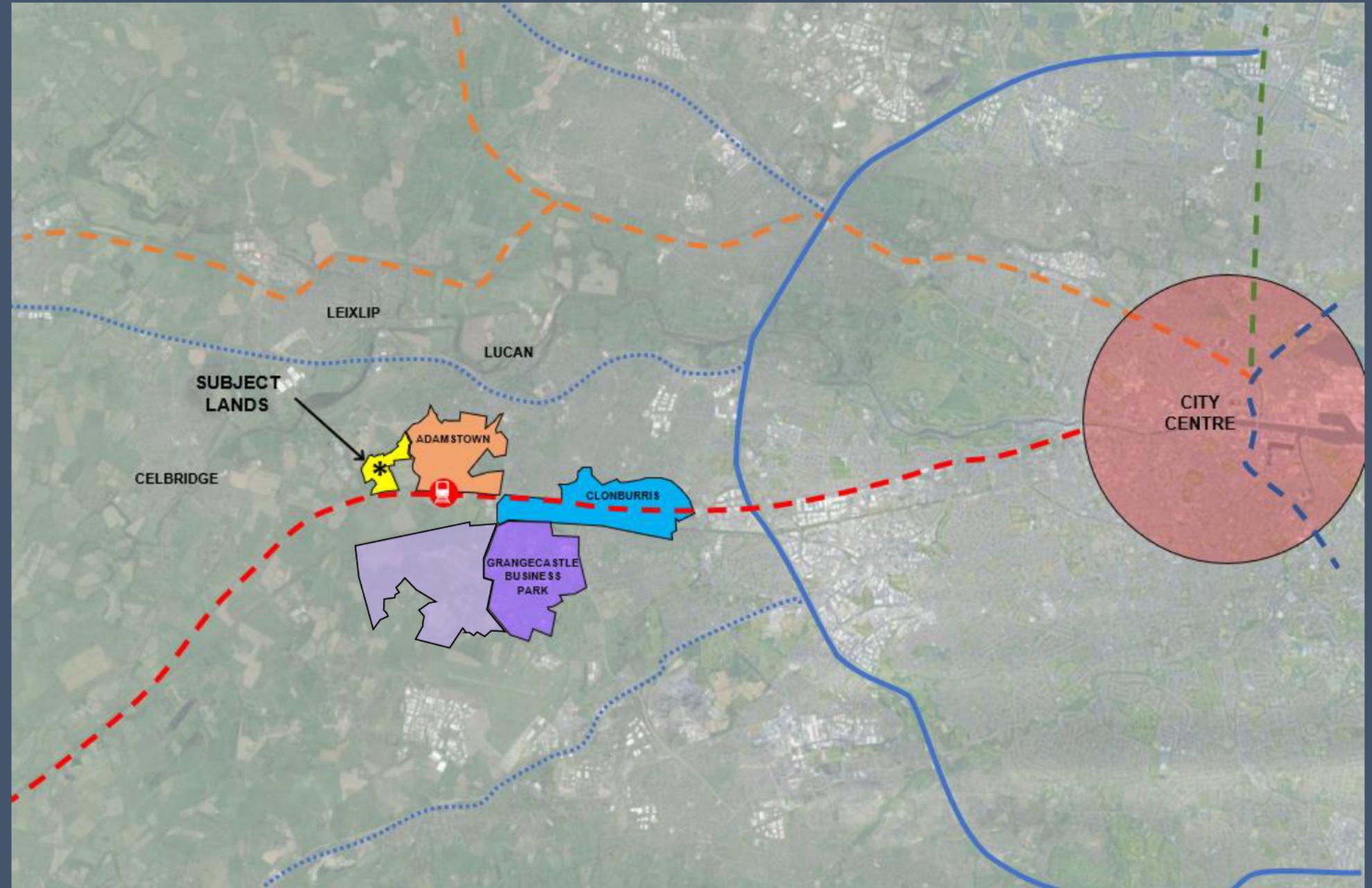


# SUBMISSION ON THE DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 - 2028

In Respect to Lands at Aderrig, Adamstown, Co. Dublin



15<sup>th</sup> September 2021



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John Spain Associates on behalf  
of Hugh McGreevy & Sons & Tierra Ltd.

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**DOCUMENT CONTROL SHEET**

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## 1.0 INTRODUCTION / EXECUTIVE SUMMARY

1.1 On behalf of our client, Hugh McGreevy & Sons and Tierra Ltd, of 223 Mount Prospect Avenue, Clontarf, Dublin 3, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission on the Draft South Dublin County Development Plan 2022-2028 (hereinafter Draft Development Plan), specifically in relation to our client's landholding at Aderrig, to the west of Adamstown SDZ (Strategic Development Zone).

1.2 The full extent of the lands subject to this submission are outlined in red in Figure 1.

### Summary of Submission Request

1.3 This submission respectfully requests that the subject lands at Aderrig be identified for long term residential development and be designated as a '**Long-Term Strategic and Sustainable Development Site**'<sup>1</sup> as per the definition provided by the Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021 (hereinafter "Draft Development Plan Guidelines, 2021")

#### Submission Request

That the subject lands at Aderrig, as outlined in red on the aerial map at Figure 1, be designated as a '**Long-Term Strategic and Sustainable Development Site**'.<sup>2</sup>

1.4 This designation provides for the identification of lands that have the potential to deliver significant residential development over a timescale greater than a single six-year development plan period. The aim of this designation is to provide the necessary certainty in terms of zoning status required to ensure alignment with long-term planning and investment in water services, transport and other infrastructure.

#### Document Structure

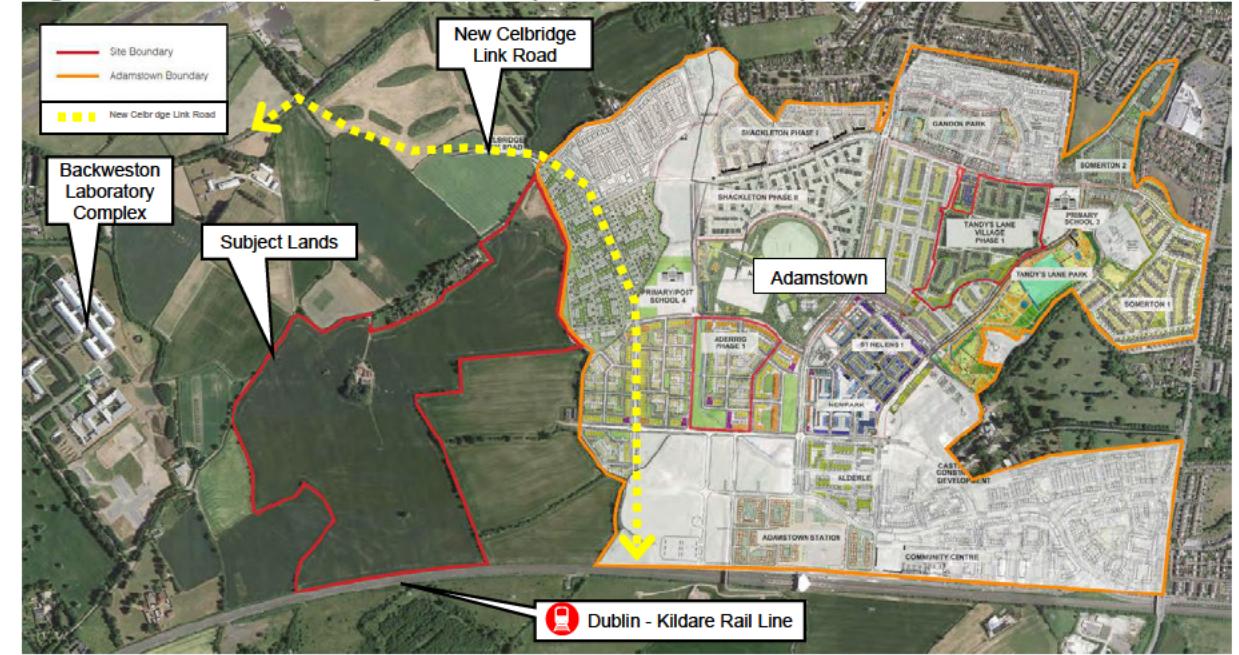
1.5 This report sets out the suggested amendments to the Draft Development Plan written statement and maps, an overview of the site location and context, followed by the rationale for the proposed amendments and the technical appendices.

#### Key considerations

1.6 In support of our request, we ask that the following key points be noted:

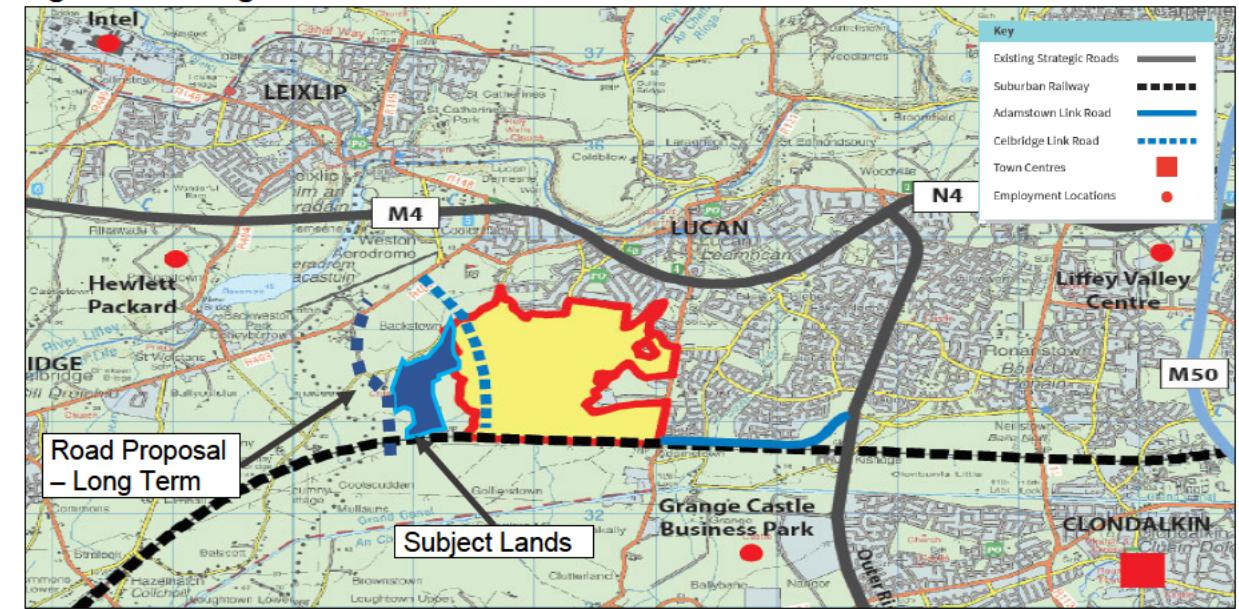
- The lands are **strategically located** immediately west of Adamstown SDZ along the '**South-West Corridor**', identified in the EMRA RSES as forming part of the Metropolitan Area Strategic Plan (MASP) where strategic residential and employment development is to be targeted in order to achieve compact sustainable and sequential growth.
- The lands are **located on the Dublin to Kildare Rail Line**, which is part of the DART+ Programme to deliver electrified services from Hazelhatch / Celbridge to the City Centre.
- The lands form a **natural and logical extension** of the Adamstown SDZ area and their future development would **capitalise on the significant and on-going investment** in physical, social and community infrastructure in Adamstown SDZ area.
- The lands **offer a strategic land bank for the medium to long term delivery of residential development** within SDCC and indeed the Dublin Region.

Figure 1: Location of Subject Lands (site outlined in red)



Source: Davey Smith Architects and JSA

Figure 2: Strategic Context



Source: Davey Smith Architects

- By the inclusion of the subject lands, the **Adamstown SDZ could deliver on the original target of 10,150 residential units** for which capacity was reduced to 8,905 units in 2014 and subsequently increased to only 9,395 units, which would indicate that capacity exists within the planned infrastructure to cater for the development of the subject lands.
- The lands are **ideally positioned close to the Grange Castle Business Park**, a strategic employment development area along the Kildare rail line specifically identified in the MASP, where **high-tech manufacturing, research and development** is to be promoted.
- The lands can contribute to South Dublin County Council's vision of **transitioning to a low carbon and climate resilient society**.

<sup>1</sup> Defined by Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.56

<sup>2</sup> Defined by Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.56

## 2.0 SUBMISSION REQUEST

2.1 This submission respectfully requests that the lands at Aderrig, as outlined in red in the aerial view and map presented at Figure 1 and 2, be identified for strategic long term development as outlined above to contribute to the future housing to be delivered in the County in accordance with the RSES and the MASP.

2.2 The Eastern and Midland Regional Spatial and Economic Strategy 2019 – 2031 (RSES) envisages South Dublin County to grow by an additional 50,233 persons from 2016 to 2031. For South Dublin County up to 2028, the targeted population growth is an additional 46,518 persons. Part of the RSES growth strategy is to deliver sustainable growth of the Dublin Metropolitan area (DMA) through the Dublin Metropolitan Area Strategic Plan (MASP), the 12 to 20-year strategic planning and investment framework.<sup>3</sup>

### Submission Request 1 – Core Strategy and Settlement Strategy

That the lands at Aderrig, as outlined in red in the aerial view and map presented at Figure 1 and 2, be designated as a 'Long-Term Strategic and Sustainable Development Site'.<sup>4</sup>

2.3 The **Draft Development Plan Guidelines 2021**, which the new Development Plan should have regard to, recognise that it may be **necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand**. In this regard, the Draft Development Plan Guidelines 2021 state that the planning authority, after identifying the site/land requirements to meet the housing supply target for a settlement "may also identify additional sites/lands as to ensure sufficient choice for development potential is safeguarded"<sup>5</sup>

2.4 Additional residential zoned lands would be classified as either being likely to be developed within the six-year plan period or not likely to be developed within the six-year plan period. Lands likely to be developed within the plan period are deemed "Additional Provision" and shall not exceed 20-25% of the required quantum of zoned land in any planning authority area as a whole, for any six-year plan period.<sup>6</sup>

2.5 For lands that are not likely to be developed within the six-year plan period the Draft Guidelines propose identification by a 'Long-Term Strategic and Sustainable Development Site' designation. These lands can be considered as further additional provision over and above the 20-25% threshold of the lands included under "Additional Provision" above.<sup>7</sup>

2.6 The 'Long-Term Strategic and Sustainable Development Site' designation expressly provides for the identification of lands that have the potential to deliver significant residential development over a timescale greater than a single six-year development plan period to provide the necessary certainty in terms of zoning status required to ensure alignment with long-term planning and investment in water services, transport and other infrastructure. We respectfully submit that the subject lands fulfil the identified criteria and should be designated for long term strategic and sustainable development.

2.7 We note that the Draft Development Plan already provides for long term development in limited circumstances, with lands identified for strategic long term development potential within the Strategic Development Zones (SDZs) and zoned regeneration areas to provide a strategic quantum of development for South Dublin along existing and planned rail corridors which are identified as key residential and employment growth areas within the MASP.<sup>8</sup>

2.8 In this regard we submit that the capacity stated as being available within the Adamstown SDZ as set out in Table 8 of the Draft Development Plan appears to be overstated. Table 8 states that there is 80 hectares available however the 2020 Amendment to Adamstown SDZ stated that the undeveloped area at that time comprised only 60 hectares.<sup>9</sup>

2.9 In addition, the available capacity has been further reduced by the residential development which has been brought forward in 2021. According to our client's sources, the pace of construction within the SDZ increased in 2021 and a more realistic estimate of available capacity within the SDZ is 7.5% with Adamstown Boulevard (11.5 hectares) the only part not active at present. This would suggest that the entire SDZ will be completed within the lifetime of the new development plan.

### Proposed Amendments Draft Development Plan 2022-2028 - Written Statement

2.10 We respectfully request that the written statement be updated to facilitate the long term development of the subject lands and to address the shortfall in stated capacity within the Adamstown SDZ lands as follows:

- text be updated as outlined in red below to include the 'Long-Term Strategic and Sustainable Development Site' designation,
- Table 8 be updated to reduce stated capacity for Adamstown SDZ and to include the subject lands as shown in *Figure 3: Proposed amended Draft Development Plan 2022-2028 Table 8* set out at below.

### Submission Request 2 – Section 2.6.1 Land Capacity Study

#### Strategic Long Term Development Areas (SDAs)

As indicated above, South Dublin County has strategic long term development potential within the Strategic Development Zones (SDZs), **including identified Long-Term Strategic and Sustainable Development Sites** and zoned regeneration areas. These areas provide a strategic quantum of development for South Dublin along existing and planned rail corridors which are identified as key residential and employment growth areas within the Metropolitan Area Strategic Plan. Table 8 below illustrates the full capacity of these lands:

Figure 3: Proposed amended Draft Development Plan 2022-2028 Table 8 (amended text in RED)

Table 8: Total Land Capacity within Strategic Development Areas

Settlement	Strategic Development Areas (SDAs)	Overall Unit Capacity	Total Land (Hectares)	
			Brownfield	Greenfield
Dublin City and Suburbs (Within and Contiguous)	Adamstown SDZ Planning Scheme	5,240 <b>TBC</b>	0	60 (max – TBC)
	Clonburris SDZ Planning Scheme	7,730 – 11,098	0	252
	Naas Road lands	*	267	13
	Tallaght Local Area Plan (Regen Lands)	8,400 - 11,144	108	0
	<b>Aderrig lands</b>	<b>1,780</b>	0	45
Sub-Totals of SDAs		-	375 (50%)	370 (50%)
<b>Totals</b>		<b>23,150 – 29,262</b>	<b>745</b>	

\* Final figure will be subject to the Naas Road Framework Plan.

Source: Draft Development Plan 2022-2028 with JSA edits.

<sup>3</sup> Draft South Dublin County Development Plan 2022-2028, pg. 35

<sup>4</sup> Defined by Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.56

<sup>5</sup> Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.54

<sup>6</sup> Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.55

<sup>7</sup> Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.56

<sup>8</sup> Draft South Dublin County Development Plan 2022-2028, pg. 46

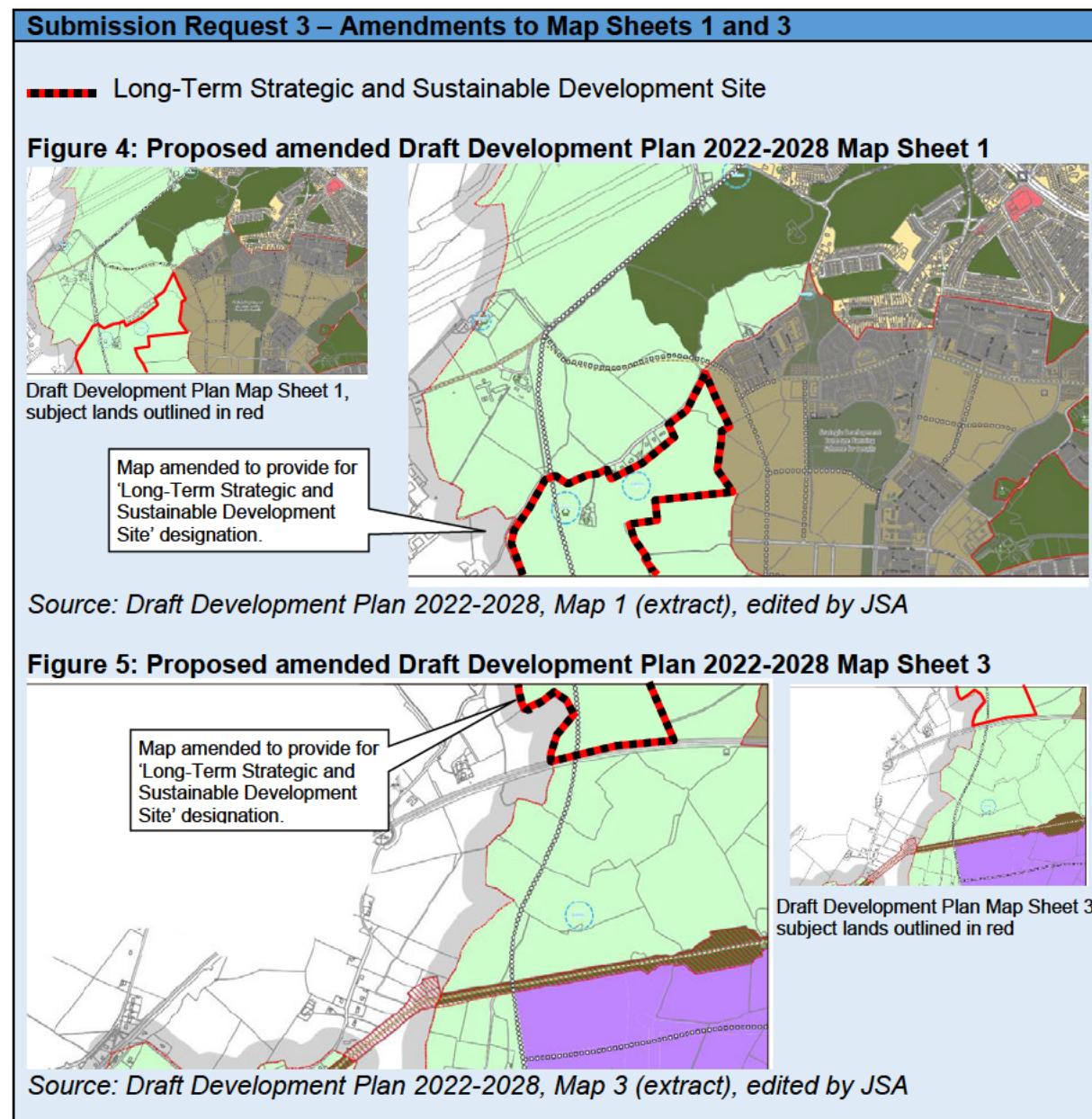
<sup>9</sup> "There are approximately 60 hectares yet to be developed on the SDZ lands", 2020 Amendment to Adamstown SDZ, pg.32

## Proposed Amendments Draft Development Plan 2022-2028 – Map Sheets

2.11 The subject lands at Aderrig, are outlined in red with a black dashed line on the extract from the Draft Development Plan Map Sheets 1 and 3 presented at Figure 2 and Figure 3 below. As shown on the maps, the subject lands are zoned 'Objective 'RU - To protect and improve rural amenity and to provide for the development of agriculture' in the Draft Development Plan 2022-2028.

2.12 This submission requests that the subject lands be designated as a 'Long-Term Strategic and Sustainable Development Site'.

2.13 It is therefore respectfully requested that Draft Development Plan maps be updated to incorporate a new objective in the legend to provide for the 'Long-Term Strategic and Sustainable Development Site' designation and that the lands be identified as same on Map Sheet 1 and Map Sheet 3 as shown in Figure 4 and Figure 5 below.

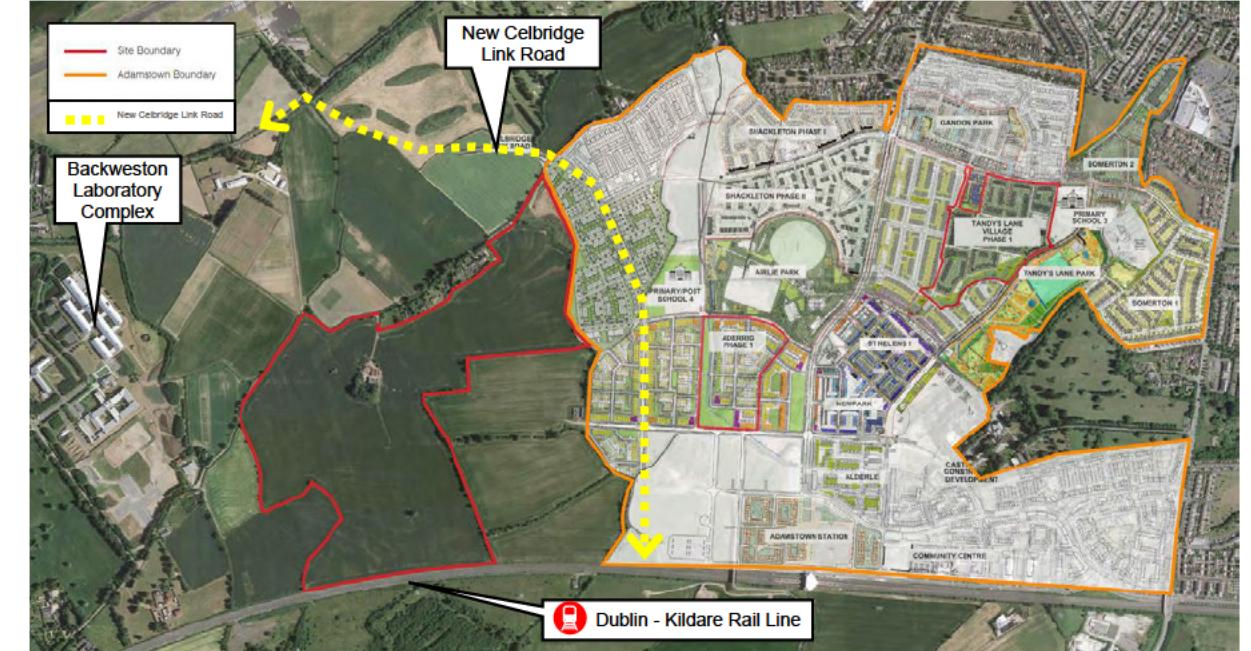


## 3.0 SITE LOCATION AND CONTEXT

3.1 This submission relates to lands under our client's ownership to the west of Adamstown SDZ (Strategic Development Zone) at Aderrig, Adamstown, approximately 1.2km to 1.4km from Adamstown train station. The lands are located approximately 12 kilometres to the west of Dublin city centre, and 1.8km to the south west of Lucan. They are bound to the east by Adamstown SDZ, to the south by the Kildare rail line, to the north and west by Tubber Lane Road and to the south west by greenfield lands. Grange Castle Business Park strategic high-tech manufacturing, research and development employment development area is located c. 2.2 km to the south east of the subject lands.

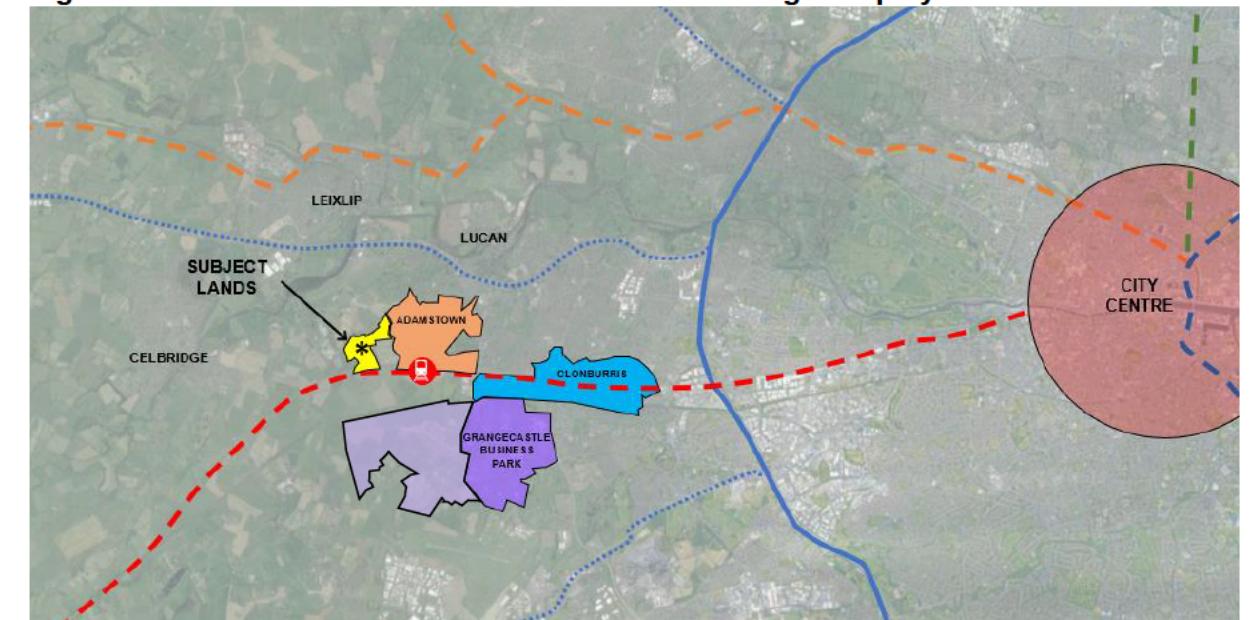
3.2 The full extent of the lands, subject to this submission, are outlined in red in Figure 6 below.

**Figure 6: Location of Subject Lands (site outlined in red)**

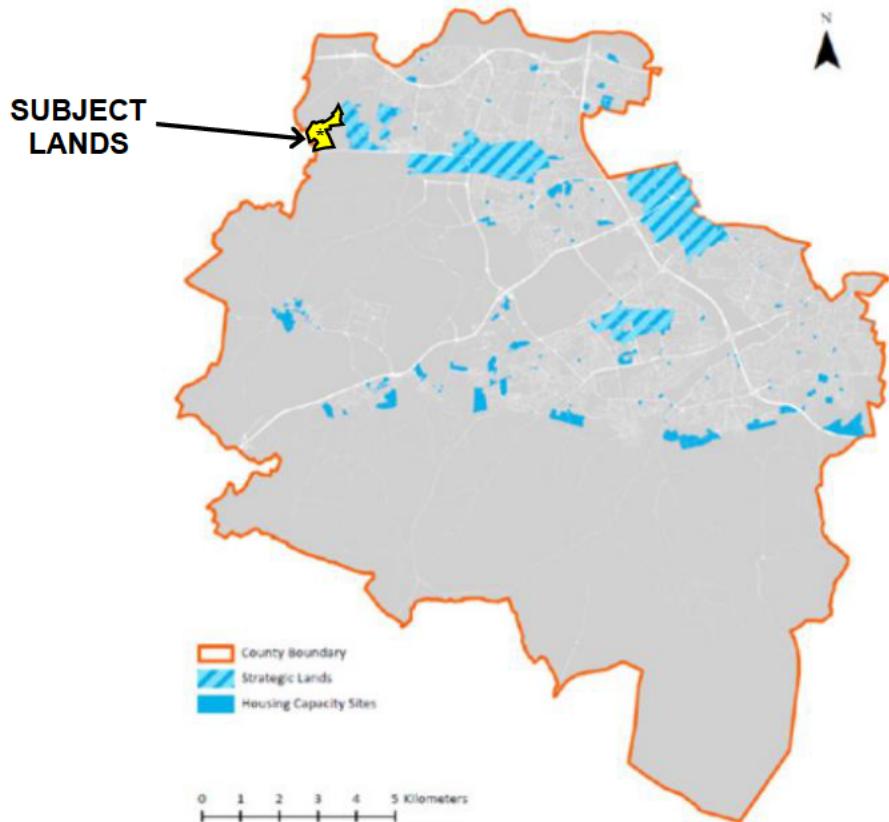


Source: Davey Smith Architects

**Figure 7: Site location relative to SDZ lands and strategic employment area**

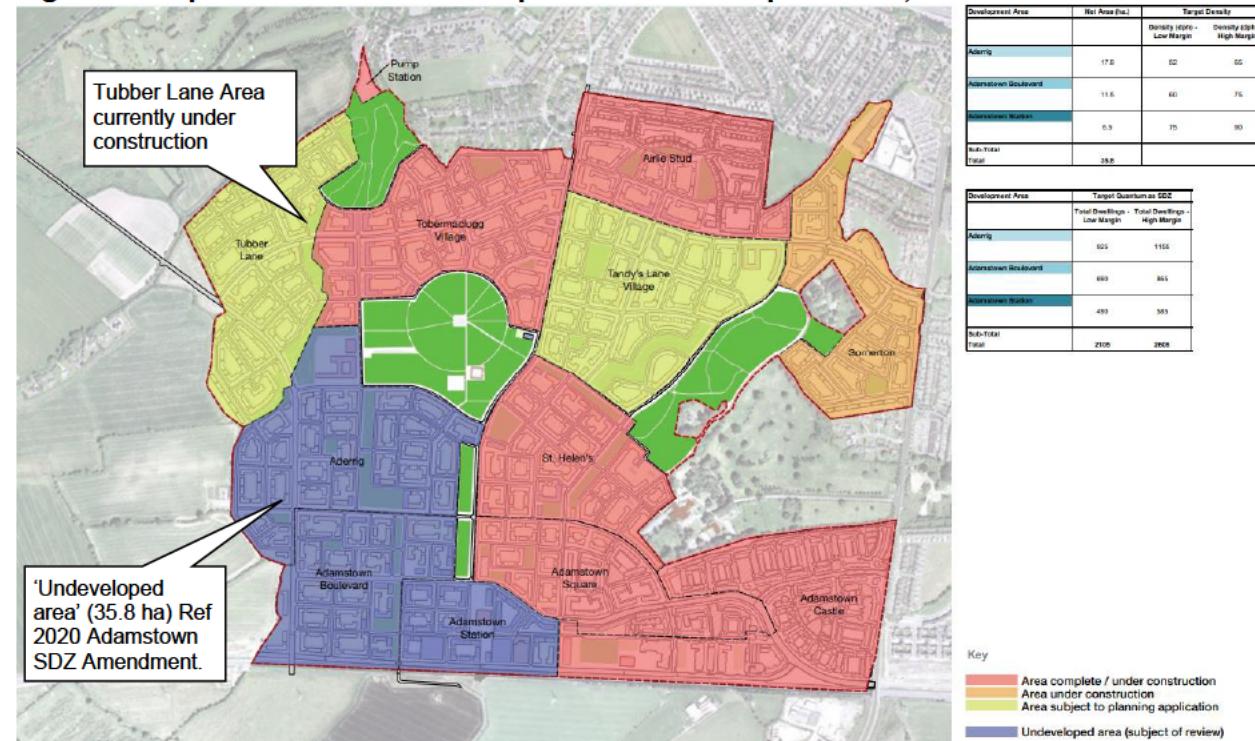


**Figure 8: Site Location in context of identified strategic lands and housing capacity sites**



Source: Draft Development Plan 2022-2028, Figure 9, Housing Capacity Sites

**Figure 9: Map of Adamstown developed and undeveloped areas, 2020**



Source: 2020 Amendment to Adamstown SDZ, Appendix 6

3.3 As outlined above, the subject lands are located to the west of Adamstown, a new community the development of which commenced in early 2000 on the western edge of Dublin city and within the boundaries of South Dublin County Council. Adamstown provides a range of amenities including a community college, primary schools, creches, cafes and retail facilities.

3.4 The development of the SDZ lands is at an advanced stage, with several developers on site, and a number of recent planning permissions granted under the Planning Scheme. As set out in the map extract from the 2020 Amendment to Adamstown SDZ, of the 11 separate development areas 6 have either been completed or have begun construction on site (at least in part) and a further 2 had begun the planning application process, leaving only 3 undeveloped areas, namely Aderrig, Adamstown Boulevard, and Adamstown Station (coloured blue on the map at Figure 9).<sup>10</sup>.

3.5 The development of the SDZ lands to the east will incorporate significant physical and social infrastructure and amenities, including high quality open spaces, retail / district and local centre facilities, along several schools – all located on a high-quality public transport corridor. Elements of the infrastructure and amenities to be provided within the SDZ area are in place at present, including 2 no. schools Adamstown Educate Together and St. John the Evangelist, Adamstown.

3.6 The general environs of the subject site comprise an area undergoing rapid transition, including additional links to high quality public transport provision in the form of bus services and the Dublin to Kildare Rail Line, which is part of the DART+ Programme to deliver electrified services from Hazelhatch / Celbridge to the City Centre. The Celbridge Link Road which is currently under construction is immediately to the east of the lands and links the site to the Celbridge interchange on the M4 motorway. In addition, there is a proposed long term outer ring roads objective noted in the South Dublin County Council (SDCC) zoning objective mapping which traverses the site as shown on the extracts from Map Sheets 1 and 3 presented on Figures 4 and 5 above.

#### 4.0 RATIONALE FOR REQUESTED AMENDMENTS TO THE DRAFT CDP

4.1 Section 1 and 2 have provided details of the requested amendments to the Draft Plan and the following provides the supporting planning rationale for same.

##### Core Strategy and Settlement Strategy

4.2 The Draft South Dublin County Development Plan 2022-2028 Core Strategy states that a key element of the vision for the future development of the County up to 2028, is compact growth, with an emphasis on residential development integrated with existing and planned public transport and the delivery of social and physical infrastructure. The stated overall aim is for the delivery of successful and sustainable communities within the County over the lifetime of this Plan and beyond.<sup>11</sup>

4.3 As set out in the submission made by the Office of the Planning Regulator's (OPR) on the Issues Paper for the new South Dublin County Development Plan 2022-2028, the formulation of the Core Strategy is the most significant element in the planning authority's draft development plan and should be guided by the Draft Development Plan Guidelines and the Housing Need Demand Assessment (HNDA) guidance published in April 2021.<sup>12</sup>

4.4 The Core Strategy and Settlement Strategy outlines that, to provide for the level of growth in line with National policy, an identified need for 23,730 new homes between the Census year 2016 to 2028 within the County and when units completed between 2017 and 2021 (5,914 Units) are disregarded there is an overall requirement of 17,817 units between 2021 and 2028.<sup>13</sup>

<sup>10</sup> 2020 Amendment to Adamstown SDZ, Appendix 6, pg.6

<sup>11</sup> Draft South Dublin County Development Plan 2022-2028, pg. 28

<sup>12</sup> OPR submission new South Dublin County Development Plan 2022-2028 Issues Paper, pg.2

<sup>13</sup> Draft South Dublin County Development Plan 2022-2028, pg. 28

4.5 However, with regard to the above, we respectfully submit that Appendix 11, South Dublin Housing Strategy and Interim HNDA 2022 – 2028, be reviewed as it does not have regard to the Housing Needs and Demand Assessment (HNDA) Guidelines which were published on the 14<sup>th</sup> April 2021 and the housing targets within the report and succeeding Core Strategy and Settlement Strategy relate to ESRI 50:50 Scenario published by the Department in December 2020 which have been superseded by the new guidance.<sup>14</sup>

4.6 The Draft County Development Plan states that it is tasked with ensuring that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the projected population and to ensure that a scarcity of such land does not occur at any time during the period of the Development Plan.<sup>15</sup> The Land Capacity Study of existing undeveloped zoned land estimates that, at an average yield of 50 units per hectare, there is an estimated potential for 23,730 units on 477 hectares of developable land within the lifetime of the Development Plan period. Based on the housing capacity of existing undeveloped zoned land in South Dublin County, the Draft County Development Plan concludes that there is no requirement to zone additional land to serve the needs of population and housing targets<sup>16</sup>

4.7 We respectfully submit that this approach will further exacerbate housing shortage issues and should be reviewed. By basing the decision on the quantum of residential lands to be zoned solely on the housing capacity of existing undeveloped zoned land, the Planning Authority fails to take into account their own findings in relation to other factors which affect housing delivery clearly set out in the Draft County Development Plan such as:

- Development challenges associated with brownfield lands, including contamination, landownership and site assembly, phasing and sequencing.
- The fact that approximately half (51%) of sites with permission are activated at any given time while the remainder may take time to commence based on a range of factors (e.g. raising of funding, potential market changes) or that permissions may not be implemented at all during their lifetime.<sup>17</sup>
- Larger developments (SHDs) comprise a significant element of permitted units throughout the County and since commencement of the SHD process in 2017 delivery has been limited with only 11% of the permitted SHDs being implemented up to Q3 2020.<sup>18</sup>
- The development of the existing identified strategic lands will require significant investment and site assembly to enable the full development potential and this will take time.<sup>19</sup> In this regard, it is noted that the Strategic Development Zone lands at Clonburris have at least a 10 to 15 year delivery timeframe to completion.

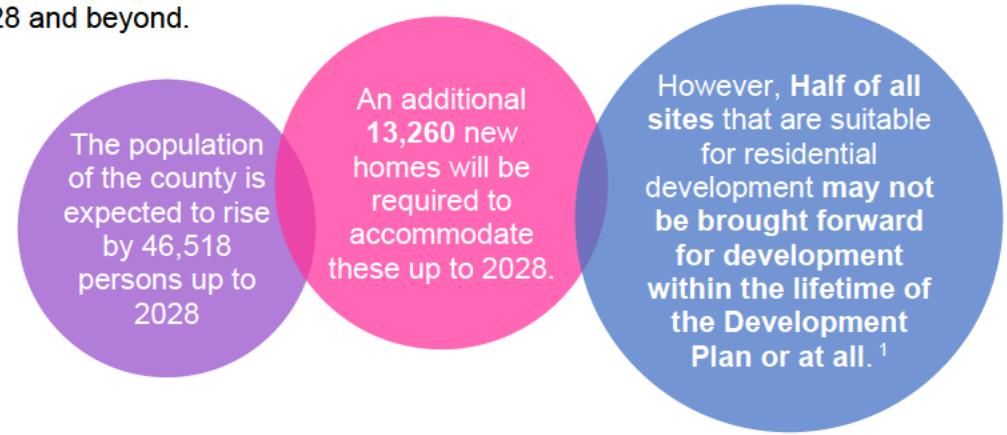
4.8 In addition to the above, it is unclear how the Planning Authority can conclude that 23,730 units could be potentially delivered over the next 6 years on the same lands zoned since 2016 when the annual rate of construction between 2017 and 2020 inclusive was on average 1,479 units a year within the last three years averaging 1,644 units. Even at the higher output rate, this equates to less than 10,000 units over 6 years.

4.9 Furthermore, we note that an Infrastructural Assessment of the available developable lands was undertaken to inform the Development Plan review to differentiate between; i) zoned land that is serviced (Tier 1) and ii) zoned land that is serviceable within the life of the Plan (Tier 2) and that this assessment determined that all existing zoned lands with potential to deliver homes could be categorised as either Tier 1 or Tier 2 lands in line with the NPF criteria capable of facilitating a potential total of 23,730 units.

4.10 However, we also note CS3 Objective 5, the aim of which is 'to create and maintain a data base of land zoned for residential development that has not yet been developed including, where

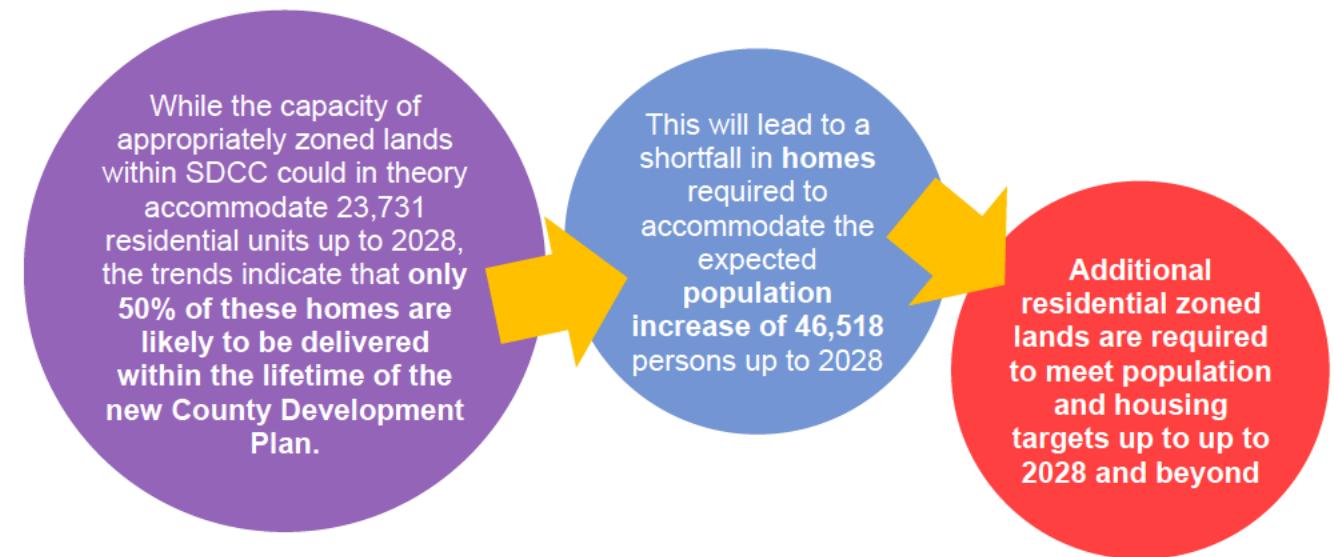
available, information on why this land has not been developed so as to inform future zoning and de-zoning decisions.'<sup>20</sup> In light of this, we would question the reliability of the infrastructural assessment and land capacity studies given that the information set out under CS3 Objective 5 is clearly not known.

4.11 It is respectfully submitted that the housing need for the County up to 2028 will not be met without the zoning of additional lands for residential development in the new County Development Plan and additional residential zoned lands are required to meet population and housing targets up to up to 2028 and beyond.



4.12 As outlined above, due to a range of factors including market forces, permission sought to increase land value for re-sale, issues with sourcing the appropriate level of funding to commence construction and capacity of construction industry, the evidence shows that **half of sites (51%) with planning permissions in South Dublin County Council have not commenced.**<sup>21</sup>

4.13 As outlined in the Ernest Young Economic Case for Zoning Aderrig Lands – Key Issues Draft Paper attached at Appendix 4, past experience suggests that that when the quantum of residential zoned land is limited, developers will compete for the sites that are available, creating higher land prices. In a scenario of higher land prices due to limited supply, availability of affordable housing is impacted, leaving potential house buyer demand unmet. To ensure continuity of housing supply, on a stable profile, local authorities need to ensure there is an ongoing supply of suitably zoned lands in the right locations. Making land available at the time housing is required is too late.



4.14 With regards to the Draft Development Plan Guidelines 2021, we note that these were published after publication of the Draft Development Plan. As outlined by the OPR in their pre-draft

<sup>14</sup> Appendix 11, South Dublin Housing Strategy and Interim HNDA 2022 – 2028, pg.6

<sup>15</sup> Draft South Dublin County Development Plan 2022-2028, pg. 45

<sup>16</sup> Draft South Dublin County Development Plan 2022-2028, pg. 48

<sup>17</sup> Draft South Dublin County Development Plan 2022-2028, pg. 52

<sup>18</sup> Draft South Dublin County Development Plan 2022-2028, pg. 52

<sup>19</sup> Draft South Dublin County Development Plan 2022-2028, pg. 47

<sup>20</sup> Draft South Dublin County Development Plan 2022-2028, pg. 58

<sup>21</sup> Draft South Dublin County Development Plan 2022-2028, pg.42

submission, SDCC must be guided by the Draft Development Plan Guidelines and we respectfully request that SDCC review same and have particular regard to the following excerpts from Section 4- Core Strategy:

Draft Development Plan Guidelines (extract)	
<i>"4.4.3 Ensuring Sufficient Provision of Housing Lands/Sites</i>	
<p><i>In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.</i></p> <p><i>Where the planning authority considers it necessary to employ this mechanism for 'Additional Provision' of residential lands in a particular settlement, it must be clearly set out in the core strategy. In proposing the extent of any such additional landholdings, the planning authority must take into consideration all of the following:</i></p>	
<p>a) <i>There is no automatic presumption of Additional Provision land or sites to meet housing supply targets in any development plan. The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period;</i></p> <p>d) <i>Any parts of strategic and sustainable development sites that will be phased and built out over a longer period than the six-year development plan (such as large-scale urban regeneration areas, transport-led development sites or SDZs) may be included over and above as Additional Provision lands (per section 4.4.4 below);</i><sup>22</sup> (emphasis added)</p>	
<i>"4.4.4 Long-Term Strategic and Sustainable Development Site</i>	
<p><b>Strategic and Sustainable Development Sites are key development sites that may comprise lands and sites for urban regeneration and/or transport-led development. They may comprise either brownfield/infill or greenfield land and may also be subject to Strategic Development Zone (SDZ) status, or other relevant planning-related designation. Such sites are characterised by:</b></p> <ul style="list-style-type: none"> <li><b>their potential for significant residential development to be delivered over a timescale greater than a single six-year development plan period</b></li> <li><b>their significant scale – generally several thousand new homes as a new urban extension to a City or NPF Regional Centre</b></li> <li><b>A requirement to be aligned and supported by significant water services, transport and other infrastructural investment. The extended timescale needed to deliver such infrastructure will require certainty in terms of zoning status to ensure such long-term planning and investment.</b></li> </ul> <p><b>It is necessary for the development plan core strategy to clearly identify such lands and also the proportion of those land that are likely to be developed within the six-year plan period and those that are not likely to be developed within the six-year plan period. While the portion of lands likely to be developed must be included in the plan core strategy, the portion that are 'not likely' to be developed within the plan period should be identified by a 'Long-</b></p>	

**Term Strategic and Sustainable Development Site' designation, reflecting that they will deliver housing within the subsequent development plan period (ie. more than 6 years).**

*This is to ensure clarity in respect of scheduled housing development on the site in accordance with identified phasing and servicing constraints for the planning authority or An Bord Pleanála when considering any planning applications for housing development. The portion of any Long-Term Strategic and Sustainable Development Sites that are not likely to be developed within the six-year plan period may be considered as further additional provision over and above the 20-25% threshold figure referred to above.*<sup>23</sup> (emphasis added)

4.15 The above extracts highlight the critical need for the identification of long term residential development lands to provide the certainty required to ensure investment in water services, transport and other infrastructural investment are aligned. As outlined in the timeline attached at Appendix 3, Adamstown was first designated for residential development in 1998 (23 years ago). Therefore, as evidenced by the delivery of the Adamstown SDZ, where it is estimated that it will take at least another 3 years, i.e. up to 2024 (in reality probably closer to 6 years coinciding with the duration of the new CDP), to complete meaning that it will have taken approximately 26 years to deliver on the 9,000 residential units, it is apparent that the Planning Authority need to consider a 10 to 20-year timeframe when designating substantial new growth areas within the County.

4.16 Furthermore, we submit that the above, in addition to the 2010 Guidance Note on Core Strategies which acknowledges that planning authorities can identify strategic long-term (i.e. 10 to 15+ year) development areas, provides a clear policy direction and a mechanism for the designation of additional residential zoned lands both within the six year development plan period and beyond.

4.17 Therefore, it is respectfully submitted that the identification of the lands at Aderrig as a 'Long-Term Strategic and Sustainable Development Site' designation would be appropriate for the subject lands given their strategic location along an identified rail corridor adjoining the Adamstown SDZ where significant infrastructural investment has already been made and given they are likely to be brought forward for development if zoning certainty is provided as they are owned by an active housebuilder.

#### Strategic Location

4.18 The lands are strategically located immediately west of Adamstown SDZ along the South western corridor (western suburbs), an identified strategic corridor set out in the MASP integrated land use and transportation strategy.<sup>24</sup> Key points to note in this regard are as follows:

- Adamstown and adjoining lands are identified in the EMRA RSES as part of the 'South-West Corridor' forming part of the Metropolitan Area Strategic Plan where strategic residential and employment development is to be targeted in order to achieve compact sustainable and sequential growth.
- The lands are located on the Dublin to Kildare Rail Line, which is part of the DART+ Programme to deliver electrified services from Hazelhatch / Celbridge to the City Centre, and therefore new housing in this area would accord with the policy of integrating land use and transportation;<sup>25</sup>
- The lands form a natural and logical extension of the Adamstown SDZ area and their future development would capitalise on the significant and on-going investment in physical, social and community infrastructure in Adamstown SDZ area,
- They offer a strategic land bank for the medium to long term delivery of residential development within SDCC and indeed the Dublin Region;

<sup>22</sup> Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.54

<sup>23</sup> Development Plan Guidelines for Planning Authorities, Draft for Consultation 2021, pg.56

<sup>24</sup> Draft South Dublin County Development Plan 2022-2028, pg. 37

<sup>25</sup> Draft South Dublin County Development Plan 2022-2028, pg. 37

- The future development of these lands would help deliver part of a north – south long-term roads objective of the current Development Plan, which traverses the lands. This road (identified on Draft Development Plan 2022-2028, Map Sheets 1 and 3 above) will provide a future connection between Lucan / Adamstown, the significant employment generating lands at Grange Castle and the M4 / M7 to the north and south respectively;
- They are green-field lands which do not contain any significant constraints in respect to the future delivery of residential development;
- It is considered that due to the significant investment in Adamstown Train Station as part of the Kildare Rail Project and the Adamstown SDZ, and the medium to longer-term objective to deliver a Dart type service from Hazelhatch to the City Centre, that it would be a missed opportunity not to promote a new mixed-use residential community adjacent to Adamstown on the subject lands;
- There is potential to deliver a further rail station on the Celbridge / Hazelhatch to Dublin rail line to serve these future development lands, which would be consistent with the aim to maximise the potential of existing transport corridors such as the Kildare Rail Line electrification as far as Hazelhatch by 2022 as anticipated under the DART Underground project.

4.19 We note that the request made in this submission is aligned with the recommendations of the OPR at pre-draft stage, which noted that the strategy to achieve growth of 1.4 million people in Dublin City and suburbs and 1.65 million people in the Dublin Metropolitan Area (DMA) as set out in the MASP is to be “*through the delivery of large-scale strategic development areas*”<sup>26</sup> and that the OPR advises that “*a significant proportion of the county’s future population growth will need to be directed to:*

- *Naas Road / Ballymount Strategic Development Area, which has potential for residential development and more intensive employment / mixed use*
- **South western corridor (western suburbs)** – SDZ lands and Kilcarbery
- *South western corridor (LUAS red line) – Tallaght Town Centre / Cookstown and Fortunestown / Saggart / Citywest*<sup>27</sup>

Figure 10: Extract from Dublin MASP with Aderrig Lands identified<sup>28</sup>



<sup>26</sup> OPR submission new South Dublin County Development Plan 2022-2028 Issues Paper, pg.3

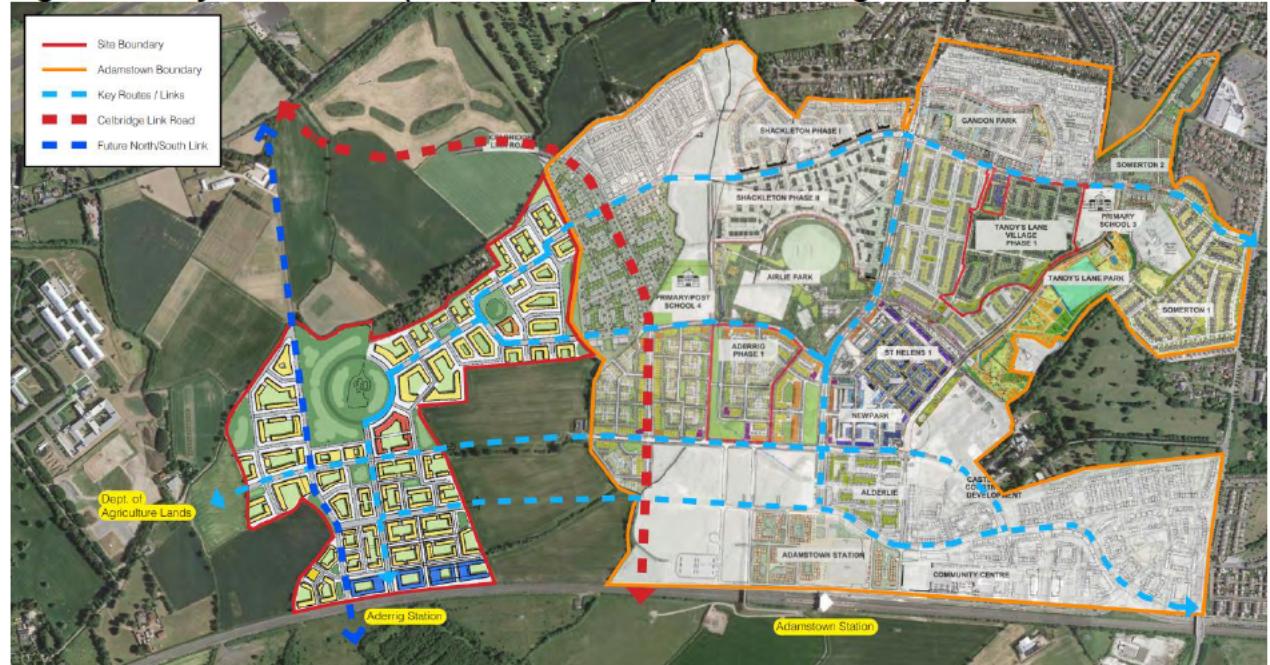
<sup>27</sup> OPR submission new South Dublin County Development Plan 2022-2028 Issues Paper, pg.4

Figure 11: Location of subject lands adjoining Adamstown SDZ



4.20 In respect to this request for a Long-Term Strategic and Sustainable Development Site designation of the Aderrig lands, we note the similar approach proposed by DLRCC in their Draft Plan 2022-2028 in respect to lands at Old Connaught, which are located along the planned Luas extension to Bray. The Strategic Land Reserve in the DLRCC Draft Plan, while it expressly does not confer a zoning status, acknowledges the suitability of lands to cater for future residential development in accordance with NPO 68 of the National Planning Framework. The SLR objective reflects the fact that the lands are well located, adjacent to existing serviced lands, served by existing / planned public transport, and are capable of being developed in the short to medium term. It is respectfully submitted that a similar rationale applies to the Aderrig lands.

Figure 12: Key connections (Indicative Masterplan for Aderrig Lands)



<sup>28</sup> RSES, pg.103

<b>Potential for housing delivery</b>	<b>Contribution to Green Strategy</b>
4.21 The subject lands comprise an area of 45 hectares. At a density of 35-40 units per hectare, <b>the land bank has the potential to provide 1,780 homes in the period 2028 to 2040</b> along a high-quality public transport corridor adjoining the new community of Adamstown. In the context of the increased density target of 52-70 dwellings per hectare set out in the 2020 Adamstown SDZ Amendment for the Aderrig lands to the east, the lands have the potential to provide approximately 2,745 homes at a density of 61 units per hectare. This level of residential would maximise the benefits and return on the significant investment in new physical and social infrastructure and amenities at Adamstown, which includes high quality open spaces, retail / district and local centre facilities and several schools.	4.28 As set out in the Landscape Rationale prepared by Ronan Mac Diarmada and Associates at Appendix 2, the subject lands could contribute towards the biodiversity and Green infrastructure of South Dublin's rural fringe, providing connections to existing regional outdoor spaces to establish an amenity and wildlife corridor between the River Liffey, the subject lands, and surrounding parklands to protect and enhance the ecological profile of the region to enhance Green Infrastructure at the 'Adamstown Link', as outlined in the Draft Development Plan.
4.22 Our client has demonstrated a long term commitment to delivery of Adamstown SDZ from its inception in 1998 through to present day in conjunction with various landowners and collaboration with South Dublin County Council. Our client has a proven track record in master planned sustainable development, including the provision of necessary infrastructure ahead of residential development as evidenced by their involvement with Adamstown SDZ.	5.0 <b>CONCLUSION</b>
4.23 In addition, our client is a multi-generational house builder with a proven ability to deliver much needed housing stock for both the first time buyer and step down market as evidenced by the delivery of Hanstead development during 2011 and 2013, one of only a few developments completed in the South Dublin County Council area within that period. Future development of Aderrig lands would provide a continuation of this approach to housing delivery.	5.1 Our client welcomes the opportunity to make this submission on the Draft South Dublin County Development Plan 2022-2028. This submission is made with the intention of informing the proposed amendments to the Draft County Development Plan in advance of the adoption of the new Development Plan, and to highlight suggested amendments in respect of our client's lands located at Aderrig, to the west of Adamstown SDZ (Strategic Development Zone).
4.24 Other notable high quality homes delivered by our client in the Dublin area include the following: <ul style="list-style-type: none"> <li>• Esker Park- 1979- 1981</li> <li>• Elmbrook- 1991-1993</li> <li>• Ballydowd Manor- 1997-2008</li> <li>• Hansted- 2011-2013 (referenced above)</li> <li>• Hallwell, Adamstown (Tubber Lane)- 2018- to present</li> </ul>	5.2 In summary, this submission respectfully requests that the subject lands at Aderrig be identified for long term residential development designated as a ' <b>Long-Term Strategic and Sustainable Development Site</b> ' as per the definition provided by the "Draft Development Plan Guidelines, 2021".
4.25 At present our client is constructing housing on the Tobermaclugg lands (Hallwell development) in Development Area 5 of the Adamstown SDZ Planning Scheme area and planning to bring forward a planning application for the final phase of development in Q4 2021 (Phase 3).	5.3 As outlined above, this designation would provide the necessary certainty in terms of zoning status required to ensure alignment with long-term planning and investment in water services, transport and other infrastructure and is considered appropriate given that: <ul style="list-style-type: none"> <li>• The lands are <b>strategically located</b> immediately west of Adamstown SDZ <b>along the South-West Corridor</b>, identified in the EMRA RSES as forming part of the Metropolitan Area Strategic Plan (MASP) where strategic residential and employment development including the <b>Grange Castle Business Park</b> where high-tech manufacturing, research and development is to be targeted to achieve compact sustainable and sequential growth.</li> </ul>
	<ul style="list-style-type: none"> <li>• The lands are <b>located on the Dublin to Kildare Rail Line</b>, which is part of the DART+ Programme to deliver electrified services from Hazelhatch / Celbridge to the City Centre.</li> </ul>
	<ul style="list-style-type: none"> <li>• The lands form a <b>natural and logical extension of the Adamstown SDZ</b> area and their future development would <b>capitalise on the significant and on-going investment</b> in physical, social and community infrastructure in Adamstown SDZ area.</li> </ul>
	<ul style="list-style-type: none"> <li>• The lands <b>offer a strategic land bank for the medium to long term delivery of residential development</b> within SDCC and indeed the Dublin Region.</li> </ul>
	<ul style="list-style-type: none"> <li>• By the inclusion of the subject lands, <b>the Adamstown SDZ could deliver on the original target of 10,150 residential units</b> and maximise the planned investment in infrastructure.</li> </ul>
	<ul style="list-style-type: none"> <li>• The lands can contribute to South Dublin County Council's vision of <b>transitioning to a low carbon and climate resilient society</b>.</li> </ul>
4.27 The <b>Long-Term Strategic and Sustainable Development Site</b> designation of the Aderrig lands would provide for an appropriate recognition of the development potential of these lands over the lifetime of the subsequent Development Plan. which are currently well served by infrastructure, and the potential to better integrate residential land use and public transport in the future development of the County in accordance with the National Planning Framework and Eastern and Midland Regional Spatial and Economic Strategy.	5.4 It is respectfully requested that the Planning Authority have regard to the points raised in this submission to ensure that an appropriate planning framework is set out for the provision of residential development and supporting sustainable neighbourhood infrastructure within the operational area of the new Development Plan, and to provide for the appropriate policy framework for our client's lands, who are actively involved in housing delivery in the County.

**Figure 13: Masterplan Proposal**



## 6.0 APPENDICES

**Appendix 1 – POGA Consulting Engineers Infrastructural Services and Capacity**

**Appendix 2 – RMDA Landscape Rationale**

**Appendix 3 – Adamstown SDZ Timeline**

**Appendix 4 – EY - Economic Case for Zoning Aderrig Lands – Key Issues-Draft Paper**

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***Appendix 1 – Poga Consulting Engineers Infrastructural Services and Capacity***

# Aderrig Lands – Infrastructural Services and Capacity – September 2021

## 1.1 Roads & Public Transport

The lands can be serviced by the existing road network constructed as part of the Adamstown SDZ. The lands will also benefit from being served by the proposed long term outer ring roads objective noted in the South Dublin County Council (SDCC) Zoning objective mapping. The Celbridge Link Road (under Construction) which is immediately to the west of the lands links the site to the Celbridge interchange on the M4 motorway.

The lands benefit from being bound by the main western railway line to the south. A new railway station could be provided at the lands, similar to the Adamstown station, to provide a suitable public transport link.

## 1.2 Services

### 1.2.1 Watermain

The lands can be serviced by a 700mm diameter DI truck watermain that passes through the site. The lands also benefit from the as constructed and under construction watermain in the adjoining Adamstown SDZ.

### 1.2.2 Wastewater

The lands can be serviced by the existing wastewater network constructed as part of the adjoining Adamstown SDZ. The adjoining sewer network, under construction as part of the Celbridge Lind road project, has been sized to cater for these lands. The Adamstown SDZ is serviced by an existing pumping station located at Tubbermaclagg adjoining Tubber lane, developed by the landowners to serve Adamstown and immediately adjoining lands. The pumping station has the capacity to pump 354l/s, this equates to an equivalent of 25,000 units at 3 times dry weather flow, or a population equivalent over 67,000 people. Excluding the non-residential development, this exceeds the proposed maximum development of approximately 9,000 units noted in the SDCC Adamstown SDZ planning scheme, December 2014. This leaves ample spare capacity to service these lands.

### 1.2.3 Surface Water

The lands can be serviced by the existing surface water drainage network that currently drains the lands. The lands are currently well drained and are currently under tillage. The outflow from any development will be limited to Greenfield runoff rates as per the Greater Dublin Strategic Drainage Strategy guideline as well as adopting Sustainable Drainage Systems.

## 1.3 Flooding

We have assessed the risk of flooding risk from in three main areas, Coastal, Pluvial and Fluvial. The assessment was carried out by a desk study using information from the Office of Public Works (OPW), SDCC, and information from Floodinfo.ie.

### 1.3.1 Coastal Flooding

The site is located 20+km from the Irish Sea. There is no coastal flood mapping available for the area around the subject site. Due to the elevation of the site and distance from the Sea we conclude the risk of coastal flooding as very low.

### 1.3.1 Pluvial Flooding

Pluvial flooding can be defined as flooding that result from rainfall-generated overland flow, before the runoff enters any watercourse or sewer. It is usually associated with high intensity 'extreme or monster' rainfall events (typically >30mm/h) resulting in overland flow and ponding in depressions in the topography. In urban situations underground sewerage/drainage systems and surface watercourses may be completely overwhelmed.

The lands are well drained and there is NO pluvial flooding noted on these lands; therefore we would consider the risk from pluvial flooding as very low.

### 1.3.1 Fluvial Flooding

Fluvial flooding occurs when rivers and streams break their banks and water flows out onto the adjacent low-lying areas (the natural floodplains). This can arise where the runoff from heavy rain exceeds the natural capacity of the river channel, and can be exacerbated where a channel is blocked or constrained or, in estuarine areas, where high tide levels impede the flow of the river out into the sea.

The OPW fluvial flood mapping notes NO fluvial on these lands refer to figure 1.3 below.

Any future development on the lands would be subject to a flood risk assessment, however, it is apparent from the above that the lands can be classified as Flood Zone C under the Flood Risk Management Guidelines 2009 and suitable for all forms of development.

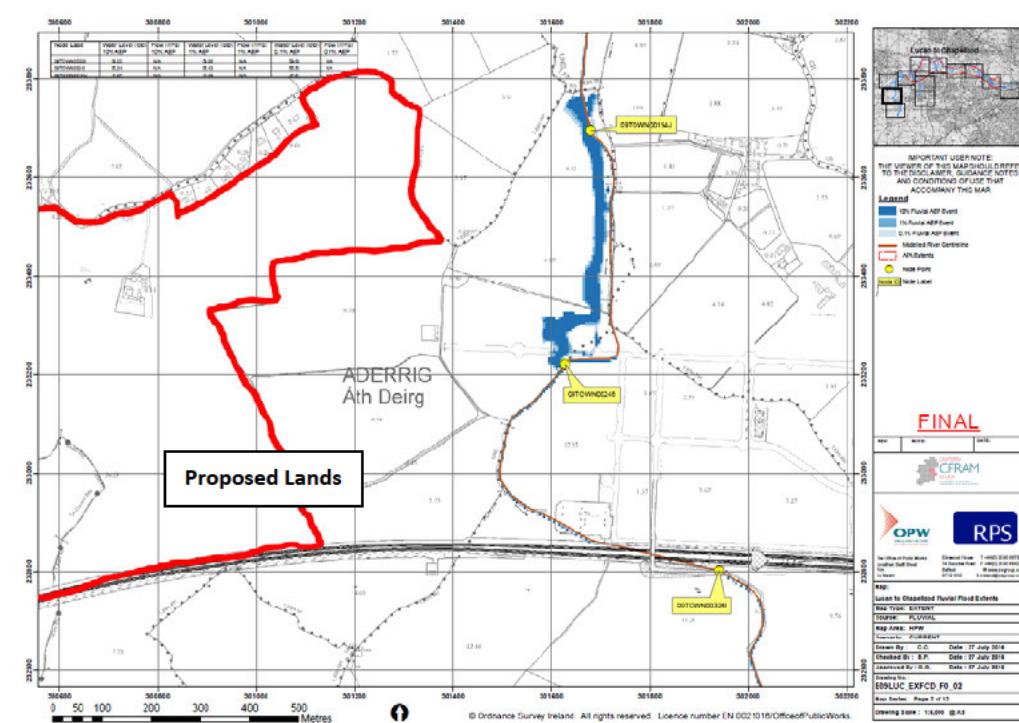


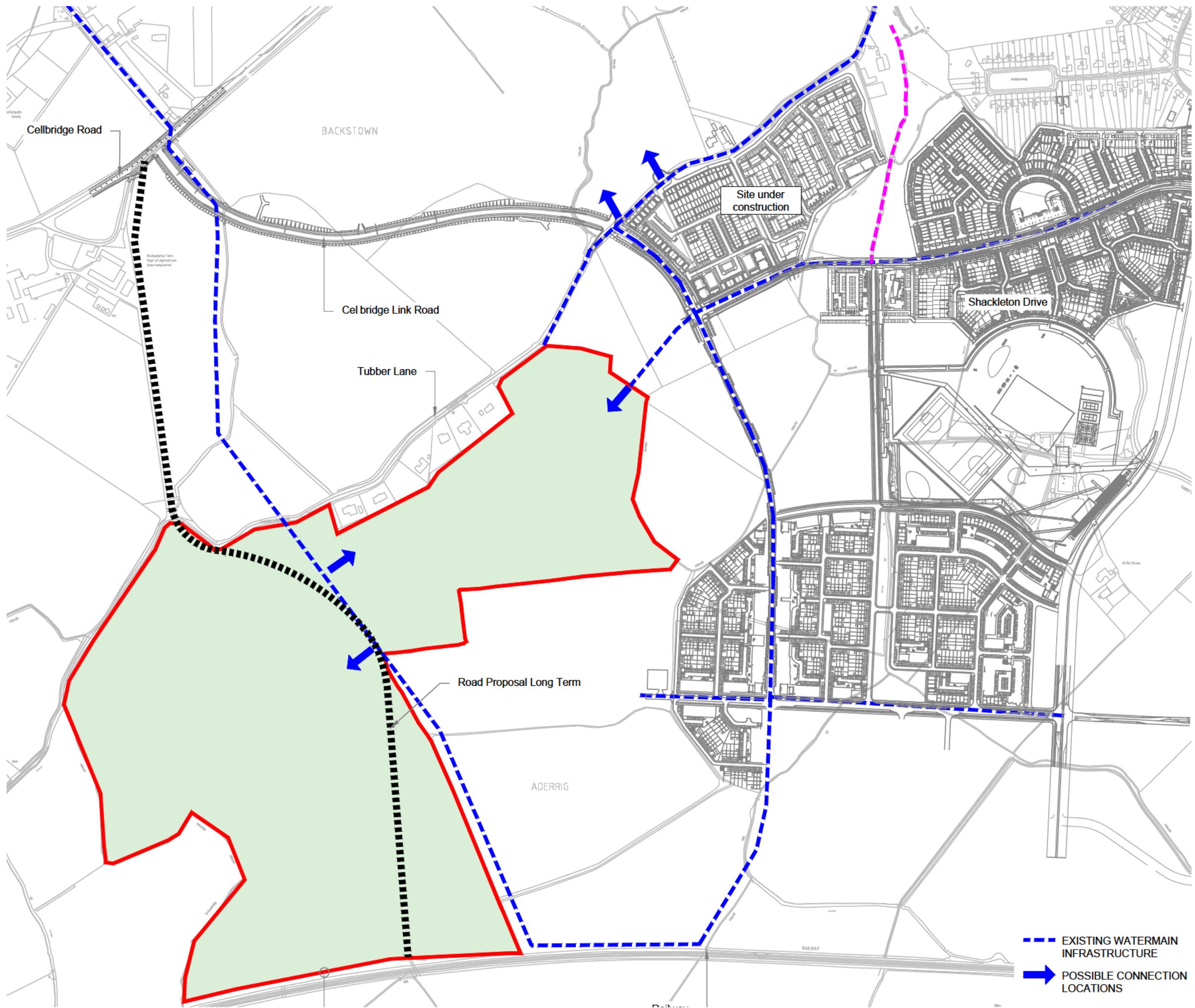
Figure 1.3 OPW – Lucan to Chapelizod Fluvial Flood Extent mapping

## Aderrig Lands – Infrastructural Services and Capacity – September 2021

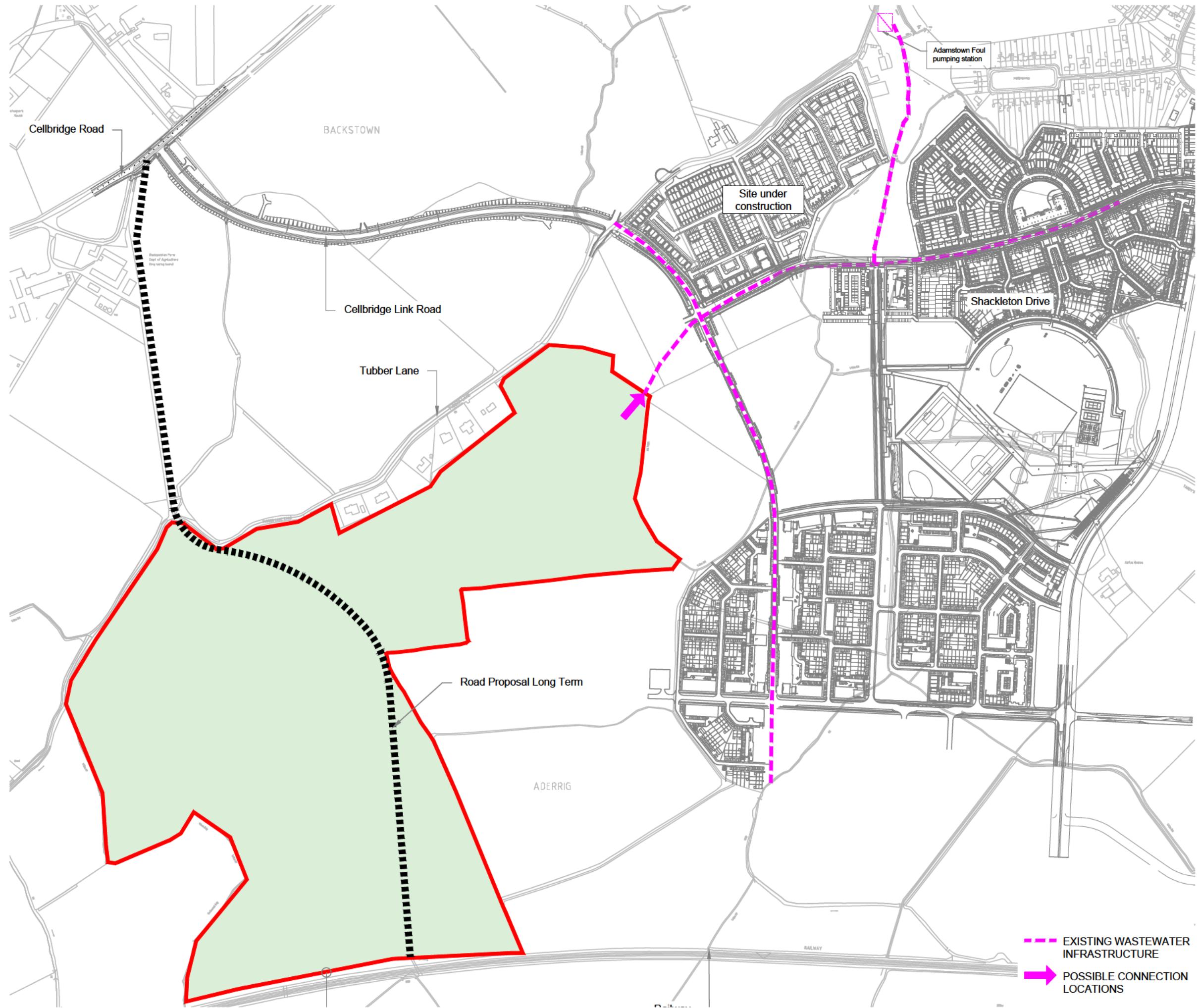
### 1.4 Summary

Item	Description
<b>Watermain</b>	Watermain located in Adjoining Celbridge Link Road and ready to connect.
<b>Wastewater</b>	Connections available with pipe network provided as part of Celbridge Link Road (under construction), via Adamstown SDZ development sites under same land ownership. Tubbermaclagg/Adamstown pumping station has been designed for cater for these lands
<b>Surface Water</b>	Connection available to existing drainage system servicing the lands currently
<b>Connectivity</b>	Pedestrian, Cycle and Vehicular access can be provided directly from the Celbridge Link Road (under construction) via SDZ land to the east. SDZ lands under same ownership. Lands also serviced by future “long term” road shown in development plan. Adamstown Railway station 1.0km away or a 15min walk. Adamstown is services by Dublin Bus routes 25 and 25b, 25d and 25x.
<b>Utilities</b>	Gas, Electricity, Telecoms & Fibre Broadband; all available in the adjoining Adamstown SDZ and Celbridge Link Road

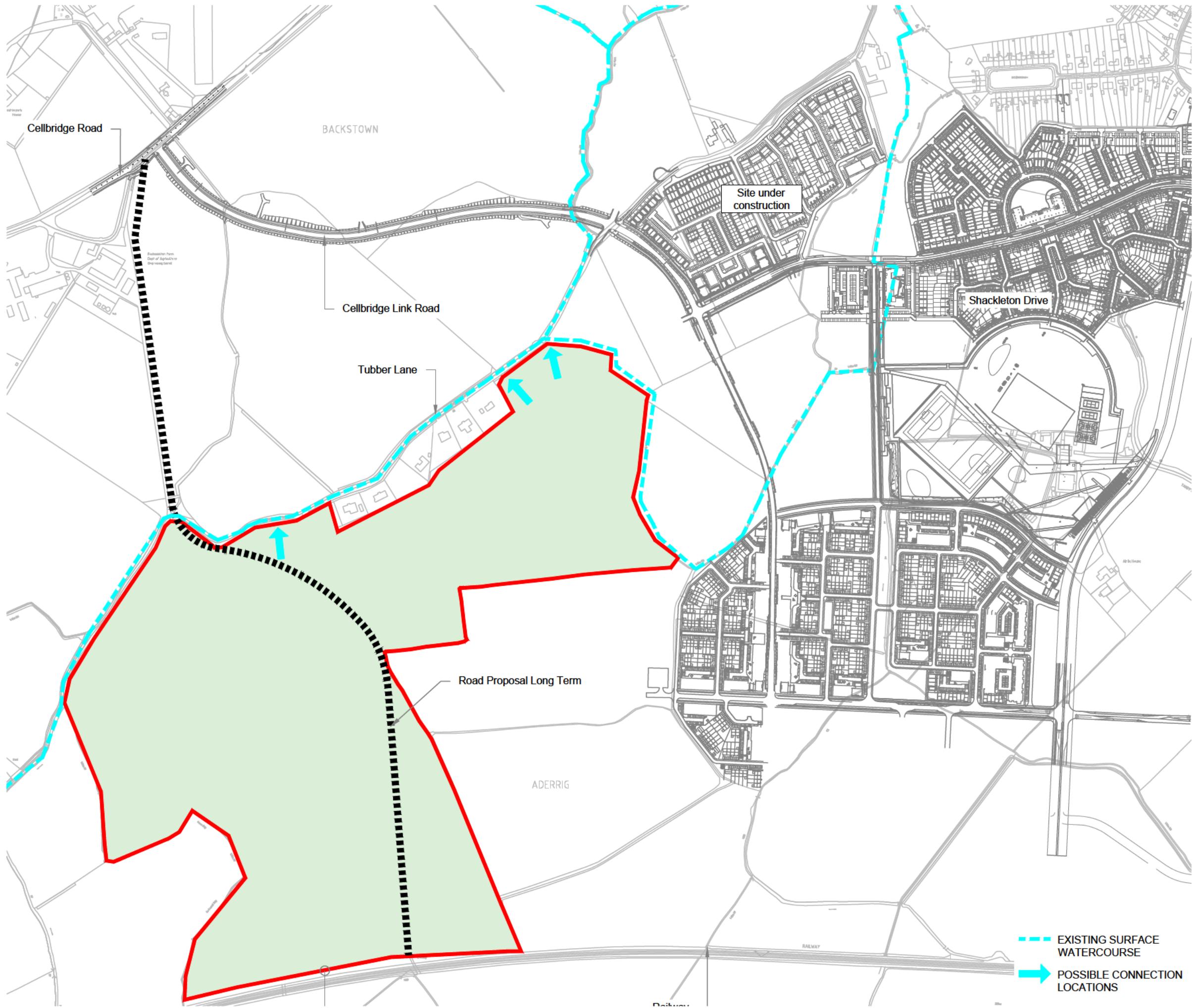
# WATERMAIN



# WASTEWATER



# SURFACE WATER





Aderrig,  
Co. Dublin

Ronan Mac Diarmada & Associates

Landscape Architects & Consultants



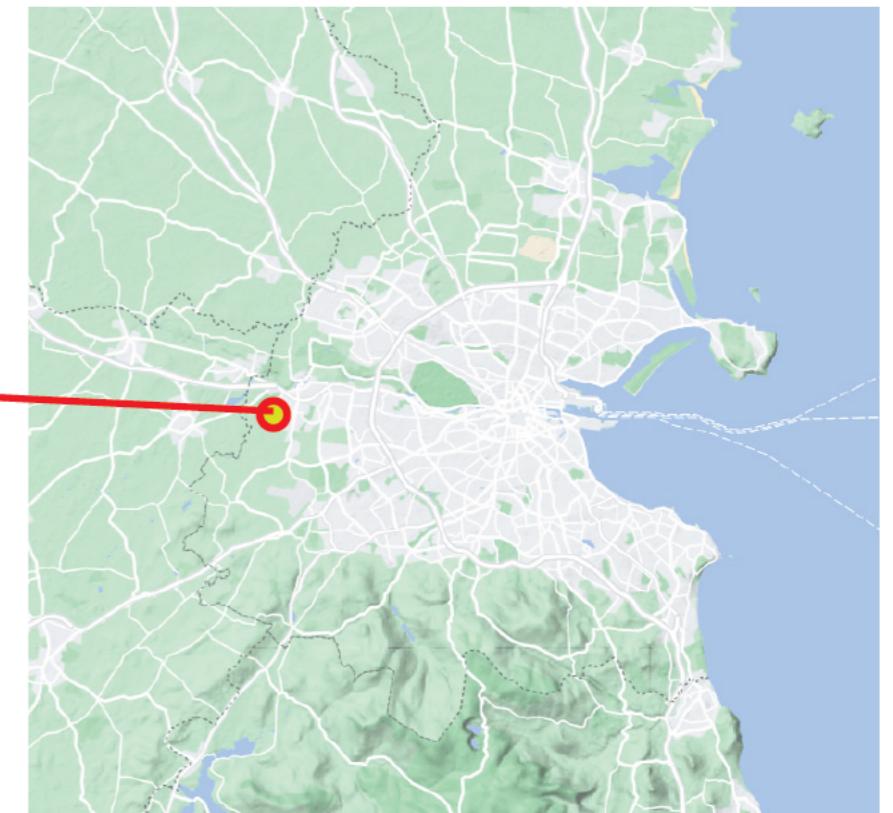
## LANDSCAPE RATIONALE

September 2021



# Site Context

## Location



Subject Lands

The site is located in the townland of Aderrig, in the Electoral Division of Lucan, in Civil Parish of Aderrig, in the Barony of Newcastle, in County Dublin. The Irish name for Aderrig is Áth Deirg, and is located roughly 17 km west of Dublin city centre.

Proposed public amenity areas and wildlife corridors aim to protect the ecological values and the ecclesiastical heritage of the site.



# Site Context

## Regional Development

### Brief:

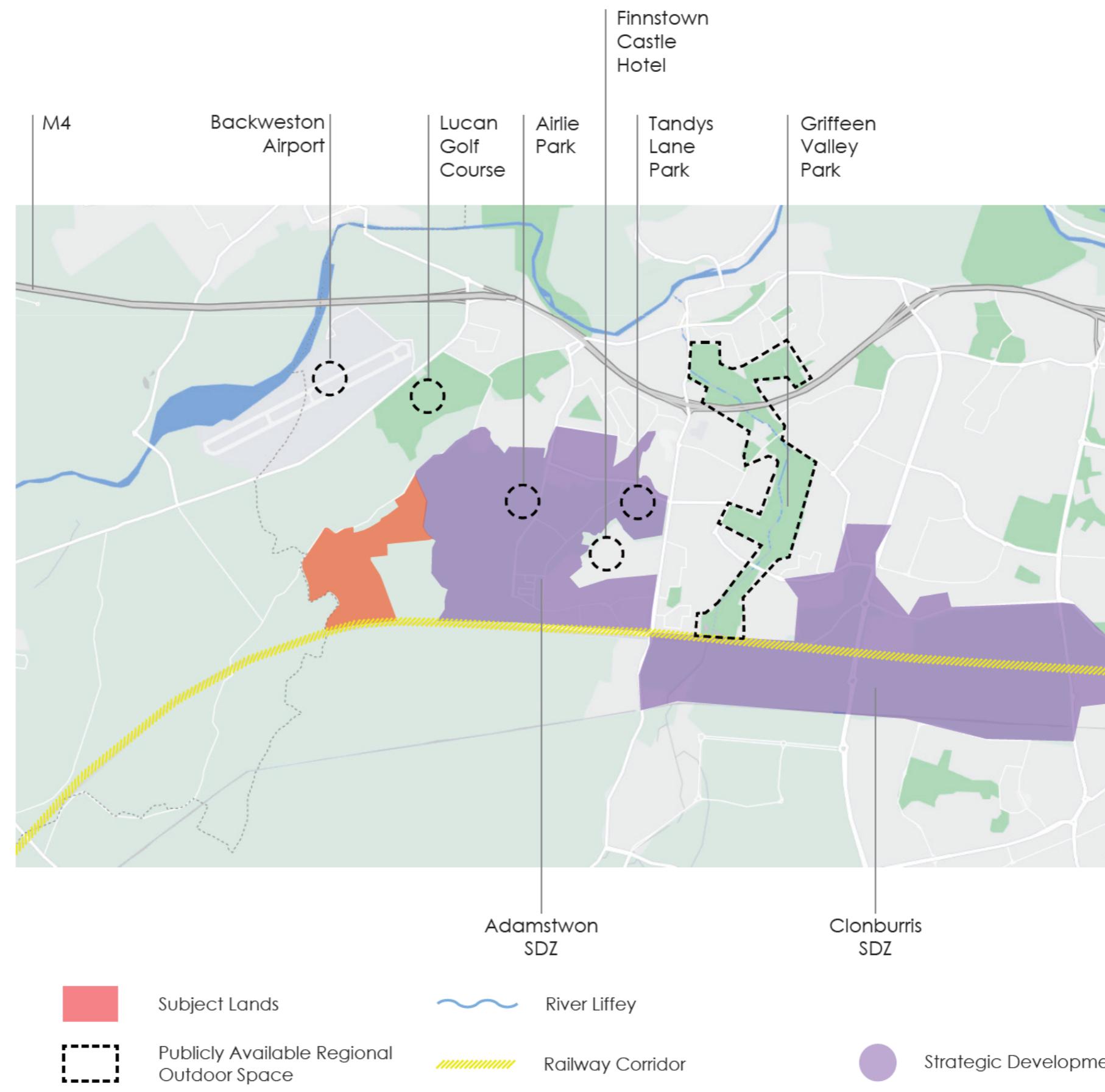
To create and extend sustainable transport links in the region, developing the subject lands as a strategic growth area along the 'South West' rail corridor, in harmony with adjacent developments.

### Aims:

Enhance lands currently under intensive agricultural use, to better contribute towards the biodiversity and Green Infrastructure of South Dublin's rural fringe

Provide multiple sustainable transport options and linkages between the proposed development and surrounding environs of Lucan, Leixlip, Celbridge and Adamstown.

Protect and enhance the ecological profile of the region. Providing public amenity that aims to preserve and highlight the ecclesiastical and cultural heritage of the site.



# Site Context

## Existing Structures - Aderrig Chruch



Aderrig  
Church Remains  
Georgian  
Farm House



Precedent Images



The ruins of the medieval church of Aderrig stand in an open field and once had a burial ground attached.

The ruins are largely obscured by ivy, and the adjacent boundary walls have been dismantled in recent years.

A georgian farmhouse with rustic barns are found in the neighbouring field.

These distinctive structures will serve as a focal point within the development's primary amenity area, and inform the character of the proposed park.



Site Image: Ruined medieval church of Aderrig

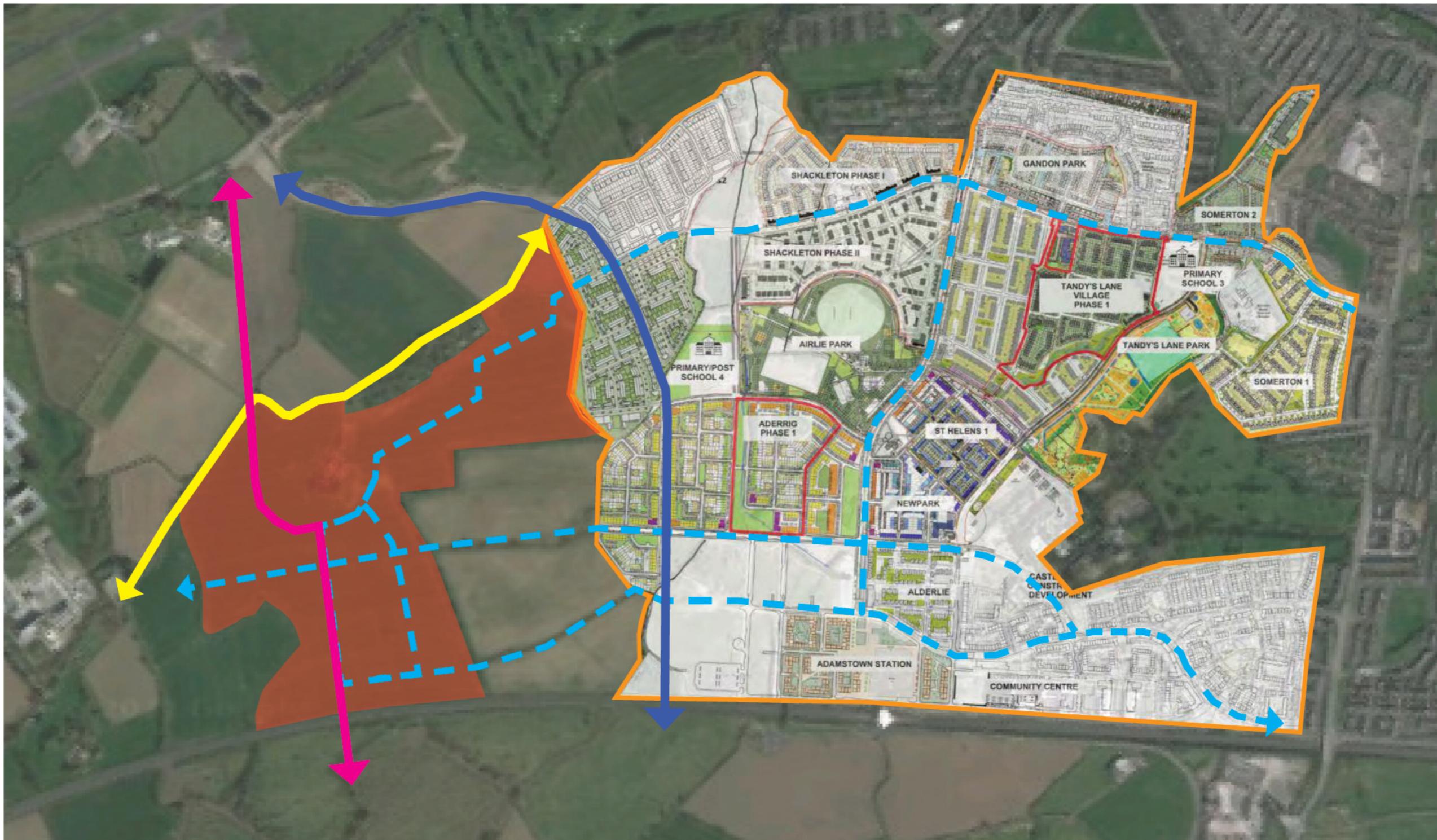


Site Image: Georgian farm house



# Concept Development

## Key Connections



Subject Lands



Existing Tubber Lane Road



Celbridge Link Road



Adjoining Adamstown SDZ



Key Routes / Links



Future North/South Link



# Concept Development

## Green Infrastructure Strategy

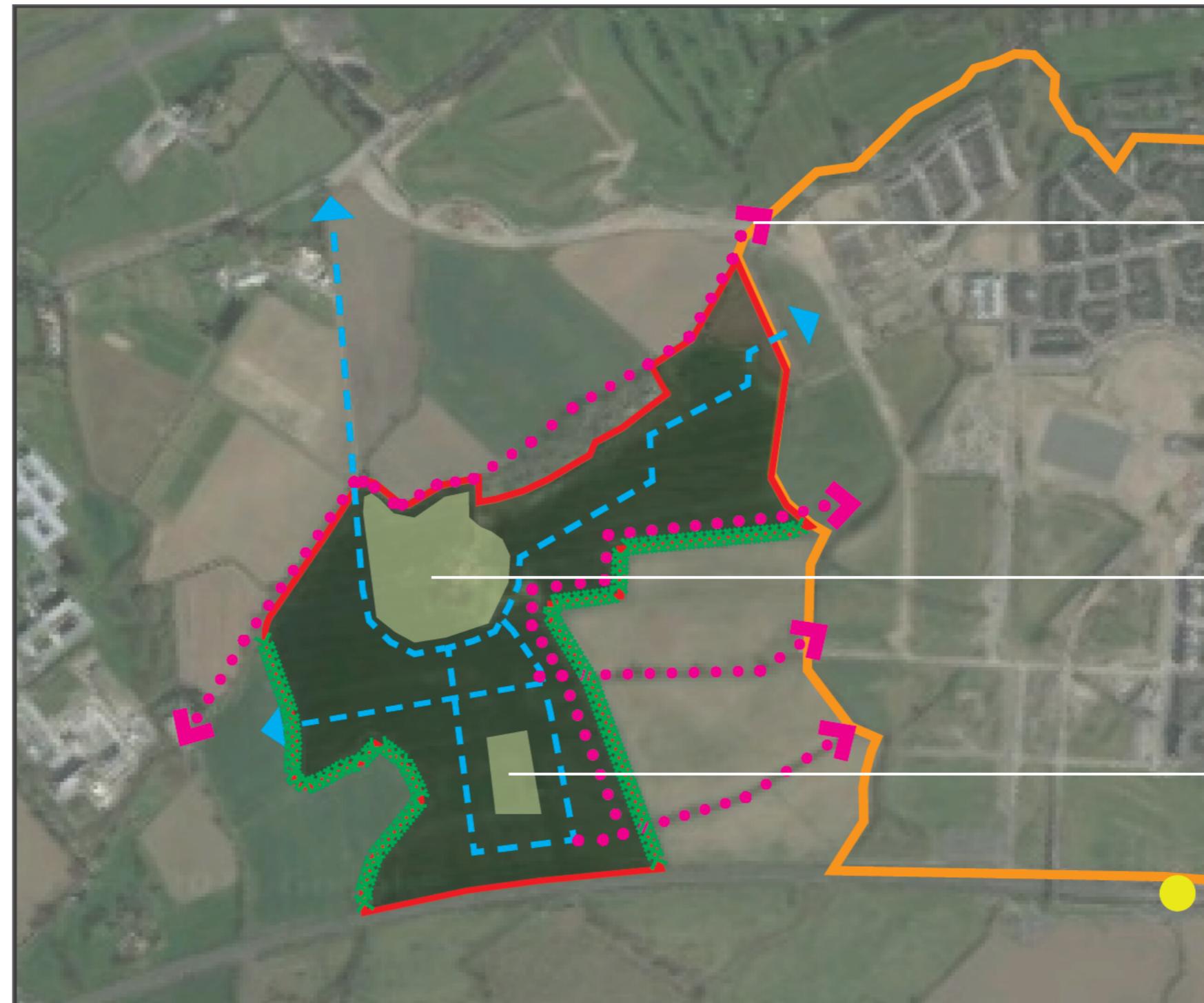
### Aims:

Connect existing regional outdoor spaces to establish an amenity and wildlife corridor between the Primary Liffey Valley Corridor, Backweston airport, Lucan Golfcourse, the proposed development, and the adjacent Adamstown SDZ.

To enhance Green Infrastructure at the 'Adamstown Link', as outlined in the Draft South Dublin County Development Plan 2022-2028.

Provide multiple sustainable transport options and linkages between the proposed development and surrounding environs of Lucan, Leixlip, Celbridge and Adamstown.

Protect and enhance the ecological profile of the region. Providing public amenity that aims to preserve and highlight the ecclesiastical and cultural heritage of the site.



Subject Lands



Open Space



Habitat Buffer



Greenway Links /  
Pedestrian Priority



Key Routes / Links



Adamstown Station



# Aderrig Church & Georgian Farm House

## Mood Board



Outdoor Marketplace



Arboretum & Retail



Outdoor theatre and opera space

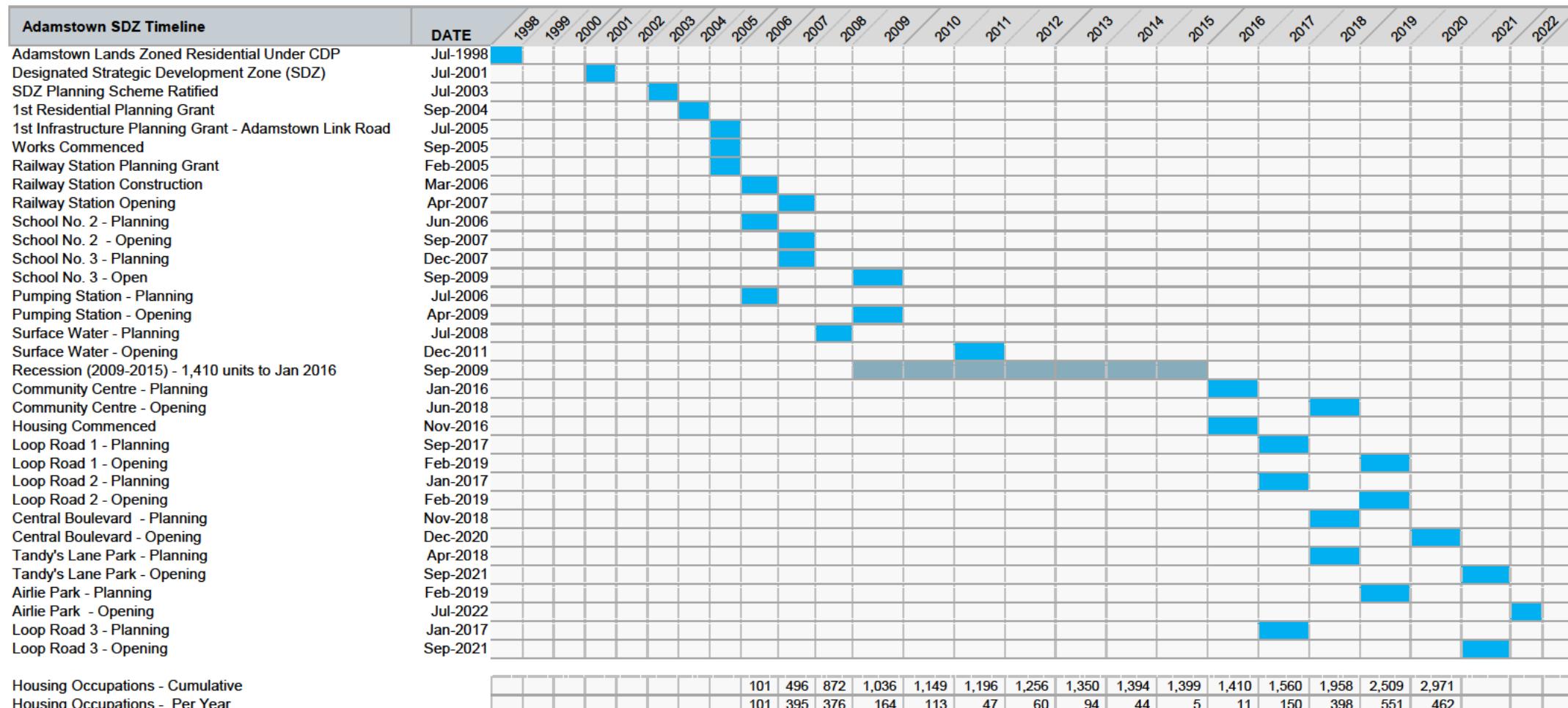


Courtyard garden

The unique setting will provide opportunities for markets, community gatherings, theatrical performances, and outdoor cafes, and provide community node and connectivity link to the surrounding urban areas,







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***Appendix 4 – EY Economic Case for Zoning Aderrig Lands – Key Issues - Draft Paper***

# Economic Case for Zoning Adderig Lands - Key Issues - Draft Paper

7 July 2021

## Table of contents

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**Reliance Restricted**

Mr. Hugh McGreevy  
Director  
Breengrove Limited  
223 Mount Prospect Avenue  
Clontarf  
Dublin D03 DX 04

**An evidence-based economic report to support the residential zoning of lands on the periphery of the Adamstown Strategic Development Zone - Key Issues Paper**

Dear Hugh,

In accordance with the terms of our engagement letter signed by you on 10 June 2021, we have prepared the first of two deliverables, namely a high level paper summarising the key issues to support the residential zoning of lands on the periphery of the Adamstown SDZ ("the Purpose").

**Limitations of Scope**

We have not, except to such extent as you requested and we agreed in writing, sought to verify the accuracy of the data, information and explanations provided by yourselves, and you are solely responsible for this data, information and explanations. We have therefore relied on the information provided by you to be accurate and complete in all material respects.

The report has been provided to you for the above Purpose only and should not be used or relied upon for any other purpose, nor should it be disclosed to, or discussed with, any other party without our prior consent in writing.

**Use and distribution of this report**

This report is prepared for the purpose set out in the Agreement and may only be used and disclosed, quoted or referred to on the basis set out therein. Ernst & Young only accepts responsibility to the addressees of this letter on the basis of the Agreement and assumes no responsibility whatsoever in respect of or arising out of or in connection with the contents of this letter to parties other than yourselves. If other parties choose to rely in any way on the contents of this letter, they do so entirely at their own risk.

We appreciate the opportunity to have provided EY's services to Breengrove Limited. Should you have any queries or comments regarding this report or if we may be of any further assistance, please do not hesitate to contact me on +353 1 221 2611.

Yours sincerely

Simon MacAllister



Partner

D Buckley, D Dennis, M Gageby, J Hannigan, S MacAllister, S MacSweeney, B McCarthy, D McSwiney, J Maher, A Meagher, I O'Brien, R O'Connor, F O'Dea, E O'Reilly, M Rooney, C Ryan, P Traynor, A Walsh, R Walsh.

The Irish firm Ernst & Young is a member practice of Ernst & Young Global Limited. It is authorised by the Institute of Chartered Accountants in Ireland to carry on investment business in the Republic of Ireland.

## 1. Introduction

Breengrove Limited is an established housebuilder in the Dublin Area who has delivered high-quality residential developments within South Dublin, particularly around the Lucan area, including Esker Park, Elmbrook, Ballydowd Manor, Hansted and now Hallwell, which is located at the heart of Adamstown.

Breengrove Limited require an economic rationale report to support the residential zoning of lands in the next South Dublin Development Plan 2022-2028. The lands in question are the Adderig Lands, which are contiguous to the existing footprint of the Lucan/Adamstown area in South County Dublin and are situated to the west of the Adamstown Strategic Development Zone (SDZ) and north of the Kildare rail line (Appendix 1).

Breengrove Limited commissioned EY to prepare an initial high-level paper which summarises the issues for consideration relating to zoning the lands in question. A more detailed report will follow which provides further economic data and articulates the detailed case for the zoning of the subject lands in the next SDCC Draft Development Plan.

This paper address eight key questions which are pertinent to the zoning of the lands under consideration. In advance of addressing these questions there are two key national issues which the zoning of the Adderig lands can help to address:

1. By zoning lands near public transport infrastructure and encouraging more public transport use, some reduction in emissions can be achieved compared with a scenario where the car is the single mode of transport in alternative locations not served by public transport. This point is relevant, following the recent publication of the latest assessment on climate change by the Intergovernmental Panel on Climate Change which strongly argues for rapid and sustained reductions in greenhouse gas emissions and notes the risk that current climate change objectives may not be achieved in the required timescale unless there are immediate actions taken by all.<sup>1</sup>
2. In anticipation of the forthcoming publication of the Housing for All Plan by the Minister for Housing, Local Government and Heritage and given that there are already significant affordability challenges in the housing market, the lack of zoned and serviced land in appropriate locations will continue to adversely impact and exacerbate the housing affordability problems for many first-time buyers and will further damage the competitiveness of the economy.

### 1.1 Consistency with national policy objectives

#### Question 1: Would zoning the subject lands be consistent with national policy objectives?

This point re is further justified following publication of the By zoning of lands near public transport infrastructure, and encouraging more public transport use, some reduction in emissions can be achieved compared with a scenario where car is the single mode of transport in alternative locations not served by public transport.

The location of the Adderig lands, which share a common border with the Adamstown SDZ, indicates that it has a role in meeting the objectives of more balanced and more concentrated growth in Project Ireland 2040 and the National Planning Framework (NPF). The NPF, in an effort to stem the continual expansion and sprawl of cities and towns out into the countryside, has set out

<sup>1</sup> <https://www.ipcc.ch/assessment-report/ar6/>

ambitious targets to achieve compact growth, including<sup>2</sup>

- “a target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs” (p27), and
- “50% of new city housing within existing Dublin City and suburbs footprint” (p29)

The location of the proposed lands means that it can provide residential accommodation to respond to population and employment growth in suburban Dublin.

In relation to residential development the NPF has a range of other policy objectives which the lands under consideration are consistent with and these will be elaborated in the more detailed report to follow. There are references to, for example:

- The “better use of under-utilised land and buildings .....with higher housing and jobs densities, better services by existing facilities and public transport” (p22); and
- Prioritising “the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location” (p92)

The proposed lands could deliver further residential development in a location which is adjacent to Adamstown and consistent with the appropriate density and accommodation for the area.

According to the Regional and Spatial Economic Strategy (RSES) for the Eastern and Midland Region, the strategic location of residential development in the South Dublin Region is to be determined using an asset-based approach. This approach supports evidence-based policy making to identify the settlements which have the greatest capacity and potential for compact growth and ensures that these are supported by the requisite investment in infrastructure and provision of employment, amenities and services. On this basis any lands zoned for residential development in the next development plan are to be evaluated using a set of 25 different indicators (e.g. population, population growth, commuting patterns, employment provision, access to education, infrastructure) which have been used to develop a list of asset based criteria to enable places to fully realise their potential. These criteria have been applied to the Adderig Lands (Appendix 2) and shows how the location straddling the Naas Road and contiguous with Adamstown is consistent with the policy objectives for the settlement hierarchy for the region.

## 1.2 The Office of Planning Regulator

### Question 2: To what extent are the issues raised by the Office of Planning Regulator (OPR) important for long term residential development?

Recent statements from the OPG on the Issues Paper for the South Dublin County Development Plan 2022-2028 regarding where the county's future population growth should be directed are encouraging for the lands under consideration.<sup>3</sup> The OGP advises that a significant proportion of the county's future population growth will need to be directed to:

1. Naas Road / Ballymount Strategic Development Area, which has potential for residential development and more intensive employment / mixed use
2. South western corridor (western suburbs) - SDZ lands and Kilcarbery
3. South western corridor (LUAS red line) - Tallaght Town Centre / Cookstown and Fortunestown / Saggart / Citywest

<sup>2</sup> Project Ireland 2040, National Planning Framework. <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

<sup>3</sup> <https://www.opr.ie/submissions-submitted-by-the-opr/>

In the context of the above direction from the OGP, it is worth noting that the lands to facilitate residential development in Adamstown, south of Lucan village, were zoned in 1998, 23 years ago. Almost 25 years earlier, Lucan village itself was designated as a new town in the 1972 Dublin County Development Plan. Recognising that something had to be done to provide for population growth in the region at the time, the development of new towns, like Lucan, to the west of Dublin, would shape the way the western periphery of the city would develop in the future.

These three areas noted by the OGP are in the vicinity of Aderrig and Adamstown and support the logical extension of the county further west of Adamstown to include the residential zoning of the Adderig lands, given the constraints of the Dublin Mountains to the south.

Moreover, a failure to zone the Adderig lands could jeopardise the optimum delivery of Adamstown where approximately 9,000 residential units are expected to be delivered. With the population of South Dublin projected to increase by 42,000 to 50,000 between 2016 and 2031 (Appendix 3), this corresponds to between 14,000 and 17,000 new homes over the 15 years, assuming no change in the average household size of 3 persons in South Dublin (2016 Census). While accepting that other new developments will take place elsewhere in SDCC, the average household size could fall by 2031, which would give rise to a greater housing need in the county, which may need to be accommodated in the outer Leinster counties like Kildare and Meath. This pattern of development is not consistent with national policy objectives.

## 1.3 Zoned lands in SDCC

### Question 3: What is the current position in SDCC regarding the quantum of lands zoned for residential development for the long-term?

According to the South Dublin County Council Development Plan 2016-2022 there is a total land capacity of 1,192 ha available for residential development. This would accommodate approx. 36,000 residential units (at an average gross density of 30 units per ha).

SDCC's current position is that there are sufficient lands zoned for residential development under the current development plan. The expectation is that the current zoned lands (some are legacy lands which have been zoned in previous development plans but may now be deemed unsuitable) will be assessed based on asset based criteria (Appendix 2) to determine the optimal strategic location of residential development in the South Dublin Region. Any lands zoned in the next County Development Plan will need to have the capacity for population and employment growth, predominantly in the south west of the county, including those locations recommended by the OGP.

With Adamstown due to be built out over the next three years and Clonburris likely to be built out before 2027, it is essential to plan for the delivery of housing post 2027. Given the long lead in time for planning sustainable residential developments (Section 1.8), the Adderig lands, as the logical extension of the Adamstown SDZ, are deemed suitable based on the RSES criteria.

It is noted that at a SDCC Development Plan Meeting held on 17 June 2021, the following motion 68 was raised:

*“That South Dublin County Council pursuant to Section 11(5)c of the Planning & Development Act 2000 (as amended) resolves to amend the Chief Executive's Draft Development Plan 2022-2028 as follows:*

*Identify lands at Aderrig, as identified in red in the aerial view and map below, for an 'Objective RES-N' land use zoning 'To provide for new residential communities in accordance with approved area plans' on Map 1 of the Draft County Development Plan, currently zoned agricultural [objective RU].<sup>4</sup>*

The response provided was as follows:

*"The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with National and Regional Planning policy as required under the Planning and Development Act. South Dublin County is anticipated to grow by 46,518 persons with an identified need for over 17,817 households.<sup>5</sup>*

*Chapter 2 also confirms that the County has enough land to accommodate this need and additional for a further 10,470 units (79%) above the net household need. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.*

*The proposed lands located to the west of Adamstown SDZ comprise of existing agricultural fields and are zoned RU where it is an objective of the plan "To protect and improve rural amenity and to provide for the development of agriculture." Based on general assumptions using the prevailing Ministerial Guidelines, the re-zoning of the subject lands has an approximate potential on simple density figures, not accounting for full planning assessment of the lands, for 2,500 household units (at average gross density of 50uph x 50Ha). This has the potential to increase the excess of zoned to 12,970 units or 98% above the net household need set by National and Regional plan level. The current excess of zoned land, without the need for further zoning, is sufficient to meet SDCC's household requirement for 2031 and potentially up to 2040.*

*In this context, the motion could undermine the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which is contrary to National and Regional Planning Policy.*

*There is no evidence based justification for the zoning of these greenfield lands from Rural to Residential and to do so would be contrary to national and regional policy."*

The following observations are noted based on the above response:

- ▶ It is assumed that the lands designated in the next development plan, including the additional lands to accommodate the 10,470 housing units, have been assessed using the asset-based criteria in the RSES to promote growth locations and are included on suitability grounds. Given the changing policy objectives set out in Project Ireland 2040 and in the NPF, it may be necessary to reassess these lands, as some may be lands carried over/legacy lands from previous development plans and may not be in the most suitable locations.
- ▶ Based on the response, the housing requirement total is 30,787, if the 2,500 units are included from the Adderig lands. Assuming an average household size of 3 persons (SDCC Census 2016), this would accommodate a population of around 90,000 persons compared with the growth of 50,000 projected for the county in the high growth scenario in the NPF. Given the current difficulties in the housing market and the level of pent-up demand built up over two decades, three points are noted:

<sup>4</sup> SDCC - Development Plan Meeting - 17<sup>th</sup> June 2021

<sup>5</sup> The figure of 46,518 is close to the growth projected under the low growth scenario between 2016 and 2030 of 41,500 (Appendix 3) while the housing need of over 17,817 is close to the estimate provided under Section 1.4 of 17,736 (Appendix 4).

1. It would not be intended to provide all this housing in the period of the next Development Plan 2022-2028; the Adderig housing units would not come on stream until after 2028.
2. The Adamstown SDZ is expected to accommodate in the region of 30,000 persons of the growth of 40,000 to 50,000 when completed in the next two to three years. To some extent the units to be provided in the Adamstown SDZ are approved permissions and are not relevant to the issue of lands to be zoned in the next Development Plan.
3. As discussed in Section 1.8, the housing market requires certainty of supply and one mechanism to ensure this certainty is to eliminate the volatility in land prices by providing an adequate and suitable supply of zoned lands for residential development.

▶ The inclusion of the Adderig lands would not take from any development elsewhere in the county, it would instead comprise an extension of the SDZ to contiguous lands, ensuring the infrastructure and amenities put in place in Adamstown are fully utilised. The analogy of Lucan Village and the development of Lucan as an extension of the village is a case in point. The population of Lucan increased from 4,245 to 12,451 between 1971 and 1976 and had increased to 37,300 in the 2016 Census.

#### 1.4 Housing Demand in SDCC

##### Question 4: What is the projected demand for housing in the area of SDCC?

The new guidelines from the Department of Housing relating to "Guidance on the preparation of a Housing Need & Demand Assessment" produced by the Department of Housing were published in March 2021 and contain a range of documentation and supporting tools used to prepare a Housing Need and Demand Assessment (HNDA) for each local authority. The ESRI prepared the housing projections to be used for the process of the HNDA, the Housing Strategy and the County Development Plan.<sup>6</sup>

Overall, the ESRI expect national annual housing demand to decline from 30,852 units 2021 to 27,821 units in 2031 and 24,291 in 2040.

There is a range of other housing demand projections from other sources (e.g. PII, IIP, Davy, Central Bank, Daft.ie) which illustrate the sensitivity of housing demand to a range of assumptions, and thus the uncertainty in the forecasts. Given the very uncertain housing market and the many factors which can impact housing demand, this range of uncertainty raises the risk of relying on one piece of work to determine housing demand over next twenty years.

For the purposes of this exercise, the key conclusion concerns the projected housing demand in SDCC which the ESRI forecast at 2,058 units in 2021, falling to 1,491 units in 2026 and 1,233 units in 2031 (Appendix 4). Assuming these figures represent five year annual averages, the total projected housing demand in SDCC over the period 2020-2031 is 17,736 or 1,478 units per annum on average.

The average level of housing completions in SDCC in the period 2015-2019 was 1,016 units. The outturn of 1,614 units in 2020, was just below the corresponding delivery in 2019 (1,664). It is noted that the ESRI's projection for 2017 was 1,952, which is over twice the actual level of completions of 981 units in that year (Appendix 5). Based on these numbers and the situation prior to 2020, there is housing demand which has not been accommodated in SDCC.

<sup>6</sup> Source: Regional demographics and structural housing demand at a county level, ESRI, December 2020, <https://www.gov.ie/en/publication/ea99-housing-need-and-demand-assessment-hnda/>

Many factors can impact future housing demand, such as assumptions about future average household size, including the trend toward smaller households and a growing younger and older population as well as economic factors, such as affordability, employment and migration. A key factor is the average household size and whether it remains unchanged or falls in line with other countries in Europe, such as the UK or Germany, for example. The average household size in SDCC was 3.0 persons in 2016. Assuming a range of scenarios for the average household size out to 2031, analysis suggests that the annual housing requirement in SDCC would range between 1,014 and 2,564 units by 2031, based on the SDCC high population scenario and the average household size falling in line with the UK by 2031, which would generate an average household size of 2.66 in SDCC by 2031. This change to one assumption alone illustrates the sensitivity of housing demand projections.

In a separate analysis of the now superseded Regional Planning Guidelines 2010-2022<sup>7</sup> and the current development plan for SDCC for the period 2016-2022, it is evident that the ESRI's housing projections result in a significant reduction in the housing targets that underpin the zoning plans in the existing Development Plan. Comparing the current Development Plan core strategy target (the achievement of which is already in train) with the most recent HNDA targets (according to the ESRI) shows a reduction in projected demand for new housing in South Dublin of 61% (Appendix 6). A similar analysis for the neighbouring counties of Kildare and Meath results in reductions of 52% and 51% respectively. This has obvious implications for land zonings, yet the situation today is that there is substantial unmet demand for housing and the population of Dublin is projected to increase by 217,300 by 2031 with South Dublin projected to increase by 50,000 (High Growth scenario). These additional people are to be accommodated within and close to the existing footprint of built up areas and by progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors. The alternative is that they are accommodated in Kildare and Meath, with adverse consequences for the delivery of sustainable development.

## 1.5 Consolidating the development potential of the Adamstown SDZ

### Question 5: What is the rationale for zoning further lands adjacent to the Adamstown Strategic Development Zone?

It is important to note that SDZs were established in planning legislation in 2000 and enabled Government to designate certain parcels of land for fast track planning processes, predominantly for the delivery of new housing, where the development of that area was deemed to be of strategic and national importance. The vast majority of the designations at the time were for sites located on major public transport corridors which could provide attractive sustainable new housing locations at a significant scale. A number of SDZ sites were designated across the Dublin area and are seen as privileged locations which have the capacity to become major catalysts for economic activity across the Dublin City Region and beyond for generations to come.

Adamstown is one of these SDZ sites where significant public and social infrastructure has already been put in place, including accessibility to public transport, with Adamstown railway station located along the southern boundary. The SDZ has to date delivered 2,613 (SDCC Issues Paper 2022-2028) houses out of a total planned of approximately 9,000 residential units in the area. The lands in question are contiguous to the western border of the Adamstown SDZ.

The Adderig lands form a natural and logical extension of the Adamstown SDZ area. As such these lands should be consolidated and their development potential maximised in such a way that they

<sup>7</sup> The targets in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 were deferred to the 2016-2022 period.

result in adding value to the existing land portfolio comprising Adamstown. Moreover, their future development would capitalise on the significant and on-going investment in physical, social and community infrastructure in the Adamstown SDZ area.

## 1.6 Integrated transport development

### Question 6: Are there benefits from locating housing where there are existing and planned rail links in the catchment area?

While locating housing close to public transport development has been a feature of Government policy for decades, the importance of transport oriented developments has come to the fore, given the emergence of sustainability and climate change challenges. A recent report from EY discussed the benefits of integrated transport developments as a form of high-density, sustainable urban development, which seeks to maximise land-use in the provision of housing, employment, public services and public spaces within close proximity to efficient and reliable public transport.<sup>8</sup> When effectively developed, such developments, by putting transport hubs at the heart of communities, result in a reduction in urban sprawl, reduced traffic congestion and less emissions.

The designation of Adamstown as an SDZ has meant that significant community and transport infrastructure is planned or has already been put in place, which will require a critical population mass to ensure the optimum outcome for the Adamstown area. Given the contiguous location of the lands in question, the development of additional housing would ensure the infrastructure already put in place is fully utilised.

This point re sustainable transport options is further justified following publication of the recent publication of the latest assessment on climate change by the Intergovernmental Panel on Climate Change which strongly argues for rapid and sustained reductions in greenhouse gas emissions and notes the risk that current climate change objectives may not be achieved in the required timescale unless there are immediate actions taken by all.<sup>9</sup> By zoning of lands near public transport infrastructure, and encouraging more public transport use, some reduction in emissions can be achieved compared with a scenario where car is the single mode of transport in alternative locations not served by public transport.

It is noted in the Office of the Planning Regulator response to the Issues paper for the South Dublin County Development Plan 2022-2028, an acknowledgment of the importance of an integrated approach to land use and transportation.

The RSES and the Dublin Metropolitan Area Strategic Plan (MASP) refer to the identification of key strategic residential employment corridors along key public transport corridors, existing and planned, that contain development opportunities. The location of the Adderig lands to the immediate north of the Kildare rail line on the South West Corridor, is part of the DART+ Programme to deliver electrified services from Hazelhatch / Celbridge to the City Centre. Several bus routes also serve Adamstown and the adjacent areas, including the 25B and 25D, supporting the development opportunity at Adderig. Moreover, there is potential to provide a new train station at Aderrig to the west of Adamstown and east of Hazelhatch to serve an extension of the new strategic development area within the county. The RSES also notes that in the medium to long term strategy for the area there are plans for water waste upgrades and a new water network.

<sup>8</sup> Meeting the Vision of Ireland 2040 - an integrated solution for a sustainable future, EY, June 2021.  
<sup>9</sup> <https://www.ipcc.ch/assessment-report/ar6/>

The western suburbs have been identified in the RSES for continued development to accommodate a growing population. Promotion of high tech manufacturing and research and development in the Grange Castle Business Park will contribute to a higher demand for housing in the areas of Aderrig, Adamstown, Clonburris and Lucan as employees desire to live close to work and avail of public transport for a shorter commute time. Nine educational facilities are in close proximity to the site ranging from primary to tertiary educational facilities. Zoning the lands in question will ensure that the need for housing over the medium-term can be accommodated where multi-modal public transport access will service the community in terms of employment, education and leisure.

Failure to zoned sufficient lands to generate this critical mass of residential development increases the risk that new and expensive public transport options will need to be provided elsewhere, resulting in the diversion of limited public capital funding to the provision of infrastructure in other locations. Additional lands may also have to be zoned in counties adjacent to South Dublin, resulting in potentially higher development levies to fund the necessary infrastructure required to deliver new housing on greenfield sites.

The development of the Adderig lands would also support Ireland's transition to a low carbon climate resilient economy. This transition reinforces the need to ensure future planning and development is sustainable. This means delivering residential development where investment in infrastructure and supporting amenities has already been put in place or are planned, thereby creating attractive urban settlements in which people can live, work and play.

## 1.7 The current housing crisis and residential land zoning

### Question 7: What lessons from the current housing crisis and the issues surrounding the lack of housing delivery are relevant to zoning residential lands?

Housing is the key priority for Government and continues to feature heavily in news coverage. The housing issue was a critical issue facing the economy before the pandemic and it continues to be so as the pandemic recedes. Moreover, the Taoiseach confirmed this is the case when he told his cabinet mid-May that housing is the Government's "number one priority".

However, the housing market remains dysfunctional and there remains a significant demand for housing, with a recent estimate from Davy suggesting a demand of c. 200,000 over the next three years, due to unsatisfied demand over recent years arising from undersupply, inward migration and changing demographics.<sup>10</sup> Davy's research, which calls for a "a step change in supply" follows a range of other statements, from Property Industry Ireland, Ibec and the Irish Home Builders Association over the past year, which acknowledge the lack of housing delivery.

Against this background housing delivery remains an unresolved issue.

Past experience suggests that when the quantum of residential zoned land is limited, developers will compete for the sites that are available, creating higher land prices. Moreover, the price of land will dictate the price developers set or expect to set for housing. In a scenario of higher land prices due to limited supply, this may impact the availability of affordable housing, leaving potential house buyer demand unmet.

To ensure continuity of housing supply, on a stable profile, local authorities need to ensure there is an ongoing supply of suitably zoned lands in the right locations. Making land available at the time housing is required is too late. The RSES provides a framework (i.e. the asset based criteria approach at Appendix 2) to ascertain what lands are suitable to support housing and employment

<sup>10</sup> Special Report, The Irish housing market - where next? Davy, June 2021.

growth in the future. This places the onus on the local authority to ensure that potential zoned lands across the county, including current and/or legacy zonings in the current development plan 2016-2022, are assessed using this framework to justify their inclusion in the next development plan 2022-2028.

The housing market requires certainty of supply and one mechanism to ensure this certainty is to eliminate the volatility in land prices by providing an adequate supply of suitable zoned lands for residential development.

## 1.8 Long lead in time for planning

### Question 8: Is it necessary to plan well in advance for the delivery of housing over the next 15 to 20 years?

The lead-in time for planning the delivery of sustainable communities is significantly longer than the period of a Development Plan. This is evident from the historical position relating to the Adamstown SDZ. The lands to facilitate residential development in Adamstown were zoned in 1998 and the original SDZ was approved in 2003. With just 2,613 new homes built to date in Adamstown out of a total planned of around 9,000 (SDCC Issues Paper 2022-2028), 23 years after the first lands were zoned, this portrays the importance of zoning sufficient lands well in advance to cater for future housing need.

The SDCC Development Plan 2016-2022 indicated that Adamstown was capable of delivering its entire capacity of almost 9,000 units by 2022; yet only 2,613 new homes have been provided to date.

The development of the Adderig lands would accommodate housing demand well beyond the current development plan or the next development plan 2022-2028, given the long lead in time for planning. However, by securing the Adderig lands as zoned lands in the next development plan, this will allow a masterplan to be developed for the period beyond 2030 and the appropriate and early planning for the requisite infrastructure (water, public transport) to be commenced. It has been demonstrated that the Adderig lands meet the RSES asset based criteria (Appendix 2) for designation as a strategic location for residential development in the South Dublin Region to support population and employment growth in the South West of the county. Based on the experience in Adamstown, it is likely that the inclusion of the Adderig lands in the next County Development Plan 2022-2028 would mean that it would only support housing demand beyond 2028.

## 1.9 Conclusions

This paper raises a number of issues regarding the subject lands. It is considered that the zoning of the Adderig lands in the next Development Plan is justified, for the following reasons:

- ▶ Their location on the periphery of the Adamstown SDZ
- ▶ The provision of housing on the Adderig lands is consistent with national housing policy objectives
- ▶ The lands meet the criteria set down in the RSES for supporting population and employment growth
- ▶ The lands are within the areas recommended for further development by the OGP and support the logical extension of the county further west of Adamstown, given the constraints of the Dublin Mountains to the south.

- ▶ The development of the Adderig lands meet the principles of integrated transport development, given that significant community and transport infrastructure is planned or has already been put in place in Adamstown, and would also support Ireland's transition to a low carbon climate resilient economy.
- ▶ There is considerable pent-up housing demand in the economy which was not accommodated in the last two development plans 2010-2016 and 2016-2022 due to economic circumstances.
- ▶ Relying on a single target of 17,736 units for the period 2020-2031 and not considering other projections is a high-risk approach. Furthermore, this estimate is highly sensitive to changes in a number of assumptions.
- ▶ It would not be intended to provide housing on the Adderig lands in the period of the next Development Plan 2022-2028; these additional 2,500 units would not come on stream until post 2028 but having them designated as zoned for residential development in the next development plan would allow a masterplan to be developed for the period beyond 2030 and the appropriate and early planning for the requisite infrastructure (water, public transport) to be commenced, to ensure units are provided in time to the market. Repeating the mistakes of the past is not an option.
- ▶ By zoning lands near public transport infrastructure and encouraging more public transport use, some reduction in emissions can be achieved compared with a scenario where the car is the single mode of transport in alternative locations not served by public transport.

#### Appendix 1 Map of the Adderig Lands



## Appendix 2 - Application of Asset-Based Criteria to the Adderig lands

The following table applies the RSES asset-based approach to the strategic location of residential development in the South Dublin Region to the Adderig lands to illustrate their suitability for supporting population and employment growth in the south west of the county, alongside the already designated Adamstown SDZ.

Asset/Potential Based Criteria Approach to Growth Strategy		
Asset-Based Criteria	As Expressed in Economic Strategy	Does Aderrig meet these criteria?
<b>Scale</b> Centres of scale which have the critical mass to drive growth	Critical mass (and diversity) in population and enterprise base to attract and maintain employers and employees	Growing population Adjacent to Grange Castle Business Park and Google Centre
<b>Function</b> Functional role and level of services including provision of employment	Development of regional/county level economic profile and performance of settlements, including economic assets	Population projections suggest South Dublin's population to grow by 0.9% to 1% per annum on average 2016-2031. Aderrig provides a solution to the housing demand associated with this growth.
<b>Human Capital</b> Talent attraction and skills development	Availability of labour force demographics, skills matching, and talent attraction policies to develop employment opportunities	Tallaght Institute of Technology in proximity as well as 9 schools in Aderrig, Adamstown and Lucan
<b>Placemaking</b> High quality vibrant public spaces and enhanced quality of life	Developing attractive places to live, work and invest in. Linked to 'functionality' to meet enterprise and labour force expectations	Short commute time to the city centre (abundance of multi-modal transport options) Grange Castle Business Park, Google centre and other large employers in the area Shopping, parks and sports facilities in the area
<b>Enterprise Ecosystem</b> Enterprise clusters and networks	Spatial economic engines and areas of influence and ecosystems of innovation and entrepreneurship	Tallaght, the Naas Road/ Ballymount, Adamstown, Grange Castle and Clonburris are identified as areas for potential employment development under the RSES
<b>Connectivity</b> Transport capacity and accessibility and communications	Global/ national/ regional connectivity including ICT, transport and infrastructure	The connectivity supplied through the Dublin-Kildare rail line, DART expansion and Luas red line as well as, several bus routes which serve Aderrig/ Adamstown and the adjacent areas, which include the 25B and 25D
<b>Natural Capital</b> Environmental sensitivities, resources and assets	Significant resource potential of renewable energy	The Tallaght District Heating Network created by SDCC provides low energy heating for housing in the areas of Aderrig/Adamstown
<b>Infrastructure</b> Enabling infrastructure to drive regional growth	Strategic employment locations enabled by physical, technology infrastructure and supporting service	Google centre is in proximity to Aderrig lands, employees are specialised in technology support services and desire to live within a short commute to employment

Source: Regional and Spatial Economic Strategy for the Eastern and Midland Region, Appendix A: Asset Based Criteria and Settlement Profiles. <https://emra.ie/final-rses/>

## Appendix 3 - Projected Population

The population projections for South Dublin in the National Planning Framework and the regional Spatial Economic Strategy for the Eastern Region over the period 2016-2031 range from an annual average growth of 0.9%, assuming the low population projection, to 1.1%, based on the high growth projection. These projections are similar for Dublin and the entire RSES region and are marginally behind Kildare and Meath.

POPULATION	2016	2026	2031	2016-2026	2026-2031	2016-2031
				Average annual percentage growth		
SDCC - Low	279,000	308,000	320,500	1.0%	0.8%	0.9%
SDCC - High	279,000	314,000	329,000	1.2%	0.9%	1.1%
Dublin - Low	1,347,500	1,489,000	1,549,500	1.0%	0.8%	0.9%
Dublin - High	1,347,500	1,517,500	1,590,000	1.2%	0.9%	1.1%
Kildare - Low	222,500	249,000	259,000	1.1%	0.8%	1.0%
Kildare - High	222,500	254,000	266,500	1.3%	1.0%	1.2%
Meath - Low	195,000	216,000	225,500	1.0%	0.9%	1.0%
Meath - High	195,000	221,000	231,500	1.3%	0.9%	1.2%
Total RSES - Low	2,329,000	2,566,500	2,668,000	1.0%	0.8%	0.9%
Total RSES - High	2,329,000	2,619,000	2,740,500	1.2%	0.9%	1.1%

Source: Regional and Spatial Economic Strategy for the Eastern and Midland Region, Appendix B: County Population Tables. <https://emra.ie/final-rses/>

## Appendix 4 - Projected housing demand to 2040

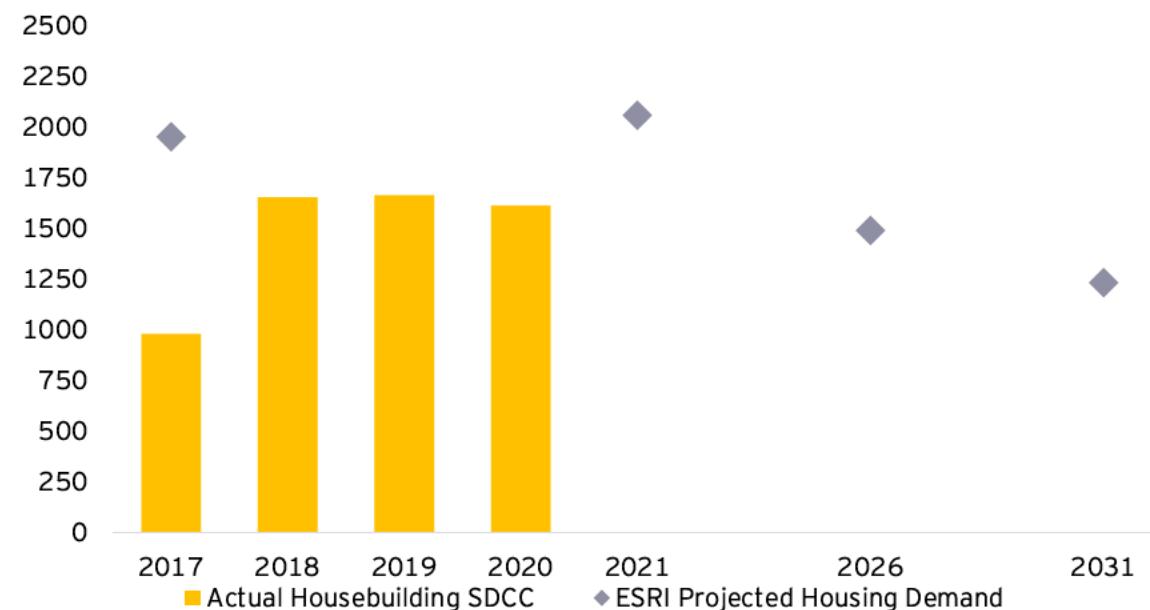
ESRI STRUCTURAL HOUSING DEMAND PROJECTIONS 2017-2040					
BASELINE					
Year	2017	2021	2026	2031	2040
Dublin - Dublin City	4,190	4,333	3,278	3,415	3,293
Dublin - DLR	1,756	1,930	1,636	1,550	1,296
Dublin - Fingal	2,034	2,152	1,381	977	743
Dublin - South	1,952	2,058	1,491	1,233	1,087
Kildare	1,397	1,494	1,464	1,517	1,281
Meath	1,090	1,207	1,230	1,371	1,266
State	27,721	30,852	27,398	27,821	24,291

Source: Regional demographics and structural housing demand at a county level, ESRI, December 2020, <https://www.gov.ie/en/publication/eaa99-housing-need-and-demand-assessment-hnda/>

## Appendix 5 - Housing completion SDCC

New Dwelling Completion (Number) in South Dublin County Council Area										
Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
No. of New Dwellings	122	129	142	239	306	474	981	1,654	1,664	1,614

SDCC Actual Housebuilding to 2020 versus Projected Housing Need for Project Ireland 2040



Source: CSO and ESRI.

Appendix 6 – Comparisons of housing projections RPG 2016-2022 with NPF 2020-2031

Assessment of Impact on Housing Allocation Targets									
Local Authority	Current Development Plan Period	2016 Census Housing Units	RPG Housing allocation 2016-2022 (6yrs)	Annual Equivalent	Next Development Plan Period	ERSI NPF housing allocation 2020-2031 (12 yrs)	Annual Average	Difference in Allocation (Annual Average)	% Reduction in Allocation
South Dublin	2016 - 2022	115,373	22,575	3,763	2022 - 2028	17,736	1,478	-2,285	61%
Kildare	2017 - 2023	93,748	18,729	3,122	2023 - 2029	17,893	1,491	-1,630	52%
Meath	2013 - 2019	79,729	15,729	2,622	2021 - 2027	15,419	1,285	-1,337	51%

Sources: Regional Planning Guidelines 2010-2022 <https://emra.ie/dubh/wp-content/uploads/2015/02/Greater-Dublin-Area-Regional-Planning-Guidelines-2010-2022-Volume-1.pdf> and Regional demographics and structural housing demand at a county level, ESRI, December 2020, <https://www.gov.ie/en/publication/ea99-housing-need-and-demand-assessment-hnda/>

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