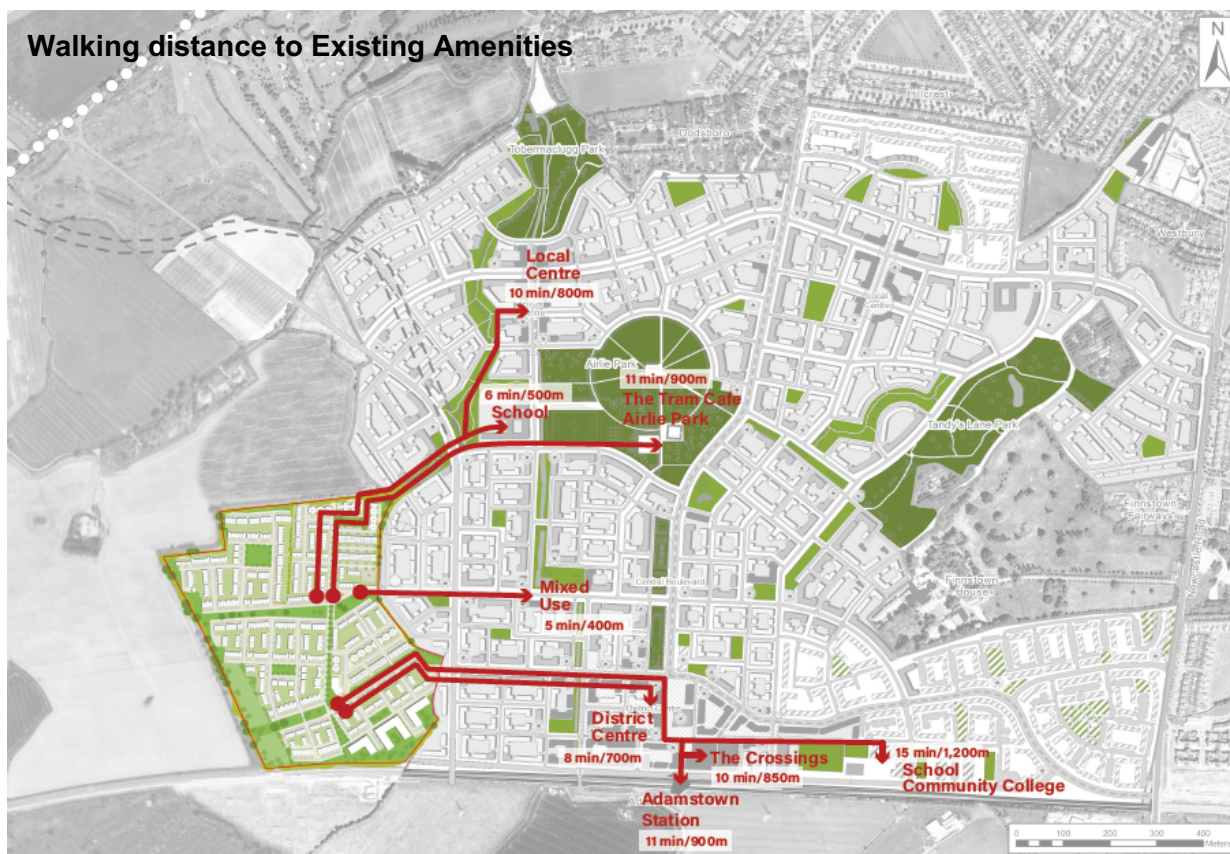
Adamstown West – Connected to an Established Community

Together with the established schools, childcare facilities, parks, sporting amenities, retail and services, these facilities demonstrate the maturity of Adamstown as an established and increasingly self-sustaining urban community. A full list of all adjacent social infrastructure is available in the appended KPMG Preliminary Social Infrastructure Audit.

Adamstown West should therefore be considered in the context of the substantial infrastructure and community investment that has already taken place across Adamstown.

The lands do not represent an isolated or standalone development. Rather, they form a logical westward extension of the established Adamstown urban structure and will benefit directly from the significant investment already made in transport, education, childcare, healthcare, retail, recreation and community infrastructure.

The plans below demonstrate the excellent accessibility of the Adamstown West lands to the extensive range of existing and committed services and amenities already established throughout Adamstown. This existing infrastructure provides a strong foundation for the sustainable development of Adamstown West and its integration into the wider Adamstown community.



3. Material Alteration MA2.1 – DART+ Southwest

Evra fully recognises the importance of delivering strategic transport infrastructure alongside residential development and supports an appropriate planning mechanism to ensure that housing delivery is aligned with investment in public transport.

However, Evra has significant concerns regarding the proposed Material Alteration which would introduce the following requirement:

“No significant residential development other than infrastructure necessary to facilitate the delivery of strategic transport infrastructure shall commence until DART+ Southwest, or an equivalent rail service, is operational.”

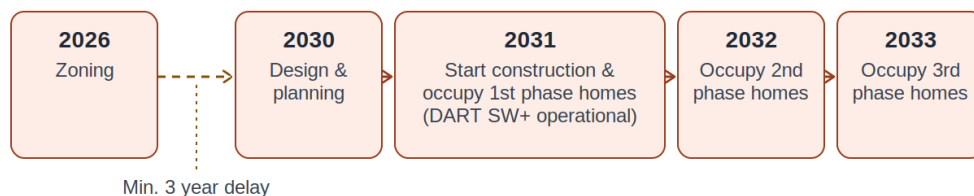
The requirement for DART+ Southwest to be operational introduces a significant development constraint that is dependent upon the completion of a major national infrastructure project, the timing and delivery of which are outside the control of both the Planning Authority and the landowner. Based on the currently published programme for DART+ Southwest, this requirement will sterilise these lands for the duration of the Government’s objective of accelerating housing delivery over the period to 2030.

The graphic below outlines the impact of the linking to the operation of the DART+ Southwest

With DART construction restriction



With DART operation restriction



- With DART construction restriction — complete by 2030
- With DART operation restriction — complete by 2033

Existing and Planned Transport Provision

In order to address concerns raised by SDCC and Elected Members regarding the public transport provision serving Adamstown West, Evra commissioned AtkinsRéalis to undertake a detailed Public Transport Assessment. The assessment concludes that the lands are accessible by sustainable transport and exhibit the key characteristics of Transit-Oriented Development (TOD).

The majority of the lands are located within approximately 15 mins walk of Adamstown Station and within convenient walking and cycling distance of existing schools, retail facilities, community infrastructure and public transport services. The lands are also directly connected to the existing Adamstown SDZ, enabling future development to integrate with an established network of streets, active travel infrastructure, public transport services and community facilities.

Importantly it is also identified that while Adamstown Station forms a key part of the area’s sustainable transport offering, accessibility is not dependent on rail infrastructure alone. The area is also served by high-frequency

BusConnects services, including the C1 and C2 routes, local bus services and an extensive and expanding active travel network.

This public transport offering is also continuing to improve. The NTA is actively planning three additional bus routes originating in Adamstown, with implementation to be phased alongside the delivery of supporting infrastructure. The first section of the primary bus corridor through Clonburris is expected to be operational by the end of 2027, with the full South Link Street corridor expected to be operational by 2029.

We would also note that, in terms of the potential for development to place additional pressure on Newcastle Road, the strategic transport assessment found that the wider Adamstown road network benefits from multiple access points, allowing forecast traffic growth to be distributed across the network rather than concentrated on any single route. Importantly, the modelling exercise did not identify any strategic road network constraints that would prevent the proposed development from being accommodated.

Proposed Alternative

Having regard to all of the above, Evara considers that it is neither necessary nor proportionate to prevent residential development from commencing until DART+ Southwest is operational. Instead, Evara respectfully proposes that the former wording of originally published as part of Proposed Variation No. 2, namely:

"Development may not commence until DART+ Southwest has commenced construction.

Importantly, this approach would enable Evara to commence the delivery of homes within the lifetime of the South Dublin County Development Plan 2022–2028, while also providing greater consistency with the approach applied to the neighbouring Tubber Lands SLO, where residential development is not linked to DART+ Southwest becoming operational.

The distinction between the two triggers is significant. Requiring DART+ Southwest to be operational could defer the commencement of housing at Adamstown West well beyond the current Development Plan period. By contrast, linking development to the commencement of construction provides a robust and measurable infrastructure trigger while allowing housing delivery to proceed in parallel with the delivery of this strategic transport investment.

3. Material Alteration MA2.1 – Adequate Education Capacity

Evara supports the timely delivery of education infrastructure and has no objection to the inclusion of this requirement

4. Material Alteration MA2.2 – Bulk Purchase Restriction

Evara considers that the matters addressed by CS7 SLO13 are already appropriately regulated through the Regulation of Commercial Institutional Investment in Housing: Guidelines for Planning Authorities 2023, issued under Section 28 of the Planning and Development Act.

Evara works closely with AHBs, State bodies and private and institutional investors to deliver a range of housing tenures. In Adamstown this includes the sale of 392 cost-rental homes at The Crossings to the Land Development Agency and 593 private rental units to OCP and DWS. These sales could have proceeded had an SLO of this nature applied to those units.

It is therefore important that local policy does not inadvertently restrict transactions that would otherwise be available in an open market and that Evara can deliver a range of tenures including private and cost rental (facilitating employees with a household income of up to €66,000) to support the local businesses such as Intel, Pfizer and Takeda, all of whom will have employees who require a range of accommodation.

5. Evara is Ready to Deliver

A key point that Evara wishes to emphasise in this representation is that Adamstown West is capable of being delivered in the short term and planning work can be commenced immediately.

Unlike many strategic landholdings, these lands are not speculative, nor are they dependent on third-party land assembly and importantly they are fully serviced. The lands are under Evara's control, directly adjoin our existing developments and represent the natural continuation of the Adamstown SDZ.

Evara already has the delivery platform in place to bring Adamstown West forward. To date, Evara has delivered approximately 3,500 homes in Adamstown, with a further 2,500 homes scheduled for delivery in Adamstown by 2028. Established project teams, contractors and supply chains are actively operating within Adamstown and can transition directly to Adamstown West as the adjoining phases are completed, providing continuity of delivery without unnecessary mobilisation delays.

Significant investment has been made in building experienced delivery teams and establishing the infrastructure and supply chains necessary to deliver homes at scale and at pace. Adamstown West is therefore not simply a strategic landholding with the potential to accommodate housing at some point in the future; it is the natural and deliverable extension of an established community, with the developer, infrastructure, resources and delivery capability already in place to bring forward much-needed homes within the lifetime of the County Development Plan.

Subject to the adoption of Variation No. 2, securing the necessary agreements with South Dublin County Council and obtaining planning permission, Evara is targeting commencement on site in early 2028, with the first homes capable of being delivered to occupiers within approximately 9 to 12 months thereafter.

6. Conclusion

For the reasons set out in this submission and supported by the accompanying independent technical assessments, Evara respectfully requests that the proposed Material Alterations are amended as follows:

1. The proposed requirement linking the commencement of significant residential development at Adamstown West to DART+ Southwest, or an equivalent rail service, becoming operational should be removed, and the SLO should revert to the wording originally published as part of Proposed Variation No. 2, linking commencement of development to the commencement of construction of DART+ Southwest; and
2. The proposed SLO restricting the bulk purchase of residential units should be removed.

Evava considers that the evidence presented in this submission clearly demonstrates that Adamstown West is a sustainable, well-connected and deliverable location for residential development. The lands are well served from both a transport and social infrastructure perspective, directly adjoin the established Adamstown SDZ and can benefit from the significant existing and planned investment in public transport, active travel, schools, community facilities and other supporting infrastructure.

Fundamentally, the purpose of the Minister's call for sites, and the resulting Variation to the County Development Plan, is to identify additional lands capable of contributing to the delivery of much-needed housing within the lifetime of the South Dublin County Development Plan 2022–2028.

Adamstown West can do exactly that.

Evava has an established track record of delivering large-scale residential development and supporting infrastructure within Adamstown. The development teams, technical expertise and delivery structures are already in place to progress Adamstown West as a natural extension of this established community.