

Senior Executive Officer  
Forward Planning Section,  
Land Use Planning & Transportation Department,  
County Hall,  
Tallaght,  
Dublin 24

15<sup>th</sup> September 2021

**RE: SUBMISSION ON DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028 WITH RESPECT TO LANDS ADJOINING TO THE SOUTH AND SOUTHWEST OF ADAMSTOWN, LUCAN, CO. DUBLIN.**

Dear Sir/Madam,

We, Castlethorn Construction, Main Street, Dundrum, Dublin 14, hereby make this submission on behalf of the Crowley family, c/o T & H Crowley, [REDACTED], the owners of the subject lands at Ballymakilly, Gollierstown and Coolscuddan, adjoining to the south and southwest of Adamstown, Lucan, Co. Dublin as identified in Figure 1 below. This submission should be read in conjunction with the Pre-Draft Submission as prepared by Stephen Little & Associates on our behalf and dated 28<sup>th</sup> September 2020.

Castlethorn is a long established and design-led residential developer with a proven track record in developing sustainable new communities across the Greater Dublin Area focussed in particular on high-quality public transport. We were central in the development of Adamstown in the early 2000s and worked with South Dublin County Council in the preparation of the original SDZ Planning Scheme and an earlier Local Area Plan for Adamstown. We have delivered in excess of 1,500 homes in Adamstown together with the full range of physical and social infrastructure that accompanied these initial phases, and we watch with interest as Adamstown is further progressed at pace by third party developers towards the realisation of the overall SDZ Masterplan vision for these strategic lands. Considerable pre-existing infrastructural investment and further public and private capital investment has facilitated Adamstown in further reaching its potential as an exemplar of a truly sustainable new rail-based settlement supported by the full range of physical and social infrastructure.

The plans accompanying this submission have been prepared by O'Mahony Pike Architects and there have been inputs also to this submission by Stephen Little & Associates Planning and Development Consultants.

## 1. PLANNING CONTEXT OF ADAMSTOWN SOUTH LANDS

The subject lands at Adamstown South comprise of some 175 Ha of undeveloped 'greenfield' lands bounded by the Dublin-Kildare Railway line to the north, the Grand Canal to the south, Adamstown Business Park and Lucan Sarsfields GAA Grounds to the east and broadly by the County boundary with Kildare to the west. It is a considerable landholding in the single majority ownership of the Crowley family. CIE own some 12 Ha of

this landbank to the northwest adjoining the railway line. The Adamstown South lands are currently unzoned, subject to an 'RU' Rural & Agriculture Zoning Objective.

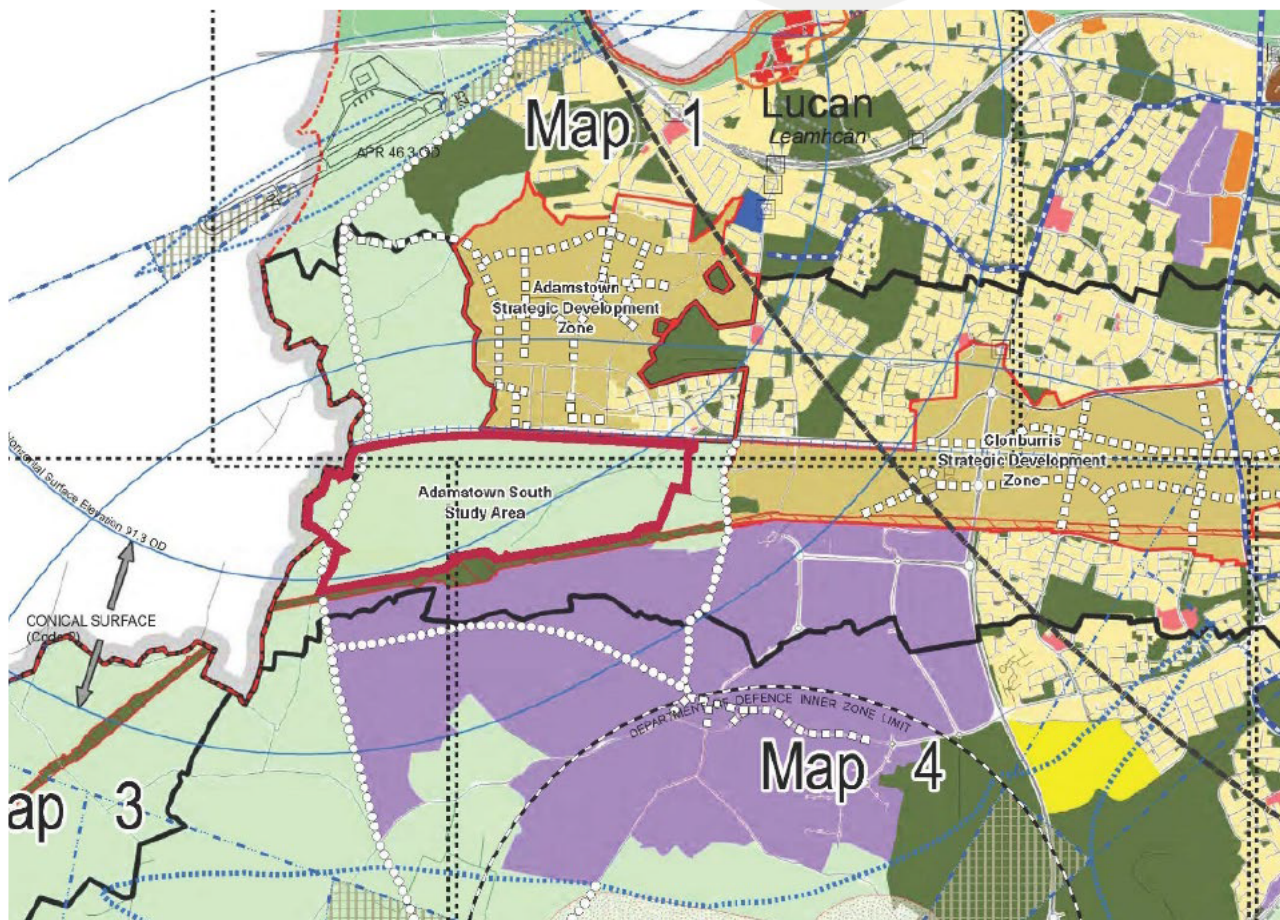


Figure 1: Land Use Planning Context of Adamstown South Lands (outlined in red)

## 1.1 National and Regional Planning Policy

National and Regional planning policy as set out within the National Planning Framework (NPF) and the Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Regional Assembly places great emphasis on the need for compact growth in the Dublin Metropolitan Area that is supported by existing and planned transport infrastructure. The subject lands are located within the Metropolitan Area and situated at the edge of, directly adjoining, Dublin City & Suburbs as indicated in Figure 5.1 of the RSES, which notably also appears to exclude the western part of Adamstown SDZ and all of Clonburris SDZ as it is based simply on the footprint of existing built-up areas.

The western suburbs including Adamstown and Clonburris is confirmed as forming part of Dublin City and Suburbs under Section 4.4 of the RSES. Strategic development corridors are identified within the Metropolitan Area with the South-West Corridor of direct relevance to the subject lands. The stated focus therein is:

*"The consolidation of the western suburbs of Clonburris, Kilcarberry and Adamstown, linked to increased capacity and electrified services on the Kildare line, to be delivered by 2027, and at Grangecastle supported by additional bus connections. Brownfield regeneration lands at Naas Road and Tallaght and new residential communities at Fortunestown, supported by the Luas redline." (Our underscore emphasis)*

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Figure 2: Extract from EMRA Regional Spatial & Economic Strategy

The RSES sets out a clear Settlement Hierarchy for the Region placing Dublin City and Suburbs top of the hierarchy (Tier 1) followed by the Regional Growth Centres of Dundalk, Drogheda and Athlone (Tier 2) and Key Towns such as Swords, Navan, Maynooth and Bray (Tier 3). The pre-eminence of Tier 1 is reinforced by the noted NPF target of achieving compact growth with 50% of housing within the Metropolitan Area to be provided *“within or contiguous to”* the built-up area of Dublin City and Suburbs.

The RSES recognises the importance of Grange Castle Business Park for high tech, manufacturing and research and development and notes under Table 5.1 that improved public transport and access is required for Grange Castle as key enabling infrastructure. New roads, railway bridge and the DART expansion to Celbridge-Hazelhatch is noted as enabling infrastructure of relevance to Adamstown and Clonburris.

At a broader level, the NPF identifies the following as a key future growth enabler for Dublin:

*“Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburris and Clongriffin.”* (Our underscore emphasis)

This is elaborated upon further by reference to National Policy Objective NPO 33 to:

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

It is submitted that Adamstown South, located as it is within and/or contiguous to Dublin City and Suburbs and situated as it is on the Kildare Commuter Rail Line and served by the immediately adjoining and existing Adamstown Railway Station is a most sustainable and policy compliant greenfield location to accommodate new residential-led development of scale and could serve as an exemplar of truly integrated land use and transportation planning and create synergy between adjoining land uses. This will be elaborated upon later in this submission.

## 1.2 National Capital Investment in Suburban Rail / DART

The DART+ Programme was published in August 2020 and aims to substantially improve existing rail services in the Greater Dublin Area (GDA). The DART+ Programme is included in The National Development Plan 2018 – 2027; Transport Strategy for Greater Dublin Area 2016 – 2035 and The Climate Action Plan 2019. The National Development Plan in particular sets out State investment priorities which will underpin the successful implementation of the NPF.

DART+ will provide for the electrification of services from Dublin City Centre to Drogheda on the Northern Line, to Hazelhatch / Celbridge on the Kildare Line, to Maynooth on the Sligo Line, and the improvement of the South-East Line as far as Greystones. This will significantly increase the capacity and frequency of existing rail services along these lines. The DART+ South West Project deals specifically with the Kildare Line. The envisaged capital cost of the DART+ Programme is some €2.6bn.

DART+ South West will increase train capacity from the current 12 trains per hour per direction to 23 trains per hour per direction and will increase peak passenger capacity from approximately 5,000 passengers per hour per direction to approximately 20,000 passengers per hour per direction. A key stated benefit, in addition to reduced carbon emissions through the deployment of new electric trains, is to:

*“Support growing communities, businesses and future development by providing high-quality integrated public transport services in line with Government policy including the National Planning Framework and Climate Action Plan.”* (Our underscore emphasis)

The project also involves widening of the railway corridor for four-tracking between Park West & Cherry Orchard Station and Heuston Station. The Kildare line already benefits from a four-track line between Cherry Orchard and Hazelhatch thus allowing for the separation of commuter rail from InterCity services thus facilitating greater frequency of both InterCity and commuter rail services to the City Centre, which extend as far as Grand Canal Dock since the opening of the Phoenix Park tunnel in 2016. DART+ South West represents an unprecedented capital investment in the Kildare Railway Line which very much supports the NPF objective of consolidation of these western suburbs to capitalise on this considerable State investment.

## 1.3 Core Strategy of the Draft South Dublin County Development Plan 2022-2028

We note the Core Strategy position as set out in detail in the Draft County Development Plan and supporting Appendices. It estimates an overall requirement of 17,817 units between 2021 and 2028 or a net need for some 13,260 new homes allowing for some 4,557 homes currently under construction. Table 10 sets out the allocation of these new homes across the various settlements with the focus rightly on highest order Dublin City and Suburbs settlements including Lucan, Adamstown & Palmerstown as well as Clondalkin, Clonburris & Grange Castle with these two amalgamated settlements combined accounting for almost 50% of that overall County housing allocation (8,707 units).

The Core Strategy analyses Total Land Capacity of zoned lands across the County and indicates some 1,039 Ha with the potential to accommodate 44,472 units. Most of the Long-Term Strategic Lands comprising part of the SDZs (Adamstown and Clonburris) and particularly the Regeneration Lands (at Naas Road and Tallaght) are discounted from consideration under this forthcoming County Development Plan, as allowed for under the 2010 Core Strategy Guidelines, to give a stated effective land capacity of 477 Ha with potential to accommodate 23,731 units. It is noted further to an Infrastructure Assessment that all of these lands qualify as either Tier 1 or Tier 2 Lands and it is acknowledged that for various reasons zoned and serviced lands and indeed permitted developments will not always progress to construction hence that level of ‘overprovision’ in terms of zoned lands is considered necessary to provide flexibility under the forthcoming County Development Plan and the role of the Council’s Land Management and monitoring functions during the life of the Development Plan is further noted.

## 1.4 Most recent National Housing Supply Analysis and National Policy Imperatives

In December 2020, the Department of Housing, Local Government and Heritage published guidelines entitled ‘*Housing Supply Target Methodology for Development Planning*’. Allied to this, the Minister for Housing,

Local Government and Heritage issued a letter accompanying these latest Guidelines. This follows an assessment by the ESRI of housing need in the period 2017–2040.

Significantly, what the ESRI analysis has shown is that the State needs a baseline of 28,000 new homes every year from 2017 to 2040, which is line with the provisions set down in the NPF. The ESRI however have also undertaken an up-to-date assessment of housing supply which has considered a number of factors which together comprise the existing housing demand, and these include:

- *the most up-to-date data available regarding homeless households, and estimated unmet demand based on Census 2016;*
- *the difference between actual housing supply in terms of new homes completed (i.e. CSO housing completion data), and*
- *ESRI projected household demand for the full years for which data is available from 2017 – 2019.*

The Minister's Letter then goes on to explain that: -

*"When all of these factors are included, total projected new household demand for the baseline and NPF projections is almost 31,000 new households per annum every year from 2020 to 2040. However, it is not envisaged that the timeline for meeting all projected housing demand would extend over the full period to 2040."*

In light of the acknowledged 'pent-up' demand for housing that exists at present, the Minister goes on to set out a requirement for just over 33,000 new homes per annum over the period 2020-2031. This amounts to an almost 20% increase annually for a period of 11 years over and above that provided for in the NPF just to meet current demand.

The CSO statistics for house completions in 2020 shows just 21,087 units completed in 2019 and even less at 20,676 units in 2020. There was consequently a 37% shortfall in the required dwelling completions to meet the revised housing demand identified by the Minister and the ESRI; or a shortfall of 12,324 dwellings in a single year (2020). Estimates for housing completions for 2021 show a shortfall from the Minister's target of somewhere between 15,000 and 20,000 homes and thus it will likely take up to three years to begin to recover lost ground and start achieving the required average target levels of housing output per annum.

The critical need to take renewed, innovative and substantive measures to try to tackle this ongoing housing crisis and lack of housing supply and choice has precipitated the recent Government publication of **'Housing for All - A New Housing Plan for Ireland'**. The overall aim of this new housing plan is that:

*"Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life."*

The plan identifies four pathways to achieve the four overarching objectives of:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

It is the third pathway of the plan that is of most relevance to this submission. The **'Housing for All'** plan commits to a capital spend in excess of €4bn per annum and commits to the development of over 300,000 new homes by 2030 i.e. at least 33,000 units per annum on average in line with the latest ESRI estimates of need. A range of measures are proposed to increase supply with that simple lack of supply to meet demand acknowledged as a fundamental problem.

The Government commit to mobilising its own land primarily through the Land Development Agency (LDA) and to also support private supply by direct activation measures and new land management powers as well as by initiatives to tackle viability issues around higher density apartments. Broad reforms of the planning system have also been initiated with Large Scale Residential Developments (LSRDs) intended to replace Strategic Housing Developments (SHDs) with the role of the Planning Authority strengthened in the decision-making process. Urban Development Zones are also proposed as a similar plan-led and active

development agency approach to that of Strategic Development Zones (SDZs) with a similarly streamlined decision-making process but with a focus on urban and brownfield lands.

The 'Housing for All' plan acknowledges that there are some 40,000 residential units in Dublin with planning permission that have not commenced with viability and affordability issues around higher density apartments a real issue. It is further acknowledged that it may be necessary for a Local Authority to zone more serviced land in a development plan than would equate to meeting the projected housing demand for that settlement in order to provide choice in sites locally and resilience in housing supply coming forward. It is stated that updated Development Plan Guidelines for Planning Authorities are due out by the end of 2021, which will provide guidance on this issue. We would welcome this and further submit that a development plan should look beyond the statutory 6-year cycle and seek to identify key residential landbanks of greatest potential to meet national and regional policy objectives for compact, sustainable and sequential development served by high quality public transport and with convenient access to existing and planned employment, social infrastructure and recreational amenities whether such lands are zoned or not. That we submit is the intention of Appendix 3 of the NPF with its advocated tiered approach to residential zoning based on availability and capacity of existing supporting infrastructure and location within or sequential to existing settlements and development areas. This we would argue should be conducted from first principles and not simply form an assessment of existing zoned lands to demonstrate compliance.

The long lead-in time from designation / zoning of a strategic landbank for residential development to first occupations and housing delivery of scale takes many years, as evidenced at both Adamstown and Clonburris and any other similar landbank across the GDA. It is therefore essential that suitable lands of scale are identified now under this forthcoming County Development Plan in order to facilitate the requisite plan preparation and identification of necessary services during the life of this Development Plan so that such lands can begin delivering homes under subsequent Development Plan cycles.

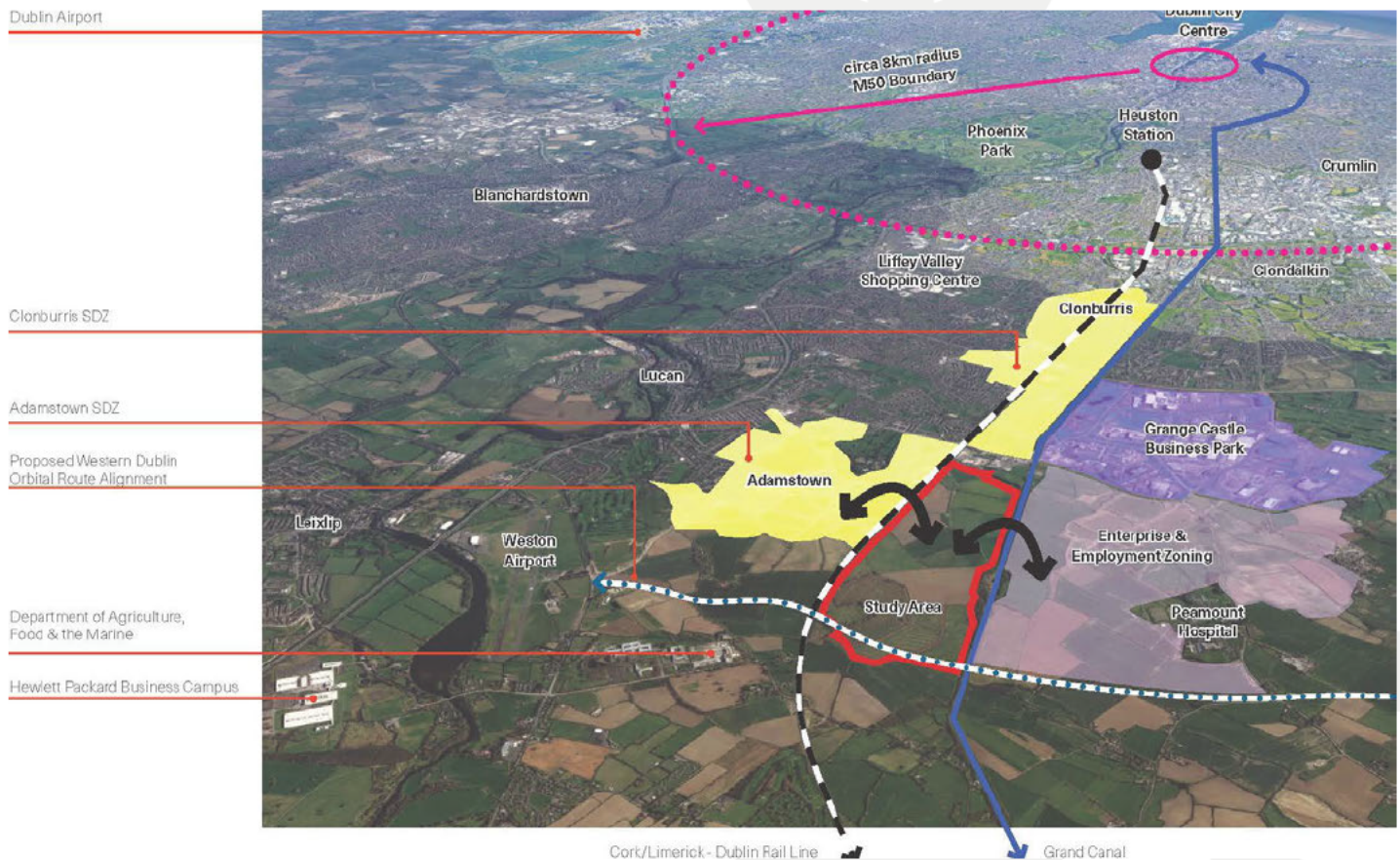
## **2 THE CASE FOR ADAMSTOWN SOUTH AS A STRATEGIC LAND RESERVE AND POTENTIAL STRATEGIC DEVELOPMENT ZONE (SDZ)**

Adamstown South is strategically positioned between two major districts of national significance in South Dublin, comprising of Adamstown adjoining to the north and the massively expanding employment district of Grange Castle adjoining to the south. It is also adjoined by the Dublin-Kildare Railway Line to the north and the Grand Canal to the south, which provide excellent public transport and recreational amenity and cycle links to these lands.

Adamstown was the first, is the furthest progressed and is widely recognised as the most successful of the nationally significant Strategic Development Zones (SDZs) designated in the State. It is the exemplar of a sustainable and planned 'new town' model of major scale residential delivery. Over 3,000 homes have been delivered in Adamstown to-date with at least a further 2,000 dwellings permitted on-site or under active consideration. Development has also finally commenced on the first phase of Adamstown District Centre and Airlie and Tandy's Lane regional parks have been completed. There has been considerable investment in physical and social infrastructure at Adamstown with much of that physical infrastructure designed with the ultimate intention and capacity to serve not just the designated SDZ lands but substantial adjoining lands at Adamstown South. Adamstown Railway Station sits naturally on the railway line at the southern edge of Adamstown and its emerging District Centre will adjoin the station on the northern side of the railway line, immediately proximate to Adamstown South.

Grange Castle is the premier employment district in the County and is home to some of the world's largest companies including Google, Microsoft, Arysza, Takeda, Interxion, Pfizer and Grifols with billions of euros of investment there to-date and thousands of employees working at Grange Castle. Considerable additional lands have been zoned for Enterprise and Employment purposes to facilitate the western expansion of Grange Castle and significant new roads and services infrastructure has been completed and is further progressing to accommodate this western expansion with major development proposals being advanced, for example, by Lens Media (a 48-acre media campus) and Edge Connex (a major data centre) in this area. It is worth noting that the Crowley family own an additional c. 45 Ha of these new Enterprise & Employment zoned lands centrally located between the subject Adamstown South lands and the recently completed R134 New Nangor Road extension west across these Enterprise & Employment zoned lands. This should naturally simplify the realisation of potential north/south links across the Canal between these landholdings.

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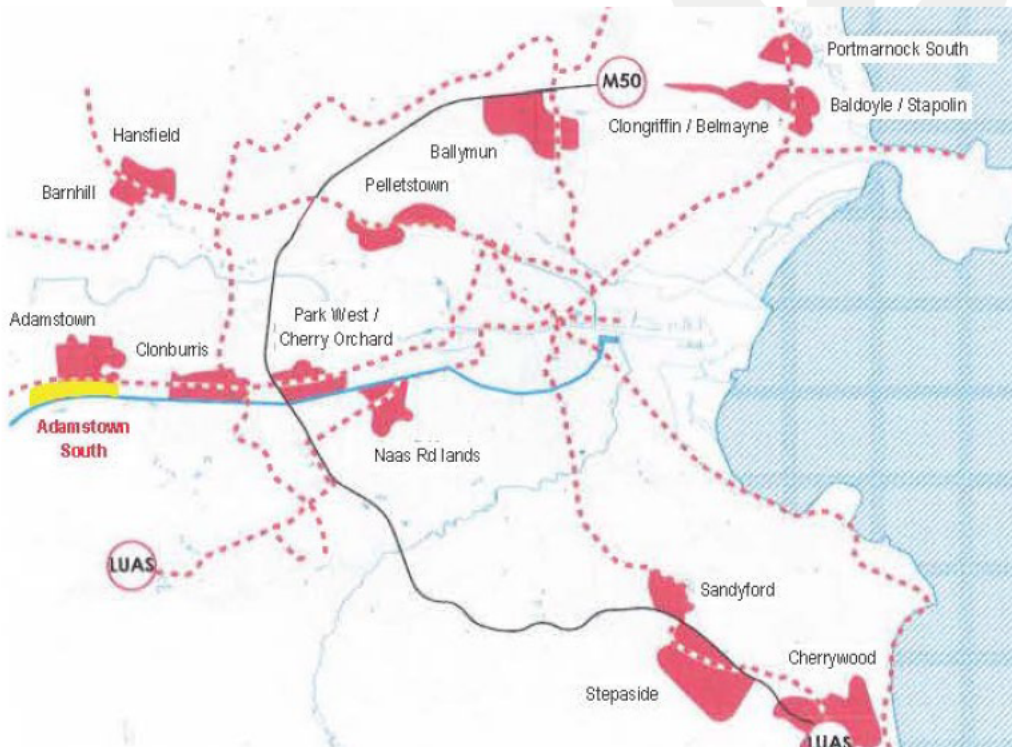


**Figure 3: Adamstown South Spatial Context**

Adamstown South is the most strategically significant and spatially sequential landbank to avail of convenient access to the existing Adamstown Railway Station and the emerging Adamstown District Centre located at the southern edge of the SDZ lands. Adamstown is somewhat anomalous in the Greater Dublin Area as a major planned rail-based residential district (in a non-coastal location) that comprises of a zoned landbank that is located entirely to one side of the commuter railway corridor which serves it. Comparable landbanks such as Clonburris, Hansfield/Barnhill, Clongriffin, Cherrywood etc. are all bisected by rail.

Development at Adamstown South would considerably increase the catchment and fully capitalise on the considerable and ongoing State investment in public transport and other physical and social infrastructure at Adamstown.

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**Figure 4:** *Consideration of Comparable Rail-Based Strategic Settlements*

Adamstown Railway Station is a flagship railway station of a podium design intended to be equally accessible from north and south. It benefits from the completed 4-track Kildare Route Project allowing separation of the InterCity Dublin to Cork Service from the more frequent Kildare commuter rail service. Adamstown Railway Station has been designed to cater for up to 3,000 commuting passengers utilising the station at the peak hour and it will benefit hugely from the planned DART+ electrification of the rail line to Hazelhatch due to become operational in 2026, which will double the frequency and quadruple the capacity of the commuter service to and from Adamstown.

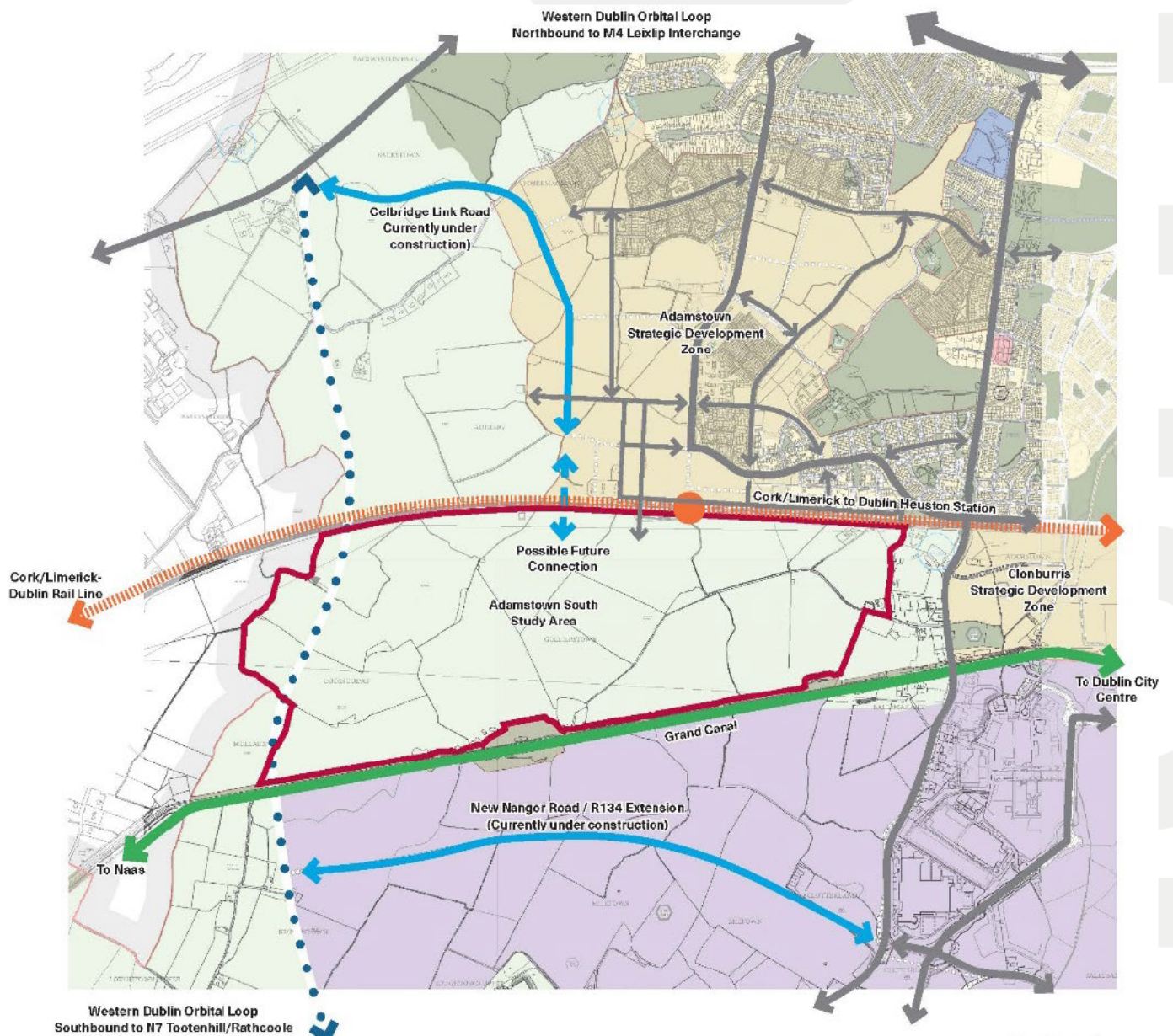


**Figure 5:** *Adamstown Railway Station*

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The development of Adamstown South as a purpose-planned new settlement will facilitate the provision of direct and dedicated pedestrian and cycle connections from Adamstown to Grange Castle. The railway line, these undeveloped agricultural lands and the Grand Canal currently serve as barriers to movement between the strategic residential district of Adamstown and the major employment district at Grange Castle. Such linkages would facilitate much more sustainable travel patterns in the region and would also make the Grand Canal corridor accessible as a recreational amenity and greenway corridor to an adjoining major residential district comprising of Adamstown and Adamstown South.

The Grand Canal Green Route currently runs from Griffeen Avenue to Davitt Road in Inchicore which could naturally be extended further west along the common canal frontage of Adamstown South to the north and Grange Castle to the south. This much more accessible and passively supervised Grand Canal Greenway would be a major recreational asset for the area and an attractive means of commuting by bicycle to and from the City Centre.



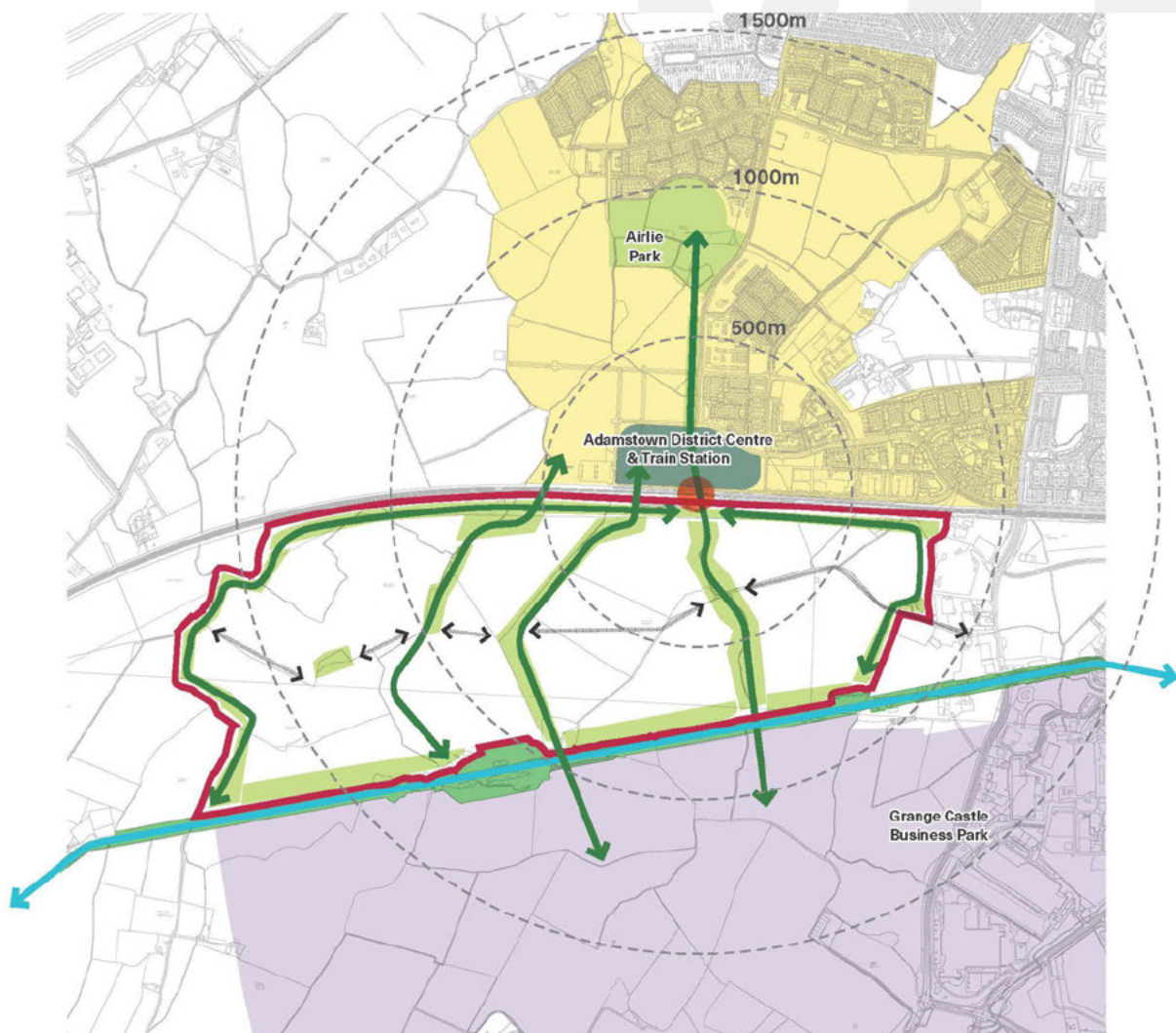
**Figure 6:** Adamstown South Existing and Planned Roads, Rail and Canal Infrastructure

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Development of Adamstown South and its direct pedestrian and cycle linkages between Adamstown and Grange Castle would naturally make Grange Castle much more conveniently accessible to the high frequency and high-capacity commuter rail services at Adamstown Railway Station. Grange Castle Business Park is located c. 1.2km from Adamstown Railway Station with the western Enterprise & Employment zoned lands c. 800m in distance from the station. High-quality dedicated north/south pedestrian and cycle corridors through Adamstown South would make a rail commute to Grange Castle a feasible, attractive and highly sustainable means of commuting to work for a considerable catchment of workers in the business park that live along this key railway corridor between Kildare and Dublin City Centre.

The EMRA Regional Spatial and Economic Strategy notes the need for improved public transport access to Grange Castle and we would submit that Adamstown South is the 'missing link' in achieving more sustainable and integrated land use and transportation planning in an expanded and nationally significant mixed use district comprising Adamstown, Adamstown South and Grange Castle.

Development of Adamstown South would also facilitate delivery of the adjoining section of the Western Dublin Orbital Route connecting the N7 to the south with the Celbridge Road and M4 to the north. This is a Long-Term Roads Objective in the Development Plan, which could be expedited through the development of the Adamstown South landbank. The northern section of this road would open up not just Adamstown and Adamstown South but also Grange Castle to the M4 Motorway and Celbridge Interchange alleviating congestion in the existing road network and making these employment lands much more accessible to the wider region.



**Figure 7: Adamstown South Indicative Outline Movement and Connectivity**

Development at Adamstown South, in accordance with a detailed Local Area Plan or SDZ Planning Scheme, could build on the urban design quality and place-making success of Adamstown SDZ whilst responding to its unique landscape context, fronting the Grand Canal, and location adjacent to Adamstown District Centre. It would accommodate a range of supporting facilities and amenities at likely neighbourhood level to include parks, playgrounds, schools, creches, community facilities, convenience retail, cafes/restaurants, doctors/dentists' surgeries etc. Such facilities would serve the local population including employees within Grange Castle and complement rather than compete with the higher order offer of Adamstown District Centre.

Development could be laid out across a network of interconnected green corridors and landscape linkages to prioritise pedestrian and cycle movements and ensure exceptional permeability with Adamstown to the north and Grange Castle to the south. Adamstown South would represent a true '15-minute city' district with major employment, retail/commercial, education, health, community and recreational facilities within and on its doorstep as well as immediately accessible high quality public transport. It would be a highly desirable location in which to live, and its development could realise much closer integration between Adamstown and Grange Castle as part of a consolidated and expanded mixed-use district centred on Adamstown South. In so doing it would create great synergy between adjacent residential and employment districts and represent truly integrated land use and transportation planning within these western suburbs.

### 3 CONCLUSIONS

Adamstown South is ideally placed as a highly sustainable and strategically located landbank of scale to help meet the medium to long term need for substantial additional housing in South Dublin County, the Metropolitan Area and within the State generally. It is exceptionally well located immediately adjoining the Dublin-Kildare Railway Line and its existing high capacity and highly accessible railway station at Adamstown and will benefit from the massive DART+ Programme of capital investment to electrify this line and considerably increase the frequency and capacity of commuter rail services. It is also uniquely positioned between the major 'new town' settlement of Adamstown to the north with its emerging and immediately adjacent new District Centre and associated physical and social infrastructure and the premier employment centre of Grange Castle Business Park expanding to the south.

These lands are unparalleled in terms of its highly sustainable location and would help significantly advance NPF and RSES objectives to consolidate these western Dublin suburbs along the Kildare Commuter Railway Line. These lands also front onto and would open up access to, and across, the Grand Canal thus facilitating direct vehicular, pedestrian and cycle links between Adamstown and Grange Castle and pedestrian and cycle links along the Grand Canal Greenway to and from the City Centre. They are held in single family ownership, which should serve as a major advantage in facilitating their timely realisation as a major new residential settlement.

We firmly believe and would respectfully submit that the subject lands at Adamstown South are eminently suited to be designated as the next nationally significant Strategic Development Zone (SDZ). The NPF specifically calls for sustainable development of new greenfield areas for housing, especially those on public transport corridors, as a key future growth enabler for Dublin. The pressing need for bold and substantive measures to help tackle the ongoing housing crisis has been underscored by recent ESRI estimates regarding housing need and by the recent Government publication of its 'Housing for All' plan. The 'Housing for All' plan represents a detailed and very ambitious Government commitment to deal with a range of issues not least of which is the crucial need for an increased and steady supply of housing going forward. It recognises the crucial need to facilitate zoned and implementable residential lands beyond that strictly required by reference to the NPF/RSES County housing allocations in order to facilitate choice and ensure resilience of a continuous housing supply. Further Departmental guidance is due shortly in this regard and is a particularly important point in our minds.

We would submit that the SDZ process remains a very appropriate and successful model for delivery of residential development of scale. This is evident by reference to Adamstown, which should be nearing completion by the end of the forthcoming 2022-2028 County Development Plan cycle. It has however unquestionably a long lead-in time from designation / re-zoning to plan preparation to realisation of enabling infrastructure and ultimate commencement of and occupation of any critical mass of residential dwellings. Clonburris enabling infrastructure has now finally been permitted and substantial LIHAF funding made

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available which should facilitate significant housing delivery across this landbank over the coming years. Notwithstanding some of the creative and proactive initiatives under 'Housing for All', major urban regeneration of scale across brownfield lands in a multiplicity of ownerships will inevitably be a much slower and more incremental process over very many years, as evidenced by the very recently published 'City Edge Project' initiative for Naas Road / Ballymount / Park West and its 40–50-year horizon for full realisation.

We hereby respectfully request the Planning Authority to formally recognise the strategic significance of Adamstown South by designating it as a **Strategic Land Reserve** under the forthcoming South Dublin County Development Plan 2022-2028 with a commitment to pursue its designation as a Strategic Development Zone (SDZ) and accordingly to advance a Planning Scheme for this landbank during the life of the forthcoming County Development Plan. We would respectfully request a parallel commitment should these lands for whatever reason not be designated as an SDZ that they alternatively be advanced by way of a proposed Variation to be rezoned as Residential to be developed in accordance with an approved Local Area Plan and to seek to prepare that LAP during the life of the forthcoming County Development Plan.

The aforementioned commitment as requested in this forthcoming County Development Plan would enable Adamstown South to come on stream and start delivering much needed sustainable new housing under subsequent County Development Plan cycles. It would not in any way affect the housing allocations under the draft Core Strategy. We would strongly contend that now is the time to act to prevent a situation of a significant slowdown in housing supply being realised within South Dublin and becoming evident at the time of the next County Development Plan Review by which time it would be too late for Adamstown South to contribute meaningfully to housing delivery within the short to medium term.

We trust that due consideration will be given to the points made in this submission and confirm our availability to meet with and/or discuss any aspects of this submission with South Dublin County Council.

Yours faithfully,

*This letter does not bear a signature  
as it was transmitted electronically*

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James Leonard  
Chartered Town Planner and Project Manager  
Castlethorn Construction