



South Dublin County Development Plan 2022-2028

Proposed Material Alterations to Proposed Variation No. 2

NPF Implementation Housing Growth Requirements and Compact Settlement Guidelines

**Chief Executive's Report
September 2026**

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List of Acronyms

AA – Appropriate Assessment
ABP – An Bord Pleanála
ABTA – Area-Based Transport Assessment
ACP – An Coimisiún Pleanála
CDP – County Development Plan
CE – Chief Executive
CFRAM - Catchment Flood Risk Assessment and Management
CIEEM - Chartered Institute of Ecology and Environmental Management
DHLGH – Department of Housing, Local Government and Heritage
DMURS – Design Manual for Urban Roads and Streets
DoEY – Department of Education and Youth
EclA – Ecological Impact Assessment
EPA - Environmental Protection Agency
FAS – Flood Alleviation Scheme
FRA – Flood Risk Assessment
GDATS – Greater Dublin Area Transport Strategy
GI – Green Infrastructure
HA-LV - High Amenity Liffey Valley
HEFS - High-End Future Scenario (flooding)
MA – Material Alteration
MRC – Major Retail Centre
NIR – Natura Impact Report
NPF – National Planning Framework
NRP – Nature Restoration Plan
NRR – Nature Restoration Regulation
NTA – National Transport Authority
NPO – National Policy Objective
OS - Ordnance Survey and/or Open Space
OPR – Office of the Planning Regulator
OPW – Office of Public Works

RES – Existing Residential
RES-N – New Residential
RPS – Protected Structure
RSES – Regional Spatial and Economic Strategy
RU – Rural
SAAO - Special Amenity Area Order
SCA – Settlement Capacity Audit
SDA – Strategic Development Area
SDCC – South Dublin County Council
SDZ – Strategic Development Zone
SEA – Strategic Environmental Assessment
SFRA – Strategic Flood Risk Assessment
SLO – Specific Local Objective
SuDS – Sustainable Urban Drainage Systems
TII – Transport Infrastructure Ireland
TOD – Transport Orientated Development
WWTP – Wastewater Treatment Plant

Section 1 - Introduction

1.1 Overview – Material Alterations

The following Chief Executive's report relates to the issues raised in submissions and observations received from members of the public, prescribed authorities and other stakeholders following the publication of the Proposed Material Alterations to Proposed Variation No. 2 to the South Dublin County Development Plan 2022 – 2028. The process of preparing a Variation to the County Development Plan 2022-2028 has been undertaken under Section 58 of the Planning and Development Act 2024 (as amended).

1.2 Context

Proposed Variation No. 2 to the South Dublin County Development Plan 2022–2028 is to respond to the recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of associated Section 28 Guidelines and other guidelines published since the adoption of the County Development Plan in June 2022, primarily:

- NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities, 2025 and
- Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities 2024.

In addressing the new housing growth requirements and other changes to National planning policy, the draft variation proposed changes to the written statement, maps and appendices of the South Dublin County Development Plan 2022-2028 to address specific immediate updates that are needed to implement national policy.

In accordance with Section 58 (7) and (8) of the Planning and Development Act 2024 (as amended), the Proposed Variation No. 2 and the Draft Environmental Reports were put on public display between 13th February 2026 and 13th March 2026. A Chief Executive's Report on submissions and observations to the proposed variation was prepared and submitted to the Elected Members of South Dublin County Council for their consideration at Special Meetings of the Council on the 19th and 24th June 2026.

1.3 Special Meeting Outcome

At the Special Council meetings, it was resolved by the Elected Members to alter Variation No. 2 to the South Dublin County Development Plan 2022-2028. As a number of these alterations constituted a material alteration (MA) to the proposed variation, the proposed material alterations were subject to further public consultation. The following are the outcomes of Amendments 1 to 23, including the additional lands proposed through motions 179 and 180 at Cornerpark (Haughan's Field), Newcastle and Elmcastle Court, Kilnamanagh.

Amendment No. / Name	OPR Recommendation	Outcome of Meeting
1 Ballynakelly, Newcastle	Progress the Zoning	Zone Lands – Amend / Add SLOs
2 Adamstown SDZ West	Progress the Zoning	Zone Lands – Amend / Add SLOs
3 Finnstown Castle	Progress the Zoning	Reject zoning
4 Tubber Lane North	Progress the Zoning	Zone Lands – Amend / Add SLOs
5 Citywest	Progress the Zoning	Zone Lands – Amend / Add SLOs
6 St. Edmundsbury	Progress the Zoning	Reject zoning
7 Edmondstown Road	Progress the Zoning	Zone Lands – Amend / Add SLOs
8 Kiltipper Road	Progress the Zoning	Zone Lands – Add SLO
9 Knockmeenagh Framework Site	Progress the Zoning	Zone Lands – Amend / Add SLOs
10 Stonewall	Progress the Zoning	Zone Lands – Add SLO
11 Coldcut Road	Progress the Zoning	Reject zoning
12 Cherryfield Way	Progress the Zoning	Zone Lands – Add SLO
13 Rathcoole	Progress the Zoning	Zone Lands – Add SLO
14 Foxhunter	Progress the Zoning	Zone Lands – Add SLOs
15 Ninth Lock Road	Progress the Zoning	Zone Lands – Add SLO
16 Liffey Valley MRC	Progress the Zoning	Amend Zoning Matrix – Add SLO
17 Adamstown South and West (Outer) (SDA)	N/A	Designate as SDA – Amend / Add SLOs
18 Grange Castle (SDA)	N/A	Designate as SDA – Amend SLO
19 Newlands (SDA)	N/A	Reject SDA designation
20 Belgard Road (SDA)	N/A	Designate as SDA – Amend / Add SLOs
21 Stocking Avenue, Ballycullen (School Reservation)	N/A	Agree proposed amendment (designation removed)
22 Whitechurch-Edmondstown (Road Upgrade)	N/A	Agree proposed amendment
23 Whitechurch-Edmondstown (Connecting Road)	N/A	Agree proposed amendment
New Lands*	OPR Recommendation	Outcome of Meeting
Cornerpark, Newcastle (Haughton's Field)	N/A	Zone Lands with SLO
Elmcastle Court, Kilnamanagh	N/A	Zone Lands

**Lands not originally included in the Proposed Variation lands.*

Amendments 24 to 64 relating to the Written Statement were also considered as part of the special meetings. The following was the outcome:

Amendment Nos. 24, 25, 26, 27, 28, 30, 31, 33, 34, 35, 36, 37, 38, 39, 40, 41, 43, 44, 45, 46, 47, 50, 51, 52, 53, 54, 56, 57, 58, 59, 60, 61, 64 were all agreed.

It was resolved to Materially alter Proposed Variation Amendment Nos 29, 32, 42, 48, 49, 55, 62, 63.

1.4 Public Consultation Process

In accordance with Section 58 (13) of the Planning and Development Act 2024 (as amended), the Proposed Material Alterations to Proposed Variation No. 2 to the South Dublin County Development Plan 2022 – 2028 were published for public consultation from Tuesday 7th July to Wednesday 5th August 2026 inclusive. Public notices notifying members of the public that the Proposed Variation was on public display were published in the Irish Times (English and Irish) and in the Tallaght Echo (English) and on the Council's website. The material alterations to the Variation, supporting documentation and environmental assessments were published on the Council's consultation portal inviting written observations and submissions, in accordance with Section 58(13)(f) of the Planning and Development Act 2024.

Public consultation on the Variation was also promoted through the Council's social media and was made available to view at Lucan Library and County Hall, Tallaght during normal opening hours (excluding public holidays). 1,710 submissions were received in total on the Proposed Variation within the consultation period.

In accordance with Section 58 (14) of the Planning and Development Act 2024, as amended, written submissions and observations were published on the website of the authority within 10 working days of their receipt.

In accordance with Section 58(13)(b) and Section 58(13)(c) of the Planning and Development Act 2024 (as amended), South Dublin County Council has determined that a Strategic Environmental Assessment (SEA) is not required and that an Appropriate Assessment (AA) is not required with respect to the proposed material alterations.

Statutory Bodies

Under Section 58 (13)(a)(ii) of the Planning and Development Act 2024 (as amended) the Planning Authority is required to send notice of the material alterations to the proposed variation to the prescribed authorities listed within that section.

Responses were received from statutory bodies and have been responded to by the Chief Executive, as set out below in this report.

Consultation Responses and Scope of Response

As per Section 58(15)(c)(ii)(IV), only submissions or observations made in respect of the proposed material alterations and accompanying documents

(including submissions relating to the likely significant effects on the environment of implementing the proposed Material Alterations) are required to be taken into consideration before the making of any material alteration to Variation No. 2 to the South Dublin County Development Plan 2022-2028.

Submissions or observations in relation to other aspects of Proposed Variation No. 2 to the South Dublin County Development Plan 2022-2028 fall outside the scope of the alteration and therefore are not under consideration at this stage. These submissions/observations will be referred to as "out of scope" when referenced.

1.5 Purpose of the Chief Executive's Report and Process

Following the public consultation period, this Chief Executive's Report has been prepared on any issues raised in the submissions or observations received with respect to the Proposed Material Alterations of Proposed Variation No. 2 and accompanying documents. This report is submitted to the Elected Members of South Dublin County Council for their consideration. Members consider the Proposed Material Alterations and the Chief Executive's Report and will decide to make Variation No. 2 with or without the Proposed Material Alterations. At this stage of the process, only minor modifications can be made to the material alterations. In the alternative, Members may reject the Variation.

This Chief Executive's Report forms part of the statutory procedure for the preparation of the Variation, as required by Section 58 (15) of the Planning and Development Act, 2024 (as amended) and as required by the Act:

- Lists the persons who made submissions or observations.
- Summarises the recommendations and submissions made by the Office of the Planning Regulator (OPR) and the submission made by the National Transport Authority. [It is noted that no submission was made by the regional assembly EMRA, or by the Minister].
- Summarises the submissions made by any other persons and where considered appropriate grouping and summarising the issues raised in different submissions on a thematic basis.
- Contains the Chief Executive's response to the issues raised, and as required by section 58(c)(iii) taking account of the proper planning and sustainable development of the area, the statutory obligations of the planning authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- Sets out the recommendations of the chief executive as to how any recommendations made by the Office of the Planning Regulator in their submission should be dealt with; and
- Where required, includes the assessment of the chief executive of the proposed variation for the purposes of strategic environmental assessment or appropriate assessment, taking into account the submissions received.

Section 15 of Climate Action and Low Carbon Development Act 2015 includes duties of certain bodies. It is stated that a relevant body shall, in so far as practicable, perform its functions in a manner consistent with— (a) the most

recent approved national mitigation plan, (b) the most recent approved national adaptation framework and approved sectoral adaptation plans, (c) the furtherance of the national transition objective, and (d) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State. These relevant bodies include local authorities.

1.6 Structure of the Chief Executive's Report

The report is set out as follows:

Section 1 – Introduction

- 1.1 Overview
- 1.2 Context
- 1.3 Special Meeting Outcome
- 1.4 Public Consultation Process
- 1.5 Purpose of the Chief Executive's Report and Process
- 1.6 Structure of the Chief Executive's Report
- 1.7 Navigating the Chief Executive's Report
- 1.8 How to Read the Chief Executive's Recommendations

Section 2 – Summary of the Submissions from the Office of the Planning Regulator (OPR) and the National Transport Authority (NTA) and the Chief Executive's Response and Recommendation

- 2.1 Legislative Context
- 2.2 Overview of the Submission Made by the Office of the Planning Regulator (OPR) and the Chief Executive's Response and Recommendations
- 2.3 Overview of the Submission Made by the National Transport Authority (NTA) and the Chief Executive's Response and Recommendations

Section 3 – Summary of the Issues Raised by Other Persons and the Response and the Chief Executive's Response and Recommendation

This section orders the summaries, CE response and recommendations as follows:

- 3.1 Issues raised relating to the Proposed Material Alterations
- 3.2 Prescribed and Other Bodies - General Comments
- 3.3 Environmental Assessments
- 3.4 Out of Scope
- 3.5 Procedural Matters

Section 4 – Submissions List

List of Submissions

1.7 Navigating the Chief Executive's Report

In this Chief Executive's Report submissions have generally been grouped and summarised by theme under each Material Alteration (MA1.1, for example) followed by the Chief Executive's response and recommendation. The ordering is as set out above under Structure of the Report, Section 3.

Access to each submission in full is available through the relevant hyperlinks in this report where they relate to each summary section and through the list of submissions included as Section 4. Hyperlinked text is identifiable by an underline and will be either blue or black text.

1.8 How to Read the Chief Executive's Recommendations

The Chief Executive's recommendations as set out in this report are directly guided by the Planning and Development Act 2024 (as amended) and the provisions set out therein in respect to the Material Alterations stage of the variation process. Section 58 (17)(b) of the Act states that:

(b) Where the members of a planning authority decide to make the variation with the material alteration that was the subject of the notice under subsection (13), they may do so subject to any further minor modifications to the alteration that they consider appropriate.

(c) For the purposes of paragraph (b), a modification to the material alteration shall be deemed to be minor where it—

(i) does not substantially or materially alter the material alteration,

(ii) is not likely to have significant effects on the environment or on any European site, and

(iii) does not relate to—

(I) an increase in the area of land zoned for any purpose, or

(II) an addition to or deletion from the record of protected structures.

Therefore, having regard to Section 58 (17)(b) of the Act, the Chief Executive Recommendations, as set out thereunder in this report, are to either:

- Make the Variation **without** the proposed Material Alteration and retain the variation as originally published in February 2026
- Make the variation **with** the proposed material alteration
- Make the variation subject to a further minor modification to the proposed material alteration

Where recommendations include wording from the Material Alterations the text is shown in black **bold**.

Section 2 – Summary of the Submissions from the Office of the Planning Regulator (OPR) and the National Transport Authority (NTA) and the Chief Executive’s Response and Recommendations

2.1 Legislative Context

Section 58 (15) of the Planning and Development Act 2024 (as amended) requires the Chief Executive’s Report to make a summary of the recommendations and submissions made by the Minister and by the Office of the Planning Regulator (OPR), and the submissions of the National Transport Authority (NTA) and the relevant Regional Authority outlining the recommendations of the Chief Executive in response to the issues raised.

In view of this requirement, this part of the CE Report gives a response and recommendation to the issues raised by the OPR and the NTA in their submissions and sets out the recommendations of the Chief Executive.

In the interest of clarity, no submission was received from the regional authority or the Minister.

2.2 Overview of the Submission Made by the Office of the Planning Regulator (OPR) and Chief Executive's Response and Recommendations - [SD-C431-488 Office of the Planning Regulator](#)

Summary	CE Response and Recommendation
The functions of the Office of the Planning Regulator (OPR, the Office) are set out in the submission noting that a key function is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The OPR submission on the Variation is pursuant to Part 3 of the Planning and Development Act 2024 and its functions under section 546. The OPR made two recommendations and one observation in its submission relating to the proposed material alterations. It is noted that recommendations issued by the Office relate to clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations issued by the Office highlight areas where further clarification, justification, or refinement would strengthen the plan.	The Chief Executive notes the submission from the OPR including their functions, recommendations and observation as they relate to both the draft stage of the Variation and to this Material Alteration stage. The Planning Authority notes that Recommendations issued by the Office are stated to relate to clear inconsistencies with legislative provisions or national or regional policy frameworks. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions. The OPR's Recommendation 1 at the draft Variation stage stated: <i>'Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:</i> <i>• NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;</i> <i>• NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and</i> <i>• the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans, the Planning Authority is recommended to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation.'</i>

On adoption of the Variation, the OPR will assess it in accordance with the statutory framework in section 63 of the Act. The OPR notes the Planning Authority's letter which outlined the non-compliance with Recommendation 1 of the Office's submission at draft stage. The Office indicates that it fully supported the approach followed by the Planning Authority in preparing the proposed Variation, noting that an additional 156.5 ha of land was identified to meet the housing growth targets set out in the NPF Implementation: Housing Growth Requirements (2025). The Office remains of the view that these lands are required to support housing delivery and are well located to facilitate compact, sequential and connected residential development. The Office is concerned that the proposed material alterations, including reduced residential development capacity and additional housing delivery constraints that are not supported by sufficient evidence, risk undermining achievement of housing growth targets	In response to the OPR Recommendation during the draft stage, and as set out in the CE Report issued on the 20th May 2026, the Chief Executive's Recommendation was to: <i>'Progress to make the Variation including amendments no. 1 to no. 16.'</i> Subsequently, following the Special Council meetings on the 19th and 24th June 2026, and having considered the Proposed Variation No. 2 to the County Development Plan 2022-2028 and the Chief Executive's Report in respect of submissions / observations received, the Elected Members of South Dublin County Council resolved in accordance with Section 58(13)(a)(ii) of the Planning and Development Act 2024 (as amended), to propose material alterations to Variation No. 2. The proposed material alterations include the removal of proposed residentially zoned lands under: MA3.1 (Finnstown), MA6.1 (St. Edmundsbury) MA11.1 (Coldcut), and MA2.1 amends the SLO attached to lands at Adamstown West to require that the DART+SW, or equivalent rail service, be operational prior to any significant residential development on the subject lands. The Planning Authority notes the concerns raised by the Office of the Planning Regulator regarding MA3.1, MA6.1, MA11.1 and MA2.1 and their potential implications for residential development capacity and housing delivery. It is also noted that the OPR fully supported the approach taken in the assessment of capacity and deliverability of existing and proposed residential zoned lands in the preparation of the Variation. The Office considered it a robust evidence-based approach used to identify the 156.5ha of additional land to provide a sufficient supply of zoned lands to meet the housing growth requirements set out in the NPF Implementation: Housing Growth Requirements. The evidence-based evaluation
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and are inconsistent with national planning policy and housing guidelines.	of lands used criteria for the assessment informed by national policy, infrastructure capacity and sustainable planning criteria to ensure that any potential rezoning would be in line with achieving the shared goals set out in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action with a focus on Transport Oriented Development. Following the assessment process, lands referenced as Amendments 1-16 were selected for rezoning under Proposed Variation No. 2 with further amendments (reference nos 22 and 23) proposed to facilitate delivery of existing and proposed zoning. Further lands were identified as suitable for strategic long-term potential (SDAs). These latter lands were not zoned but identified in the proposed Policy CS3 for the commencement of preparatory studies to inform future zoning. As such, Variation No. 2 underwent a thorough assessment process to identify lands that would meet the housing targets for the period of the Development Plan and would allow for a plan-led approach to the land use requirements of the County beyond the current Development Plan. In addition, the inclusion of SLOs on various lands provided for future development to be further informed through the application of site-specific local objectives (SLOs) and the wider Development Plan framework.
OPR Overview to Recommendation 1 – Implementation of the Housing Growth Requirements The OPR notes that the Housing Growth Guidelines require planning authorities to update development plans to accommodate increased housing demand to 2040 and ensure sufficient	OPR MA Recommendation 1 – Residential Zoning Objectives Due to the reduced residential development capacity and additional housing delivery constraints introduced by the MAs the Office is concerned at the ability of the Planning Authority to deliver homes in line with National Policy Objective 42 (NPO42) and NPO43 of the NPF First Revision (2025). NPO42 states: <i>To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.</i>

zoned land capacity to meet revised housing targets. The Office considers that the proposed material alterations (MA3.1, MA6.1 and MA11.1), which reduce residential development capacity and introduce further constraints on housing delivery, are inconsistent with NPO 42 and NPO 43 of the revised National Planning Framework which seek to increase housing supply and support sustainable development in appropriate locations. Given the robust evidence in the Settlement Capacity Audit demonstrating the need for additional residential land and flexibility to meet housing demand, these reductions could undermine the achievement of housing growth targets within the plan period. MA11.1 (Coldcut Road) The OPR does not support MA11.1 to remove Coldcut. The site is well located to support compact growth with the integration of land use and transport while retaining 7ha of open space for recreational and amenity purposes. The Office therefore remains of the view that the zoning of this land for residential	NPO43 states: <i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i> The Office notes in particular that the reduced residential capacity and additional constraints on housing delivery ‘<i>have not been supported by sufficient evidence to demonstrate that housing growth requirements can continue to be achieved within the plan period</i>’. The approach taken by the Planning Authority responded to the NPF Implementation: Housing Growth Requirements Guidelines. The annual baseline housing target set for SDCC was 3,270 units. Having regard to the annual housing targets and the assessment of deliverability on zoned lands, a shortfall of 2,086 units was identified between the period 2025-2028 to reach the baseline target of 11,699 units identified at the point in time of the assessment. Completions since that date indicate that the cumulative baseline figure remaining between Q3 2026 and Q4 2028 inclusive, based on SDCC Housing Supply Monitor completions since the assessment, has reduced to 8,205. While this confirms ongoing housing delivery, it suggests that SDCC may struggle to deliver on the housing target up to 2028, currently needing to deliver 3,282 units per annum, more than the 3,270 units set in the guidelines to meet the baseline. The rate of completions, and therefore progress towards the target, will be subject to variance within quarters and over time. This is typically the case where apartment developments constitute a significant percentage of units under construction or permitted and will be completed in bulk with some quarters or years showing high completions and others less so given the length of time to develop apartments. In this regard, 2026 has shown a high rate of completions (2,351) in the first half of the year with a ratio of 8.4:1, apartments to houses. Nonetheless, as indicated above, delivery of the baseline target will be a challenge
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development would facilitate housing growth consistent with national policy. MA6.1 (St. Edmundsbury) The OPR does not support MA6.1 to remove St. Edmundsbury. The 15ha St. Edmundsbury lands are considered to be a highly sustainable and strategically important housing opportunity in Lucan. The OPR notes that natural heritage concerns could have been addressed through the Chief Executive's recommended measures, which would have retained 9.7ha of zoned land but were not accepted. MA3.1 (Finnstown Castle) The OPR does not support MA3.1 to remove Finnstown Castle. The Finnstown Castle (18ha) lands are considered to be significant, sustainably located residential development opportunity in Lucan, whose development is critical to delivering much-needed housing close to employment, services, public transport and community facilities. MA2.1 (Adamstown SDZ West) The OPR is concerned that MA2.1 would delay significant residential	as this exceptionally high rate of delivery to date in 2026 is unlikely to be repeated in Q3 and 4. For comparison, the total annual completions in 2025 was 2,524 units. As a result, the CE recognises the need for additional provision to provide flexibility in delivery. The lands subject to the MAs were each identified as meeting the evidence-based criteria approach for zoning which informed the draft Variation. Each meets the Sustainable Residential and Compact Settlement Guidelines criteria in relation to accessibility to public transport and compact settlement, being located adjacent to existing services and facilities, which are further facilitated and added to by specific local objectives related to the sites. Having regard to the above, and to the potential deliverability of these lands in very accessible locations adjacent to existing services and facilities, it is considered that the MAs which omit the proposed zoning of residential lands should not be made. The CE responds in further detail to submissions made related to the MAs for each site in section 3.1 of this report. MA2.1 (Adamstown SDZ West) The Planning Authority also notes the OPR's concern relating to MA2.1 and the proposed change to point 1 of the SLO that the DART+SW, or an equivalent rail service, be operational before the construction of residential development. MA2.1 - '1. No significant residential development other than infrastructure necessary to facilitate the delivery of strategic transport infrastructure shall commence until DART+ Southwest, or an equivalent rail service, is operational.' The proposed Variation included the following in the SLO, point 1: CS7 SLO4 Development may not commence until Dart+ Southwest has commenced construction.
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development at Adamstown SDZ West until DART+ Southwest or an equivalent rail service becomes operational, potentially preventing housing delivery within the plan period and undermining the Planning Authority's ability to meet Housing Growth Guidelines targets.

MA Recommendation 1 - Residential Zoning Objectives

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and having considered:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and
- the NPF Implementation: Housing Growth Requirements (2025), the Office recommends that the Planning Authority makes the proposed Variation without the following:

The key change in the MA wording of the SLO from the Variation is that no residential development shall commence until DART+SW is **operational**.

The Chief Executive considers that this MA will introduce an unnecessary and unreasonable delay to the delivery of housing. This is in the context of the existing rail and bus services which, while improvements are necessary, would suffice in the interim on the clear basis that **construction** of DART+SW has commenced. The recommendation of the Chief Executive is not to make the MA and to revert to the wording that was published at the draft stage, which would permit development to commence once DART+SW has commenced construction.

Conclusion on OPR MA Recommendation 1

It is noted that the NPF Implementation Guidelines (2025) request local authorities to reflect additional provision of land of up to 50% over and above that required to meet the baseline requirements set out in Appendix 1 of the guidelines. Policy and Objective 2 of the Guidelines state the following:

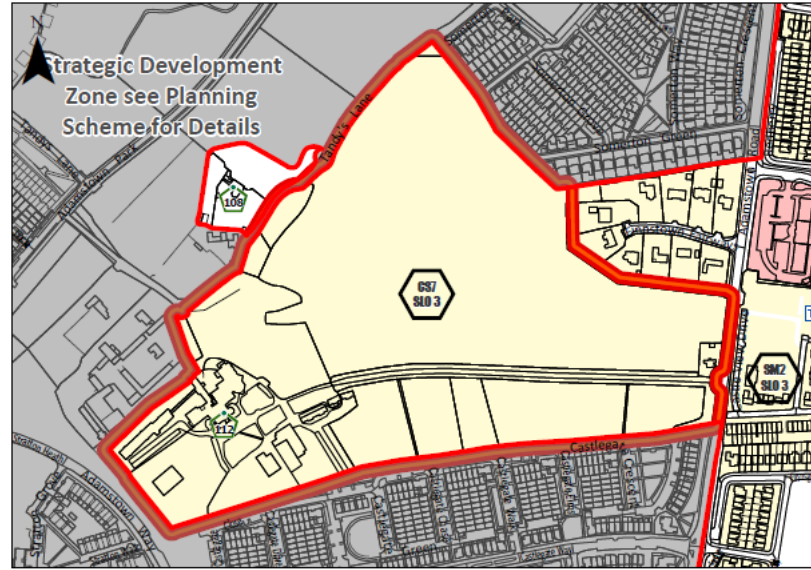
'It is a policy and objective of these Guidelines that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan'

In response to this, the draft Variation provided for additional provision of approximately 45%.

The reduction in housing delivery capacity generated by the material alterations for Finnstown MA3.1; St. Edmundsbury MA6.1 and Coldcut MA11.1 would reduce the additional provision to approximately 28%.

Taking further account of MA2.1 and the condition imposed by the requirement for DART+SW to be operational before residential development commences has the

(i) MA 3.1; (ii) MA 6.1; (iii) MA11.1; and (iv) MA 2.1.	impact of further reducing the additional provision available within the period of the CDP to approximately 20%. It is noted that the OPR is of the view that in the absence of a clear assessment showing how the proposed changes support or at least do not undermine the delivery of the updated housing targets, the proposed material alterations are inconsistent with NPO 42 and NPO 43 of the NPF and do not take due account of the Housing Growth Guidelines. Having regard to the significant reduction in the additional provision and the associated reduction in flexibility to achieve the baseline targets, on lands which meet sustainable planning criteria including transport-oriented development, the Chief Executive is of the view that cumulatively the identified material alterations may undermine delivery of the housing targets and should not be made. CE Recommendation on the OPR MA Recommendation 1 CE Recommendation: Finnstown Castle MA3.1 To make the Variation without MA3.1 and that the lands at Finnstown Castle are zoned as originally proposed in Variation No. 2 of the County Development Plan (2022-2028) under Amendment Ref. No. 3 with the associated SLO as follows: <i>Finnstown Castle - Amendment Ref. No. 3</i>
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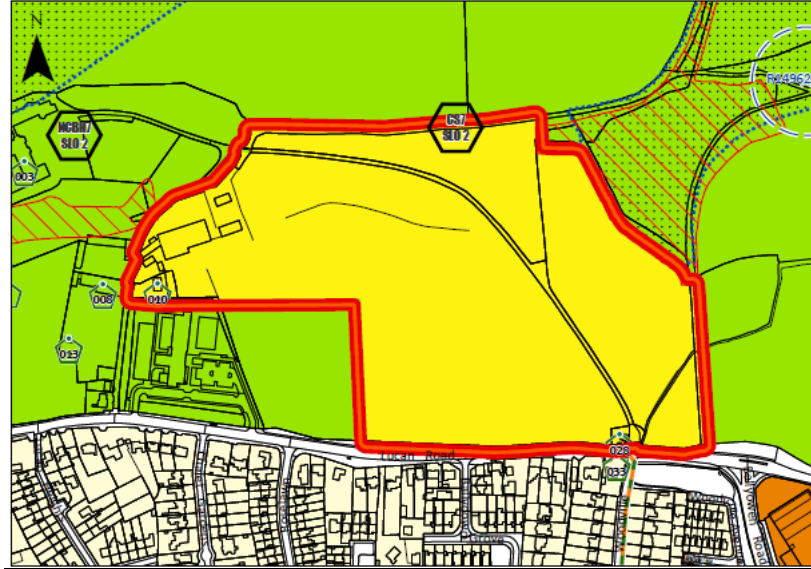


CS7 SLO3:

Development on RES zoned lands at Finnstown Castle shall comply with the following:

1. Development may not commence until Dart+ Southwest has commenced construction.
2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.
3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia:

	a. Retention and enhancement of the hedgerow and tree line on the northwestern boundary of the site as recorded on 1st Edition OS maps, b. A Social Infrastructure Audit and provision within development proposals to address any needs identified, c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, d. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage, e. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and f. Provision for direct active travel connections from the subject lands into Adamstown SDZ. CE Recommendation: St. Edmundsbury MA6.1 To make the Variation without MA6.1, and that the lands at St. Edmundsbury are zoned as originally proposed in Variation No. 2 of the County Development Plan (2022-2028) under Amendment Ref. No. 6 with the associated SLO as follows: <i>St Edmundsbury - Amendment Ref. No. 6</i>
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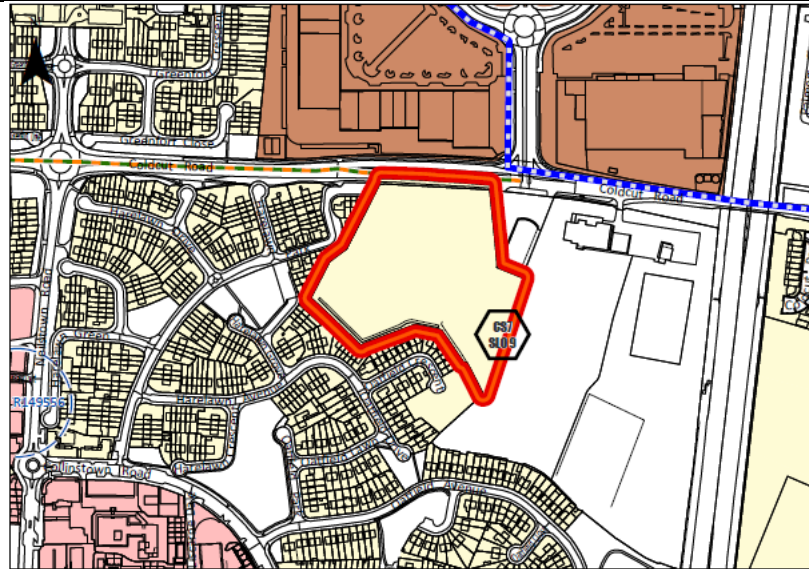


CS7 SLO2:

Development on RES-N zoned lands at St. Edmundsbury, Lucan Road shall comply with the following:

1. The development of a park within the Liffey Valley (zoning objective HA-LV) with enhanced recreational amenity and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network shall be provided for in tandem with, or prior to, residential development of the adjoining Res-N zoned lands. The park shall include lands within the HA-LV zoning objective to the north and west of the Res-N zoned lands extending to the River Liffey, including to the north and west of St. Patrick's Hospital grounds, and including connections westwards to Lucan Village and Chapel Hill. A detailed proposal to achieve this shall be agreed with the planning authority in advance of submission of a planning application for residential development on the Res-N zoned lands.
2. A masterplan for the lands shall be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the

	submission of a planning application for residential development informed by and addressing, inter alia: a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, b. Retention and enhancement of the east-west hedgerow and tree line in the north of the site as recorded on 1st Edition OS maps, c. A Local landscape and historical character assessment, d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and e. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structures and their curtilage. CE Recommendation: Coldcut Road MA11.1 To make the Variation without MA11.1, and that the lands at Coldcut Road are zoned as originally proposed in Variation No. 2 of the County Development Plan (2022-2028) under Amendment Ref. No. 11 with the associated SLO as follows: <i>Coldcut Road - Amendment Ref. No. 11</i>
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CS7 SLO9:

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

CE Recommendation: MA 2.1 Adamstown SDZ West, point 1 of CS7 SLO4

To make the Variation **without** MA2.1 point 1 so that it reads as follows:

1. Development may not commence until Dart+ Southwest has commenced construction.

And

	CE Recommendation: Adamstown SDZ West, point 3f of CS7 SLO4 To make the Variation with MA2.1 point 3f as follows: 3 f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth. For clarity, subject to approval of the above CE Recommendations, CS7 SLO4 for amendment no.2, Adamstown SDZ West, will read: CS7 SLO4: Development on RES-N zoned lands to the west of Adamstown SDZ shall comply with the following: 1.Development may not commence until Dart+ Southwest has commenced construction 2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. 3. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: a. Retention and enhancement of the east-west hedgerow in the northern part of the site as recorded on 1st Edition OS maps, unless required for wider movement
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	needs, interventions in or adjacent to the woodland should be informed by EclA and SDCC will support the maintenance of such habitat as a refuge for wildlife, b. A Social Infrastructure Audit and provision within development proposals to address any needs identified, c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, d. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and e. Provision for future infrastructure and access connections to lands to the south and west, including reservation for a future vehicular bridge over the railway line, unless determined otherwise in writing by the planning authority; and f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth.
OPR Overview of MA Recommendation 2 – Restrictions on Bulk Purchases The OPR considers that proposed blanket restrictions on bulk purchases of residential units would extend beyond the mechanisms provided for under the <i>Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities</i> (2021). The current guidelines provide for such controls through planning conditions and agreements at the development management stage and the introduction of the SLO could unduly constrain the delivery of apartments. These amendments therefore introduce a	OPR MA Recommendation 2 – Restrictions on Bulk Purchases The Planning Authority notes the OPR’s recommendation on the proposed inclusion of an SLO on bulk purchases across the proposed Variation sites. The OPR considers the proposed blanket restrictions on bulk purchases of residential units extends beyond the scope of the relevant <i>Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities</i> (2021) and introduces a further constraint on the Planning Authority’s capacity to deliver housing consistent with the NPF and Housing Growth Guidelines, whilst unduly constraining the delivery of apartments. The <i>Regulation of Commercial Institutional Investment in Housing Guidelines for Planning Authorities</i> (May 2021 Section 28 of the Planning and Development Act 2000, updated in July 2023) was published by the Department of Housing, Local Government and Heritage in response to commercial institutional investors bulk-purchasing houses and duplex units. The Circular to the amended Guidelines NRUP 01/2023 indicated that apartments continue to be excluded from the requirements set out within the Guidelines.

further constraint on the Planning Authority's capacity to deliver housing consistent with the NPF and Housing Growth Guidelines. In this regard the OPR has made the following recommendation:

MA Recommendation 2 - Restrictions on bulk purchases

Having regard to the delivery of housing, and having considered:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- the NPF Implementation: Housing Growth Requirements (2025); and
- the Regulation of Commercial Institutional Investment in Housing -Guidelines for Planning Authorities (2021),

The guidelines set out planning conditions that may be tailored to address the issue of bulk purchase by commercial institutional investment subject to the nature of the planning application, to which planning authorities and An Coimisiún Pleanála must have regard.

The current proposed wording for the SLO in the relevant MAs refers to 'residential units', implying that all residential properties including apartments are included. The guidelines published by the Department of Housing, Local Government and Heritage specifically applies to houses and duplex. As such, apartments are excluded from these guidelines as a measure to support investment in delivery of high density apartment developments and to ensure these development types remain viable.

The inclusion of the proposed SLO on lands within South Dublin will significantly impact the ability of the Council to achieve the targets set out in the NPF and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities*. As outlined above in response to the OPRs Recommendation 1, apartments comprise a critical element in meeting housing delivery and completions in the County. The proposed MAs will also negatively impact on the ability of the planning authority to meet the appropriate densities set out under the *Sustainable Residential and Compact Settlement Guidelines* in addition to being contrary to the clear intent and focus of the *Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities* (2021, as amended). These latter guidelines already provide an appropriate mechanism, through the inclusion of planning conditions for houses and duplex, to ensure that individuals are not shut out of the housing market by bulk buying by corporate entities.

Having regard to the above, the MAs relating to bulk purchasing are not supported by the CE, given that the appropriate national guidelines which set out templates

the Office recommends that the Planning Authority makes the proposed Variation without the following: (i) MA 1.2; (ii) MA 2.2; (iii) MA 4.2; (iv) MA 5.2; (v) MA 7.3; (vi) MA 8.1; (vii) MA 9.2; (viii) MA10.1; (ix) MA 12.1; (x) MA 13.1; (xi) MA 14.2; and (xii) MA 15.1.	for relevant planning conditions, and which are implemented by SDCC at the local level, are in place to manage any potential bulk-buying of houses and duplex. CE Recommendation on OPR MA Recommendation 2 That the Variation is made without the following Material Alterations relating to bulk purchases: MA1.2 (Ballynakelly); MA2.2 (Adamstown SDZ West); MA4.2 (Tubber Lane North); MA5.2 (Citywest); MA7.3 (Edmondstown Road); MA8.1 (Kiltipper Road); MA9.2 (Knockmeenagh Framework Site); MA10.1 (Stonewall); MA12.1 (Cherryfield); MA13.1 (Rathcoole); MA14.2 (Foxhunter); and MA15.1 (Ninth Lock Road).
MA Observation 1 - Appropriate Assessment The OPR notes that the Screening for SEA and AA Report does not clearly determine whether MA65.1 and MA66.1 have the potential to result in likely significant effects on European Sites. In relation to these material alterations, the OPR advises the Planning Authority ‘to clearly state the conclusion in relation to potential effects on European Sites in the Screening for SEA and AA Report’.	OPR MA Observation 1 - Appropriate Assessment The OPRs observation is noted in relation to the SEA and AA screening assessments for MA65.1 and MA66.1 and the need for greater clarity in relation to potential effects on European Sites. The Planning Authority notes that OPR Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation. The Planning Authority recognises that the wording relating to the AA assessment of MA65.1 in the Screening for SEA and AA Report of the lands at Cornerpark (Haughan's Field) and Elmcastle is not sufficiently clear.

MA Observation 1 - Appropriate Assessment

Having regard to the need to ensure all plans and projects are appropriately assessed for significant effects on the environment, and having considered:

- article 6(3) of the Habitats Directive to ensure any plan or project likely to have a significant effect on a Natura 2000 site undergoes an appropriate assessment; and
- NPO 1 of the NPF to ensure all plans and projects are subject to the relevant environmental assessment requirements including Strategic Environmental Assessment (SEA), Environmental Impact Assessment, Strategic Flood Risk Assessment and Appropriate Assessment (AA) as appropriate,

the Planning Authority is advised to clearly state the conclusion in relation to potential effects on European Sites in the Screening for SEA and AA Report for the following:

On foot of the OPRs Observation, the Chief Executive discussed the wording in the SEA and AA report with the environmental consultants. It was agreed by the consultant that the wording could be made more clear. The Chief Executive wishes to clarify that the mitigation measures and safeguards contained within the NIR are considered sufficient at plan level, while any future development proposal would be required to demonstrate compliance with those measures at project level. Accordingly, the Chief Executive recommends revising the current AA wording under MA65.1 and MA66.1 in the Screening for SEA and AA Report for the Proposed Material Alterations to ensure that the intent of the wording is made clearer.

CE Recommendations on OPR MA Observation 1

To amend the AA wording under MA65.1 in the Screening for SEA and AA Report for the proposed Material Alteration at Cornerpark, Newcastle (Haughan's Field):

From

Given the presence of hydrological pathway, the potential for likely significant effects would not be ruled out at the screening stage and these proposed amendments would need to be subject to appropriate assessment and consideration as part of the Natura Impact Report (NIR) of the proposed Variation. It is noted that the NIR of the proposed Variation identified conceivable impacts arising from land use activities associated with future residential development. The NIR has set out all necessary safeguards to ensure that the implementation of the proposed Variation, and the land use activities arising from it, will not result in adverse effects in European Sites. These lands would require further investigation to ensure the safeguards that are set out in the existing NIR will provide appropriate protection to European Sites from any land use activities that may arise from future residential development at this location.

To

(i) MA 65.1; and (ii) MA 66.1	M65.1 Cornerpark: The lands at Cornerpark are representative of improved agricultural grassland with hedgerow field boundaries. No watercourses as mapped by the EPA occur within or bounding the Cornerpark site. The nearest watercourse, as mapped by the EPA, is located approximately 450m to the southeast of the site. The Cornerpark Site is located within the River Liffey surface water catchment area. Future surface water and wastewater infrastructure, provided as part of any future residential development project at this site, will presumably drain surface water and wastewater respectively to the receiving watercourses discharging to the River Liffey and to the municipal wastewater treatment plant at Ringsend. As such, any conceivable surface water pathway to European Sites at Dublin Bay arising from the Cornerpark Site will be the same as that examined in Section 7.2 of the NIR. Section 7.2 of the NIR notes that the surface water pathway connecting the Plan Area, as well as the now included Cornerpark Site, to Dublin Bay will represent a tenuous impact pathway and is unlikely to function as a vector for contaminants with potential to result in perceptible impacts to water quality and European Sites at Dublin Bay. Any conceivable wastewater pathway to European Sites at Dublin Bay arising from the Plan Area, as well as the now included Cornerpark Site, will be the same as that examined in Section 7.2.1 of the NIR. Section 7.2.1 of the NIR found that the discharge of wastewater generated by future development facilitated by the Plan to the Ringsend wastewater treatment plant will not have the potential to function as an impact pathway and result in adverse effects to the conservation objectives of the Dublin Bay European Sites. In view of the above it can be concluded that the inclusion of the Cornerpark Site does not trigger any additional potential impacts, over and above those already considered as part of the NIR.
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	It is further noted in the NIR, that notwithstanding the tenuous impact pathway connecting Proposed Variation Lands, including the Cornerpark Site, to European Sites, mitigation measures are set out in Section 8 of the NIR and the implementation of these mitigation measures will provide protection for European Sites occurring downstream of the Plan Area (including downstream of the Cornerpark Site). Given that the inclusion of Cornerpark Site does not trigger any additional effects, over and above those already considered as part of the NIR, that all mitigation measures set out in the NIR will be applicable to the Cornerpark Site, as well as all other Proposed Variation Lands, it is concluded that the examination of impacts and mitigation measures set out in the NIR are entirely applicable to the Cornerpark Site and no further consideration of impact or new mitigation measures are required to ensure that inclusion of the Cornerpark Site does not trigger impacts to European Sites. AND To amend the AA wording under MA66.1 in the Screening for SEA and AA Report for the proposed Material Alteration at Elmcastle: <i>From</i> <i>Whilst the footprint is very small and this site is well set back from any watercourses, the only connection between this site and Dublin Bay European Sites is likely to be surface water drainage infrastructure as well as wastewater discharges which are ultimately expected to be discharged to the Ringsend WWTP. Given the small footprint of this site, the volume of surface water discharging from same, in the context of the overall receiving River Liffey catchment will be miniscule. In addition, the volume of wastewater loading generating by any future housing on these lands, is also expected to be miniscule. As such, the surface water and wastewater emissions generated by future housing</i>
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on this land, is expected to be de-minimus and will not have the potential to result in likely significant effects, alone or in combination, with other plans and projects to European Sites. Notwithstanding the consideration set out above, in the event the plot is brought forward to residential zoning, the lands, as with all such lands proposed, would be required to be brought forward to screening for AA as part of the Variation.

To

M66.1 Elmcastle Court: The lands at Elmcastle Court are representative of amenity grassland. No watercourses as mapped by the EPA occur within or bounding the Elmcastle Court. The nearest watercourse, as mapped by the EPA, is located approximately 650m to the southeast of the site.

The Elmcastle Court Site is located within the River Liffey surface water catchment area. Future surface water and wastewater infrastructure, provided as part of any future residential development project at this site, will presumably drain surface water and wastewater respectively to the receiving watercourses discharging to the River Liffey and to the municipal wastewater treatment plant at Ringsend.

As such any conceivable surface water pathway to European Sites at Dublin Bay arising from the Elmcastle Court Site will be the same as that examined in Section 7.2 of the NIR. Section 7.2 of the NIR notes that the surface water pathway connecting the Plan Area, as well as the now included Elmcastle Court Site, to Dublin Bay will represent a tenuous impact pathway and is unlikely to function as a vector for contaminants with potential to result in perceptible impacts to water quality and European Sites at Dublin Bay.

Any conceivable wastewater pathway to European Sites at Dublin Bay arising from the Plan Area, as well as the now included Elmcastle Court Site, will be the same as that examined in Section 7.2.1 of the NIR. Section 7.2.1 of the NIR found that

	the discharge of wastewater generated by future development facilitated by the Plan to the Ringsend wastewater treatment plant will not have the potential to function as an impact pathway and result in adverse effects to the conservation objectives of the Dublin Bay European Sites. In view of the above it can be concluded that the inclusion of the Elmcastle Court Site does not trigger any additional potential impacts, over and above those already considered as part of the NIR. It is further noted in the NIR, that notwithstanding the tenuous impact pathway connecting Proposed Variation Lands, including the Elmcastle Court Site, to European Sites, mitigation measures are set out in Section 8 of the NIR and the implementation of these mitigation measures will provide protection for European Sites occurring downstream of the Plan Area (including downstream of the Elmcastle Court Site). Given that the inclusion of Elmcastle Court Site does not trigger any additional effects, over and above those already considered as part of the NIR, that all mitigation measures set out in the NIR will be applicable to the Elmcastle Court Site, as well as all other Proposed Variation Lands, it is concluded that the examination of impacts and mitigation measures set out in the NIR are entirely applicable to the from the Plan Area, which includes the Elmcastle Court Site, and no further consideration of impact or new mitigation measures are required to ensure that inclusion of the Elmcastle Court Site does not trigger impacts to European Sites.
Summary In summary, the OPR requests that the Planning Authority addresses the recommendations and observations set out in their submission.	Conclusion to Recommendations and Observation As set out above, a robust land capacity assessment was undertaken by the Planning Authority which identified lands to meet the shortfall from the revised targets, and which included additional lands to provide up to the requested level of flexibility to deliver on the targets. The reduction in lands as a consequence of the proposed Material Alterations through the omission of lands and through the

The OPR indicates that following adoption of the Variation the Planning Authority is required to inform the Office, as soon as practicable, where it decides not to comply with a recommendation, including the reasons for this decision.	constraints introduced by way of SLOs, is considered to undermine the potential to deliver the housing targets. The lands affected by MA3.1, MA6.1, MA11.1 and MA2.1 were identified through an evidence-based assessment process having regard not only to housing need but also to compact growth, accessibility, transport-oriented development and sustainable planning principles. The requirement to inform the OPR of non-compliance with a recommendation is noted. With regard to the observation on the AA for the lands proposed for inclusion in the Material Alterations, that is MA65.1 and MA66.1, the OPRs comments are acknowledged, and a clarification of the wording is put forward in the CE Recommendation.
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2.3 Overview of the Submission Made by the National Transport Authority (NTA) and Chief Executive's Response and Recommendations - [SD-C431-161 National Transport Authority](#)

NTA Summary	CE Response and Recommendation
The NTA indicates that the Greater Dublin Area Transport Strategy 2022-2042 (GDATS) is the relevant transport strategy for the purpose of section 48(8) of the Planning and Development Act 2024 and the requirement that a planning authority takes due account of any relevant transport strategy of the NTA. The GDATS provides the strategic framework for the integrated development of transport infrastructure and services within the Greater Dublin Area and serves as the relevant transport strategy for South Dublin. The NTA state that they reiterate their observations from the previous stage that the development of sites with high levels of accessibility to existing transport services, particularly where they consolidate or adjoin the existing built-up area of Metropolitan Dublin, should not be constrained. Otherwise, this may undermine the integration of transport and land use planning.	The statutory role of the NTA under Section 42 of the Planning and Development Act 2024 and the requirement for Development Plans to take due account of the Greater Dublin Area Transport Strategy 2022-2042 (GDATS) is acknowledged. In preparing the proposed Variation the Planning Authority has taken account of the Strategy. Criteria for transport accessibility, based on distances set out in the Sustainable Residential Development and Compact Settlement section 28 guidelines, was included in the assessment of lands as part of an evidence-based approach to the proposed Variation. The Planning Authority agrees with the NTA on the need for compact growth with a focus on Transport Orientated Development (TOD). Both were key considerations for the proposed Variation No. 2. This is a key objective of the South Dublin County Development Plan 2022-2028, recognising the benefits it can bring to citizens through connected neighbourhoods and the greater facilitation of access to services in line with the 10-minute settlement concept and its role in promoting improved efficiencies from existing and planned infrastructure.

The NTA emphasises that consideration should be given to the existing rail network, the extensive bus network within the County, and the proximity of other services and trip attractors when determining the priority afforded to each site in this Variation.	
MA3.1 (Finnstown Castle) The NTA recommends that, in meeting the Council's requirement to zone additional lands for housing, MA3.1 is not made. They have stated that the site should be zoned for residential use as originally proposed, but without condition. The site is already well served by public transport, with the C1, L53 and P29 bus routes providing 14 peak-hour services, including 12 to Dublin City Centre and 2 to Liffey Valley. It also benefits from proximity to Adamstown Station, which offers four AM peak-hour rail services to the city centre. Subject to improved pedestrian connectivity, the C2 route could also be within walking distance. Overall, the lands achieve a medium-high level of accessibility according to the NTA's Public Transport Accessibility Level (PTAL) assessment.	The Planning Authority notes the NTA's support for the inclusion of the Finnstown Castle lands as part of the Variation process. The NTA highlighted that the site benefits from a strong existing and planned public transport network, including high-frequency bus services, proximity to Adamstown Station and existing rail services with future improvements through DART+ South West. The NTA considered the lands to be well suited for residential development, consistent with the principles of Transport Orientated Development (TOD) and compact growth. The Planning Authority underwent a thorough assessment process (Settlement Capacity Audit) and selected this site for rezoning. The Planning Authority considers that the identification of Finnstown Castle is consistent with a plan-led approach to sustainable urban development, promoting compact growth, within an established and emerging urban structure. Rather than representing uncontrolled expansion, the zoning reflects the principles of consolidation and sequential development, supporting growth contiguous to existing serviced lands and planned infrastructure utilising TOD principles. The Chief Executive's recommendation at draft Variation stage was to retain the proposed residential zoning of these lands, subject to amendments to the associated SLO. Following the Special Council meetings on the 19th and 24th June 2026, the Elected Members of South Dublin County Council resolved to propose the following Material Alteration in relation to the site:

MA3.1 - To omit Amendment Ref. No. 3 – Finnstown Castle.

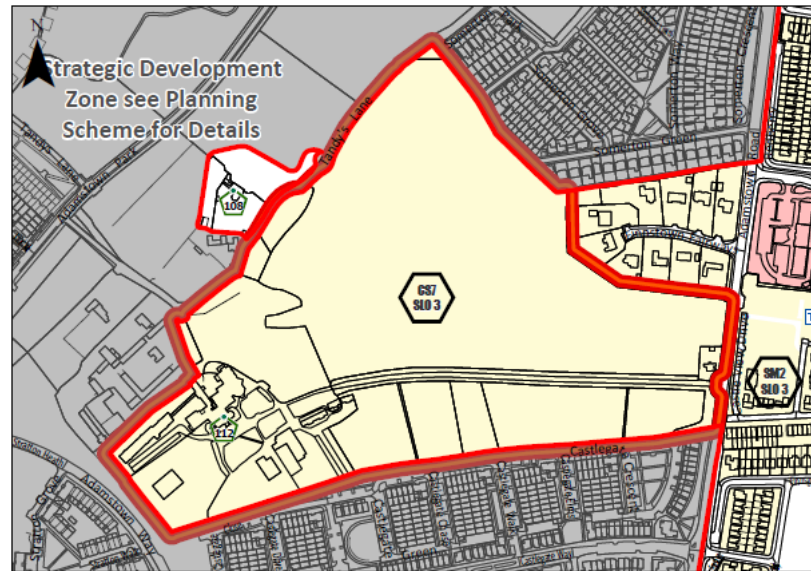
The Chief Executive recommends that MA3.1 is not made and that the lands at Finnstown Castle are zoned as originally proposed in the Variation, having regard to the strategic location of the lands based on their contribution to compact growth and accessibility to public transport, their potential for delivery and their alignment with national policy (see also response to submissions on MA3.1 in Section 3 of this CE Report).

CE Recommendation - Finnstown Castle

That the proposed Variation is made **without** MA3.1 as follows:

Finnstown Castle - Amendment Ref. No. 3

To zone from OS to RES with the associated SLO:



CS7 SLO3:

	Development on RES zoned lands at Finnstown Castle shall comply with the following: 1. Development may not commence until Dart+ Southwest has commenced construction. 2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. 3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia: a. Retention and enhancement of the hedgerow and tree line on the northwestern boundary of the site as recorded on 1st Edition OS maps, b. A Social Infrastructure Audit and provision within development proposals to address any needs identified, c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, d. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage, e. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and f. Provision for direct active travel connections from the subject lands into Adamstown SDZ.
MA6.1 (St. Edmundsbury) The NTA recommends that, in meeting the Council's requirement to zone additional lands for housing, MA6.1 is	The Planning Authority notes the NTA's submission in relation to MA6.1 and its recommendation that the St. Edmundsbury lands should be retained for residential development. The NTA considers the site well served by a variety of

not made and St. Edmundsbury is prioritised. The NTA considers St. Edmundsbury to be a highly suitable location for residential development due to its strong accessibility by existing radial and orbital public transport services. The NTA notes that rezoning the site for housing would support the sustainable delivery of much-needed residential lands in South Dublin County by consolidating development within the existing built-up area and making efficient use of existing and planned public transport infrastructure.	radial and orbital services and represents an opportunity to consolidate development within the existing built-up area of Lucan. The Planning Authority underwent a thorough assessment process (Settlement Capacity Audit) to identify the most appropriate lands for rezoning, having regard to Transport Orientated Development and compact development. It is noted that a number of submissions have been raised regarding traffic and transport concerns in the Lucan area and these are responded to in Section 3 of this report. As noted by the NTA, the lands at St. Edmundsbury are served by a variety of radial and orbital services and are therefore accessible by public transport. They are also located within a wider area that is served and will be significantly enhanced by strategic public transport investment, including: • BusConnects Core Bus Corridors (Lucan and Liffey Valley); • DART+ South West, for which a Railway Order was approved in November 2024 and which remains a key national infrastructure project; • the future Luas Lucan scheme; and • wider investment under the Greater Dublin Area Transport Strategy 2022–2042. The Planning Authority strongly supports the delivery of these projects and recognises their transformative role in supporting sustainable mobility, reducing car dependency and enabling compact growth. It is noted that the Chief Executive's recommendation at draft Variation stage was to retain the proposed residential zoning of these lands, subject to amendments to the associated SLO and a reduction in the site boundary to 9.7ha. Following the Special Council meetings on the 19th and 24th June 2026, the Elected Members of South Dublin County Council resolved the following Material Alteration in relation to the site:
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MA6.1 - *To omit Amendment Ref. No. 6 – St. Edmundsbury.*

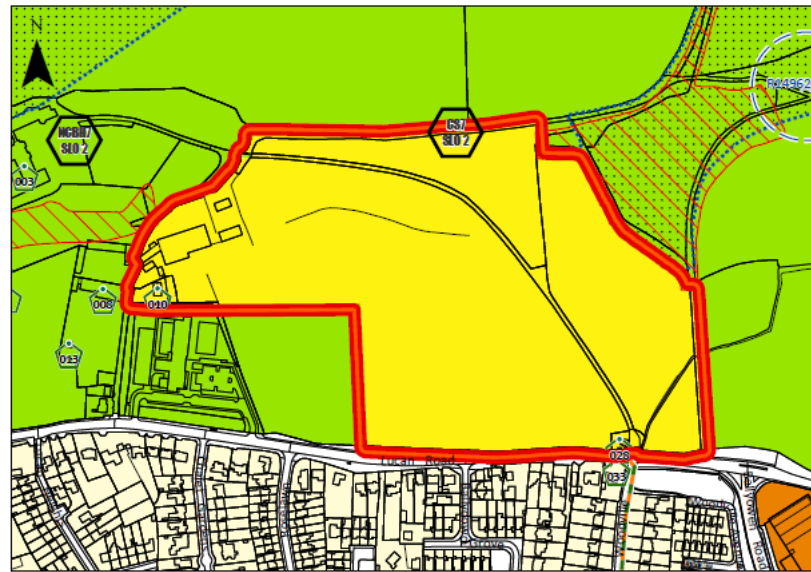
The Chief Executive notes the NTA's concerns regarding the loss of a sustainable and accessible residential development opportunity and is also of the view that MA6.1 St. Edmundsbury should not be made and the lands zoned as originally proposed. The recommendation is made having regard to the strategic location of the lands based on their contribution to compact growth and accessibility to public transport and services, their potential for delivery and their alignment with national policy (see also response to further submissions to MA6.1 in Section 3 of this CE Report).

CE Recommendation - St. Edmundsbury

That the proposed Variation is made **without** MA6.1 as follows:

St Edmundsbury - Amendment Ref. No. 6

To zone from HA-LV to RES-N with the associated SLO:



	CS7 SLO2: Development on RES-N zoned lands at St. Edmundsbury, Lucan Road shall comply with the following: 1. The development of a park within the Liffey Valley (zoning objective HA-LV) with enhanced recreational amenity and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network shall be provided for in tandem with, or prior to, residential development of the adjoining Res-N zoned lands. The park shall include lands within the HA-LV zoning objective to the north and west of the Res-N zoned lands extending to the River Liffey, including to the north and west of St. Patrick's Hospital grounds, and including connections westwards to Lucan Village and Chapel Hill. A detailed proposal to achieve this shall be agreed with the planning authority in advance of submission of a planning application for residential development on the Res-N zoned lands. 2. A masterplan for the lands shall be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia: a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, b. Retention and enhancement of the east-west hedgerow and tree line in the north of the site as recorded on 1st Edition OS maps, c. A Local landscape and historical character assessment, d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and e. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structures and their curtilage.
MA11.1 (Coldcut Road) The NTA recommends that, in meeting the Council's requirement to zone additional lands for housing, MA11.1 is	The Planning Authority notes the NTA's submission in relation to MA11.1 and its recommendation that the Coldcut Road lands should be retained for residential development. The NTA considers the site well served by a variety of radial and

not made and Coldcut should be prioritised to support demand in as sustainable a manner as possible. The site is served by a variety of radial and orbital services and is therefore accessible by public transport. The development of the site would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services.	orbital services and represents an opportunity to consolidate development within the existing built-up area. The Planning Authority notes the NTA's concerns regarding the loss of a sustainable and accessible residential development opportunity. The Planning Authority underwent a thorough assessment process (Settlement Capacity Audit) and selected this site for rezoning. The proposed lands for rezoning form part of a wider area currently zoned Open Space (OS) which was used by Dublin Bus Services Sports and Social Club. The proposed lands comprise approximately 3 hectares within the overall 10 hectares of Open Space zoning located south of the Coldcut Road (R833) and the Liffey Valley Shopping Centre. The lands subject to the rezoning are currently unused and overgrown. The lands are located in a highly accessible location adjacent to Liffey Valley retail and leisure facilities, in addition to a number of other amenity and local services within the immediate area. It is served by radial and orbital public transport services and will benefit from investment in the Lucan and Liffey Valley Core Bus Corridor schemes. It is noted that the Chief Executive's recommendation at draft Variation stage was to retain the proposed residential zoning of these lands, subject to amendments to the associated SLO. Following the Special Council meetings on the 19th and 24th June 2026, the Elected Members of South Dublin County Council resolved the following Material Alteration in relation to the site: MA11.1 - <i>'To omit Amendment Ref. No. 11 - Coldcut.</i> The Chief Executive is of the view that the lands at Coldcut Road should be zoned and MA11.1 should not be made. The rezoning of the approximate 3 hectares of OS to RES as proposed in the draft Variation would still ensure that the remaining approximately 7 hectares of zoned Open Space will remain. Furthermore, the
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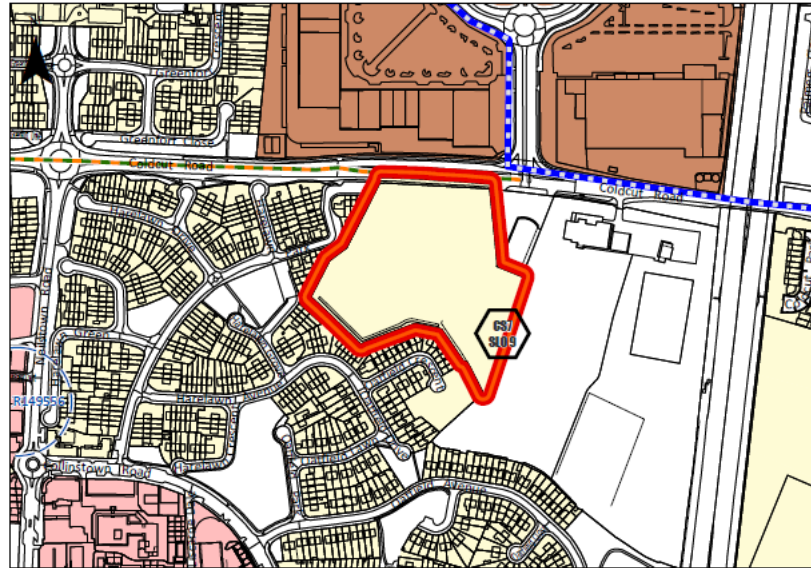
remaining open space, through the originally proposed SLO, would have the potential to come into public use, a use not currently facilitated on these privately owned lands, notwithstanding the zoning (see also response to submissions on MA11.1 in Section 3 of this CE Report).

CE Recommendation – Coldcut Road

That the proposed Variation is made **without** MA11.1 as follows:

Coldcut Road - Amendment Ref. No. 11

To zone from OS to RES with the associated SLO:



CS7 SLO9:

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

MA2.1 (Adamstown SDZ West) and MA4.1 (Tubber Lane North) The NTA have expressed concern regarding the inclusion of the phrase ‘or equivalent rail service is operational’ as part of the SLOs of Adamstown SDZ West and Tubber Lane North. The NTA have also reiterated their position from the first stage of the Variation that the condition, as originally worded, could unnecessarily constrain housing delivery in one of the County’s most accessible and sustainable locations, effectively prioritising growth in less accessible locations than Adamstown West. They state that a direct linkage between the development of the Tubber Lane lands and DART+ South West is not necessary, given the site's location and accessibility characteristics, and therefore considers that the condition should be removed in its entirety. The NTA notes that DART+ SW is intended to significantly increase rail capacity over time and the increased level of service may be introduced on a phased basis. The meaning of “equivalent rail service” and its consequences for meeting the housing targets is considered to be unclear. Notwithstanding their position	The Planning Authority notes the NTA's concerns regarding the inclusion of the phrase ‘or equivalent rail service is operational’ within the SLO’s relating to Adamstown SDZ West and Tubber Lane North and their observation, reiterated in this submission, that it may not be in the best interest of maximising transport and land use integration to constrain the development of sites which have good accessibility to transport and existing services, such as Adamstown SDZ West and Tubber Lane North. The proposed Variation for both sites included the following in the SLOs, point 1 in each: CS7 SLO4 and CS7 SLO5: Development may not commence until Dart+ Southwest has commenced construction. The Chief Executive’s Report at the draft stage, further amended in the response and recommendations to motions, put forward the following amendment to the wording of the proposed Variation, point 1 of CS7 SLO4 (Adamstown SDZ West) and point 1 of CS7 SLO5 (Tubber Lane North), changes in bold: ‘1. Development may not commence until Dart+ Southwest has commenced construction or an equivalent rail service to the Dart+SW is operational, as may be relevant.’ The intention of the CE amended wording, which added in reference to ‘an equivalent rail service ... is operational’ was to ensure that residential development remained aligned with sustainable transport investment while providing additional flexibility. This was in the event that alternative rail improvements to Dart+SW, such as any potential for battery trains which could require less infrastructural investment, came forward in advance of Dart+SW. It should be noted that the SLO as recommended by the CE retained the original wording for DART+SW – that
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on constraints being placed on development by the inclusion of ‘or equivalent rail service’, the NTA have indicated their willingness to assist in defining what would constitute an equivalent rail service to ensure that these sites, Adamstown West in particular, can be brought forward in a phased manner in advance of more peripheral sites.	development (on the Variation lands) may not commence until Dart+ Southwest has commenced construction. At the Special Council meetings on the 19th and 24th June 2026, the Elected Members of South Dublin County resolved to change the wording of the proposed Variation and the CE Recommendation for Adamstown SDZ West. The Members agreed to the CE Recommendation for the wording of the SLO on the Tubber Lane North lands, point 1. These are addressed in further detail below: Adamstown SDZ West (MA2.1) The following Material Alteration point 1 change to CS7 SLO4 was resolved by Members and put out for public consultation: <i>MA2.1 - ‘1. No significant residential development other than infrastructure necessary to facilitate the delivery of strategic transport infrastructure shall commence until DART+ Southwest, or an equivalent rail service, is operational.’</i> The key change in the wording of the SLO from that recommended by the CE, aside from the ‘equivalent rail service’ is that no residential development shall commence until DART+SW is operational. As outlined above, the original intention of ‘an equivalent rail service is operational’ was to accommodate any potential for the quicker delivery of an equivalent rail service to Dart+SW, such as battery trains. However, the key concern to the Chief Executive in the change of wording proposed by Members in the MA is the linking of delivery of residential development on the lands with the commencement of operation of DART+SW
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	rather than the originally worded ‘with the commencement of construction’. It is considered that the material alteration wording (MA2.1), requiring DART+ SW service to be operational before residential development commences, will introduce an unnecessary and unreasonable delay to the delivery of housing. This is in the context of the existing rail and bus services which, while improvements are necessary, would suffice in the interim on the clear basis that construction of DART+SW has commenced. The recommendation of the Chief Executive is to revert to the wording that was published at the draft stage, which would permit development to commence once DART+SW has commenced construction, noting that the inclusion of an alternative service was not part of the draft Variation wording. The proposed Variation original wording: ‘1. Development may not commence until Dart+ Southwest has commenced construction.’ In terms of the NTA concerns around ‘or equivalent rail service is operational’, the reversion to the Variation wording will ensure that the wording is omitted in its entirety. The NTA’s reiteration of their observations that sites with accessibility to existing services, including transport, is relatively high and it may not be in the best interest of maximising transport and land use integration to constrain the development of such sites is noted. The CE considers that linking development to the commencement of construction of DART+ SW, provides an appropriate and reasonable mechanism to coordinate the phased delivery of housing and strategic transport infrastructure. This approach has regard to the cumulative impact of housing delivery in the surrounding area and the need to make every effort to encourage a behavioural change and reduction in private transport use – Avoid – Shift – Improve approach - to ensure that sufficient capacity remains on the existing road infrastructure for public transport and for those with less choice in their transport options. The inclusion of the original SLO supports the timely delivery of housing while ensuring that future growth is aligned with the provision
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	of improved sustainable transport infrastructure, thereby encouraging a behavioural shift towards more sustainable travel patterns and reducing reliance on private car use. CE Recommendation – Adamstown SDZ West That the proposed Variation is made without Point 1 of MA2.1 relating to Dart+SW as follows: 1. Development may not commence until Dart+ Southwest has commenced construction. And That the proposed Variation is made with Point 3f. of MA2.1 as follows: f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth. For clarity, if agreed as above the SLO would read as follows: CS7 SLO4: Development on RES-N zoned lands to the west of Adamstown SDZ shall comply with the following: 1. Development may not commence until Dart+ Southwest has commenced construction. 2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.
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	3. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: a. Retention and enhancement of the east-west hedgerow in the northern part of the site as recorded on 1st Edition OS maps, unless required for wider movement needs, interventions in or adjacent to the woodland should be informed by EcIA and SDCC will support the maintenance of such habitat as a refuge for wildlife, b. A Social Infrastructure Audit and provision within development proposals to address any needs identified, c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, d. A Public Open Space Audit to inform proposals for public open space and recreational facilities, e. Provision for future infrastructure and access connections to lands to the south and west, including reservation for a future vehicular bridge over the railway line, unless determined otherwise in writing by the planning authority; and f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth. Tubber Lane North (MA4.1) The Planning Authority notes the NTA's request to remove the reference to DART+ SW from the SLO, on the basis that such a link is not considered relevant for the development of the site. In this regard, it is important to note that the NTA's original submission to the proposed Variation did not definitively seek the removal of a transport-related
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	delivery trigger, but rather questioned the specific linkage between the development of Tubber Lane and the delivery of DART+SW. The NTA stated: <i>“The NTA notes that the proposed variation includes a condition that development at Tubber Lane may not commence until Dart+ Southwest has commenced construction. Given the site’s location 1.5km from Adamstown Station, the link between the development of this site and the DART+ Southwest scheme is not clear. While development at Tubber Lane will require significant investment in transport infrastructure and services, the NTA would be of the view that this would relate to bus services and active travel infrastructure primarily. Based on the above, the NTA are of the view that South Dublin County Council may wish to review the condition attached to development at the site to the north of Tubber Lane.”</i> Having considered the NTA's submission, together with the site's strategic location adjacent to the Adamstown SDZ, South Dublin County Council remains satisfied that it is appropriate to maintain a clear relationship between the delivery of development and the provision of high-capacity public transport infrastructure. While the NTA have indicated that such a condition is not relevant for this site, the Council considers, as set out in the CE Response to the NTAs original submission on the proposed Variation, that linking the delivery of housing to strategic public transport investment is consistent with the principles of sustainable development and integrated land use and transport planning. In particular, while acknowledging the distance to Adamstown train station from Tubber Lane North of some 1.5km, it is still considered accessible to new residents by way of walking, cycling or bus connections. The provision of an improved alternative public transport service, in the form of Dart+SW, is considered to provide improved options to residents in the vicinity and to help build-in behaviours encouraging higher public transport use. However, given the NTAs concern at the inclusion of ‘an equivalent rail service’ it is recommended that the wording of the originally proposed Variation is retained,
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	this would also reflect the recommendation for Adamstown SDZ West on this point, as follows: CS7 SLO5 Development may not commence until Dart+ Southwest has commenced construction. CE Recommendation – Tubber Lane North That the proposed Variation is made without Point 1 of MA4.1 relating to Dart+SW as follows: 1. Development may not commence until Dart+ Southwest has commenced construction. And That the proposed Variation is made with points 4, b, c, e, f, g and h of MA4.1, shown in bold as follows: 4 b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by an EclA and generally support the maintenance of such habitat as a refuge for wildlife, 4 c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance,
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	4 e. A Social Infrastructure Audit and provision within development proposals to address any needs identified, and to provide the planning framework to address social infrastructure and proactively engage with the relevant state agencies, 4 f. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as defined in the Sustainable Residential Development and Compact Settlement Guidelines, 4 g. A Public Open Space Audit to inform proposals for public open space and recreational facilities, having regard to environmental sensitivities and ensuring the provision of an appropriate balance of passive and active amenity in the public open space; and 4 h. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth. For clarity, if agreed the SLO would read as follows: CS7 SLO5: Development on RES-N zoned lands north of Tubber Lane shall comply with the following: 1. Development may not commence until Dart+ Southwest has commenced construction. 2. Development may not commence until Tobermaclugg Park, a phasing requirement of the Adamstown SDZ Planning Scheme, has commenced construction.
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	3. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. 4. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: a. Retention and enhancement of the north-south hedgerow as recorded on 1st Edition OS maps, unless required for wider movement needs, b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by an EcIA and generally support the maintenance of such habitat as a refuge for wildlife, c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance, d. Ensure compliance with G13 (Riparian Corridors) in relation to any watercourses on site, e. A Social Infrastructure Audit and provision within development proposals to address any needs identified, and to provide the planning framework to address social infrastructure and proactively engage with the relevant states agencies, f. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as
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	defined in the Sustainable Residential Development and Compact Settlement Guidelines, g. A Public Open Space Audit to inform proposals for public open space and recreational facilities, having regard to environmental sensitivities and ensuring the provision of an appropriate balance of passive and active amenity in the public open space; and h. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.
Other Material Alterations The NTA does not have any significant concerns with MA7.1 (Edmondstown Road), MA9.1 (Knockmeenagh Framework Site), MA14.1 (Foxhunter), MA16.1, MA16.2 (Liffey Valley MRC), MA17.1, MA17.2 (Adamstown South and West), MA42.4 (ABTAs) and MA67.1 (Whitechurch-Edmondstown Connecting Road).	The Planning Authority welcomes the NTA's position on MA7.1 (Edmondstown Road), MA9.1 (Knockmeenagh Framework Site), MA14.1 (Foxhunter), MA16.1, MA16.2 (Liffey Valley MRC), MA17.1, MA17.2 (Adamstown South and West), MA42.4 (ABTAs) and MA67.1 (Whitechurch-Edmondstown Connecting Road). It is noted that MA68.4 covers the parking policy for Liffey Valley as part of a wider parking policy for the county (inadvertently briefly published as MA16.2 before being removed). CE Recommendation – Other Material Alterations To make the Variation with MA7.1 (Edmondstown Road); MA9.1 (Knockmeenagh Framework Site); MA14.1 (Foxhunter); MA16.1 (Liffey Valley MRC); MA17.1, MA17.2 (Adamstown South and West); MA42.4 (ABTAs) and MA67.1 (Whitechurch-Edmondstown Connecting Road) to Variation No. 2 to the South Dublin County Development Plan 2022-2028.
	Conclusion It is noted that the NPF Implementation Guidelines (2025) requests local authorities to reflect additional provision of land of up to 50% over and above what is required to meet the requirements set out in Appendix 1 of the guidelines. Policy and Objective 2 states the following: <i>‘It is a policy and objective of these Guidelines that ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set</i>

	<i>out in Appendix 1 is reflected within the relevant City or County Development Plan'</i> The Chief Executive is aware of the reduction in housing delivery capacity arising from the proposed Material Alterations. Initially, the land supply comprised 156.5 hectares with the potential to deliver approximately 7,324 new homes, representing 45% additional provision provided for under the Guidelines. However, following consideration of the proposed Material Alterations, the housing delivery capacity is reduced to 127.76 hectares of land with the potential to deliver approximately 5,649 new homes, thereby reducing the additional provision to 30%. The additional constraints relating to the requirement for Dart+SW to be operational before development commences at Adamstown SDZ West, is estimated to reduce housing capacity within the lifetime of the Plan by a further 1,019 homes. This would result in the additional provision being reduced to approximately 20%, further reducing the flexibility in delivering on the baseline targets set out by the Revised NPF and the Housing Growth Guidelines. Given the significant reduction in the overall housing delivery potential in the county, and to ensure compliance with the OPR recommendation, the Chief Executive recommends that the Material Alterations at Finnstown Castle (MA3.1), St. Edmundsbury (MA6.1) and Coldcut Road (MA11.1), are not made and that the originally proposed zoning and associated SLOs are agreed. Further to that, the Material Alterations concerning point 1 in each of CS7 SLO4 (MA2.1 at Adamstown SDZ West) and CS7 SLO5 (MA4.1 at Tubber Lane North) are not made and that the wording reverts to the originally proposed Variation to allow for development to commence upon the commencement of construction of DART+ SW. This will ensure that the proposed Variation provides an appropriate level of housing capacity and flexibility to support the achievement of the County's housing growth requirements.
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Section 3 – Summary of the Issues Raised by Other Persons and the Response and the Chief Executive's Response and Recommendation

3.1 Issues raised relating to the Proposed Material Alterations

MA1.1	
Amendment Ref. No. 1 Ballynakelly, Newcastle (Book of Mapping) Amendment Ref. No. 51 (Written Statement)	
CDP Section(s)	Page(s)
Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town	74-76
To amend CS9 SLO5 in Variation No. 2, Amendment No. 1 Ballynakelly as follows: CS9 SLO5: Development on RES-N zoned land south of Ballynakelly shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority and noted by the relevant area committee in advance of the submission of a planning application for residential development which provides for, inter alia: 1.Delivery of a public park of a minimum of 2 hectares in tandem with, or prior to, development of the site, 2.Reservation of a secondary school site of 3 hectares unless otherwise agreed in writing by the planning authority having regard to the requirements of the Department of Education and Youth, 3.Active travel connections to the existing Taobh Chnoic Park and land to the east, and 4.Use of the existing unfinished structure on site in an early phase of development in a sustainable manner which is compatible with neighbouring residential uses, with consideration given to the facilitation of uses such as sports / community space where feasible.	
Submission No.	

SD-C431-4 Cllr Francis Timmons	SD-C431-7 Rohit Gulati	SD-C431-439 Department of Education and Youth	SD-C431-416 Department of Defence
Summary	CE Response		
A submission from Cllr Timmons indicates support for the changes made to the SLO regarding the existing unfinished structure, citing that the Ballynakelly site is an opportunity to deliver a sports and community facility. The submission further indicates support on behalf of the Newcastle Community Council and the Newcastle Secondary School campaign in relation to the material alterations to the SLO referring to lands at Ballynakelly being rezoned as New Residential 'RES-N' and Open Space 'OS'. A further submission supports the material alterations and changes to the rezoning of the lands. The Department of Defence submission highlights the importance of safeguarding the long-term operational capability of Casement Aerodrome when considering future development in the Grange Castle, Citywest, Newcastle and Adamstown areas. It notes that any increase in building heights or population density could affect the approach and departure paths associated with Runway 22 and Runway 04, potentially impacting aviation safety and operations. Concern is raised in relation to Runway 10/28, the aerodrome's longest runway, which is essential for larger aircraft operations, including	At the Special Council Meeting in June which considered the proposed draft Variation no. 2 the Members voted to progress Amendment No. 1 in Ballynakelly, Newcastle to rezone the lands as proposed in the draft. Material Alterations were proposed to the Specific Local Objective (CS9 SLO5) as outlined above, with changes from the draft Variation outlined in bold. It is noted that submissions generally support the proposed material alterations. While support for the wider SLO is noted, where submissions do not directly relate to the proposed material alterations, they are out of scope at this stage of the process. It is noted that the submission from the Department of Education and Youth refers back to their earlier submission, noting the potential for increase in both primary and post-primary school demand. The submission from the Department of Defence is noted. Policy and objectives relating to Casement Aerodrome (Policy IE9) and to proposed development within the various aviation constraints are included in the County Development Plan (CDP). These objectives will be considered as part of the preparation of the required masterplan process outlined in the SLO and will also inform any assessment of planning applications which fall within the different aviation constraints. It is also noted that planning applications are referred to the Department of Defence, as relevant, and their submissions considered as part of assessment of development.		

maritime patrol aircraft, ministerial air transport and foreign state flights. The submission emphasises that development which penetrates protected airspace surfaces or increases risk within designated Public Safety Zones could result in operational restrictions, the loss of instrument procedures, reduced runway availability and, ultimately, a reduction in critical aviation capability. Accordingly, it seeks to ensure that future zoning decisions, building height policies and development proposals remain compatible with the aerodrome's operational requirements, and that any development in close proximity to Casement Aerodrome is appropriately assessed for its potential impact on flight operations.

Department of Education and Youth

The submission from the Department of Education and Youth notes that there is an increase in the total number of potential units in Newcastle from 516 to 733 following the material alterations. The Department notes that this change does not change comments made in their submission to earlier stage of the Variation, where they indicated there could be an increase in primary school place demand which could potentially be met by possible expansion of existing facilities. In the context of post primary provision it was stated *'...the projected growth figures could see a significant increase in post primary school place demand, which potentially could be accommodated within existing post primary schools and current capital projects.'*

In summary, submissions related to this site have expressed their support for the inclusion of a school, as well as the potential sports facility/community space that will be considered as a potential use for the unfinished structure on the site.

Regarding Casement Aerodrome, the existing objectives in the CDP will be taken account of in preparing the masterplan and where planning applications overlap with safeguarding areas planning applications will be referred to the Department of Defence and any submission received considered as part of the planning assessment.

It is recommended that revisions to the wording of the SLO, which are considered minor in nature, be made to clarify internal procedures for the masterplan. The proposed revisions are procedural in nature and do not alter the substantive planning objectives or development requirements contained within CS9 SLO5.

CE Recommendation To make a minor modification (in <i>bold italic</i>) to the SLO for the lands Ballynakelly, Newcastle and the SLO to read as follows: Development on RES-N zoned land south of Ballynakelly shall be in accordance with a masterplan for the lands to be prepared by, <i>or in consultation with,</i> the planning authority and approved by the <i>Council</i> in advance of the submission of a planning application for residential development which provides for, inter alia: 1.Delivery of a public park of a minimum of 2 hectares in tandem with, or prior to, development of the site, 2.Reservation of a secondary school site of 3 hectares unless otherwise agreed in writing by the planning authority having regard to the requirements of the Department of Education and Youth, 3.Active travel connections to the existing Taobh Chnoic Park and land to the east; and 4.Use of the existing unfinished structure on site in an early phase of development in a sustainable manner which is compatible with neighbouring residential uses, with consideration given to the facilitation of uses such as sports / community space where feasible.	

MA2.1	
Amendment Ref. No. 2 Adamstown SDZ West (Book of Maps) Amendment Ref. No. 50 (Written Statement)	
CDP Section(s)	Page(s)
Section 2.7.1 Dublin City and Suburbs	72
To amend CS7 SLO4 in Variation No. 2, Amendment No. 2 Adamstown SDZ West as follows: CS7 SLO4: Development on RES-N zoned lands to the west of Adamstown SDZ shall comply with the following: 1. No significant residential development other than infrastructure necessary to facilitate the delivery of strategic transport infrastructure shall commence until DART+ Southwest, or an equivalent rail service, is operational. - An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. - A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: - Retention and enhancement of the east-west hedgerow in the northern part of the site as recorded on 1st Edition OS maps, unless required for wider movement needs, interventions in or adjacent to the woodland should be informed by EcIA and SDCC will support the maintenance of such habitat as a refuge for wildlife, - A Social Infrastructure Audit and provision within development proposals to address any needs identified, - A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, - A Public Open Space Audit to inform proposals for public open space and recreational facilities, and - Provision for future infrastructure and access connections to lands to the south and west, including reservation for a future vehicular bridge over the railway line, unless determined otherwise in writing by the planning authority; and	

f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth.

Submission No.

SD-C431-33 Julie Edwards	SD-C431-84 William Lavelle	SD-C431-104 Local Resident
SD-C431-124 Kate Henry	SD-C431-131 Rita Nolan	SD-C431-134 John Kelly
SD-C431-135 Shane Nestor	SD-C431-136 Eileen Dennehy	SD-C431-150 Catherine O'Donnell
SD-C431-151 Kevin Nolan	SD-C431-152 John O'Donnell	SD-C431-157 Michael Murphy
SD-C431-158 Sophie Henry	SD-C431-160 Valentina Santamaria	SD-C431-161 National Transport Authority
SD-C431-179 Sarah O'Donnell	SD-C431-182 Sean Giblin	SD-C431-237 Emma Murphy
SD-C431-238 Sandra M	SD-C431-253 Seán Ó Rudáí	SD-C431-258 Patrycja Demianiuk
SD-C431-277 Office of Public Works	SD-C431-339 Ciaran O'Toole	SD-C431-348 Roberta McCarthy
SD-C431-349 Roberta McCarthy	SD-C431-360 Donal Curran	SD-C431-365 Caroline O'Brien
SD-C431-366 John O'Brien	SD-C431-367 Hermitage Park	SD-C431-439 Department of Education and Youth
SD-C431-444 Josip Pavlic	SD-C431-459 Darren Brennan	SD-C431-467 Evara Developments Ltd
SD-C431-488 Office of the Planning Regulator	SD-C431-494 LIONA O'TOOLE	SD-C431-497 Paul Gogarty
SD-C431-501 LIONA O'TOOLE	SD-C431-522 Ashleigh D'Arcy	SD-C431-522 Ashleigh D'Arcy
SD-C431-558 Ben Healy	SD-C431-562 Luke Heffernan	SD-C431-563 Caroline Carney

Summary	CE Response
The submissions largely support MA2.1. Concerns are raised regarding existing infrastructure capacity, traffic congestion and public transport provision in the wider Lucan area. It is stated that improved and extended rail services should be delivered in advance of further residential development.	CS7 SLO4 This Material Alteration (MA) relates to two alterations to CS7 SLO4 agreed at the Special Council Meetings in June 2026, each outlined in bold above, for the lands at Adamstown SDZ West. The first alteration within the SLO relates to the phasing of DART+SW and the commencement of development on the lands (Point 1 of the SLO),

Transport Infrastructure and DART+Southwest

The dominant issue raised across the submissions was strong support for retaining the requirement that no significant residential development should commence until DART+Southwest, or an equivalent rail service, is operational. Respondents argued that Lucan and Adamstown have already experienced substantial housing growth without corresponding transport investment, resulting in congestion, increased car dependency, pollution and a reduced quality of life. Many submissions emphasised that requiring the rail service to be operational, rather than merely commenced, would provide certainty that sustainable transport infrastructure is in place when future residents move into the area and would support proper planning, climate objectives and infrastructure-led growth. Submissions also highlighted concerns regarding the sequencing of development and infrastructure delivery, with respondents seeking stronger safeguards to ensure that transport, social, community and other supporting infrastructure are delivered in advance of, or alongside, new housing, thereby facilitating coordinated and sustainable growth.

Some contributors highlighted concerns regarding parking capacity and transport management. They referred to existing parking pressures experienced in other growth areas across South Dublin County and argued that future development should include appropriate parking provision, bicycle storage and

whilst the second material alteration proposes to include point 3 (f) in the SLO.

Proposed Variation - Special Meeting

At the Special Council Meetings in June 2026, the Elected Members resolved to make material alterations to proposed Variation No. 2 to the South Dublin County Development Plan 2022–2028. This involved the insertion of a new point 3.f in CS7 SLO4 in relation to educational capacity and the changing of the wording of point 1 of the SLO relating to Dart+SW. The material alteration for the latter changed the wording of the proposed Variation from:

1. Development may not commence until Dart+ Southwest has commenced construction.

To

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

Transport Infrastructure and DART+SW – point 1 of CS7 SLO4

It is noted that a number of submissions supported the change to point 1 of the SLO in the MA, to ensure that no residential development shall commence until DART+SW is **operational**. The key impact of this material alteration is the change from the original requirement for DART+SW to have commenced **construction** in parallel or before any development commenced on the lands to the need for DART+SW to be **operational** before any significant residential development commences.

electric vehicle charging facilities. The issue was framed as part of a broader need to ensure that supporting infrastructure keeps pace with population growth and avoids repeating problems experienced in other recently developed areas.

NTA

In relation to MA 2.1 (Adamstown West), the NTA expressed concern regarding the inclusion of the phrase ‘or equivalent rail service is operational’ as part of the SLO of Adamstown SDZ West. The NTA reiterate their position from the first stage of the Variation that the condition (SLO), as originally worded, could unnecessarily constrain housing delivery in one of the County’s most accessible and sustainable locations, effectively prioritising growth in less accessible locations than Adamstown West.

The NTA notes that DART+ SW is intended to significantly increase rail capacity over time and the increased level of service may be introduced on a phased basis.

The meaning of “equivalent rail service” and its consequences for meeting the housing targets is considered to be unclear. Notwithstanding their position on constraints being placed on development by the inclusion of ‘or equivalent rail service’, the NTA have indicated their willingness to assist in defining what would constitute an equivalent rail service to ensure that these sites, Adamstown West in

The NTA have reiterated in their submission that ‘*where it can be demonstrated that sites where accessibility to existing services, including transport, is relatively high and where their development would constitute the consolidation of the built-up area of Metropolitan Dublin or would be contiguous to the built-up area it may not be in the best interest of maximising transport and land use integration to constrain the development of such sites*’. The proposed MA is considered to unnecessarily constrain housing delivery on these lands at a location which have been indicated by the NTA as having medium to high accessibility and preferable to lands which are less accessible.

The landowner also objects to the amended wording. They indicate that the original wording, which linked development to the commencement of DART+SW construction, represented a more proportionate and practical trigger. They state that Adamstown West already benefits from existing public transport services with improvements planned for 2027 and that the originally proposed wording in the Variation would allow the strategic DART+ Southwest project and residential delivery to progress together. It is noted that they indicate that their transport study looking at the implications of the MA, made as part of the submission, made clear that the proposed MA would significantly delay housing delivery. However, the ‘commencement’ of construction trigger was considered to provide an appropriate balance between infrastructure delivery and timely housing provision.

The NTA also take issue with the inclusion in the MA and of reference to ‘or equivalent rail service’ being operational.

In relation to ‘an equivalent rail service’, as part of the CE response to a motion in June it had been recommended to include ‘or

particular, can be brought forward in a phased manner in advance of more peripheral sites.

Educational Capacity

A significant number of submissions highlighted the need for educational infrastructure to be delivered in tandem with residential development. Respondents expressed concern that existing schools are already under pressure and that future residents should have access to adequate local school places from the outset. There was support for the objective requiring adequate educational capacity for lands adjoining Adamstown to be provided in consultation with the Department of Education and Youth, with contributors stressing that school provision must form an integral part of any future development strategy.

Several submissions argued that housing development should be linked to the delivery of broader social infrastructure. Concerns were raised that there is no explicit requirement for developers to facilitate or provide lands for essential community facilities such as schools, Garda stations, fire stations, community centres, recreational facilities and local services. Respondents maintained that sustainable communities require more than housing alone and that key public services should be planned and delivered before or alongside residential development.

commencement of an equivalent rail service to the Dart' to the original wording of the SLO.

The rationale for the proposed CE revision, as set out in both the CE Report and the response to the motion, was to ensure that residential development remained aligned with sustainable transport investment. It was intended to provide flexibility for a potential alternative rail service to DART+ Southwest, such as battery train technology, which may be capable of delivering enhanced rail services with potentially less supporting infrastructure than that required for DART+ Southwest, should such solutions come forward in advance of DART+SW delivery.

The MA which Members agreed to go out on public display included reference to this 'equivalent rail service' alongside the change to the need for DART+SW to have commenced 'operation' rather than the original wording to have commenced 'construction'.

The Chief Executive is of the view that point 1 of the material alteration wording (MA2.1), requiring DART+ SW service to be **operational** before residential development commences will introduce an unnecessary and unreasonable delay to the delivery of housing. This is in the context of the existing rail and bus services which, while improvements to both are necessary and planned, would cater for development in the interim on the clear basis that **construction** of DART+SW had commenced. This linking of development to the commencement of **construction** of DART+ Southwest, as provided for in the original SLO, facilitates an appropriate and reasonable mechanism to coordinate the phased delivery of housing and strategic transport infrastructure, further supported by the Transport and Traffic Assessment required as part of the Masterplan in the SLO. This approach has regard to the cumulative

The Department of Education and Youth notes the material amendment to as it relates to ensuring adequate educational capacity for sites adjacent to Adamstown. They reiterate their submission to the Variation in March 2026 where it was stated ‘A population of this magnitude could see a potential future requirement for at least two additional primary schools in the area and a potential future requirement for a post primary school in the Lucan, Adamstown, Palmerstown area would need to be considered.’

Landowner Submission (Evara Developments Ltd)

Evara Developments supported the educational capacity objective and the requirement for social infrastructure planning and included a Social Infrastructure Audit which reflected this support. However, they object to the amended DART+SouthWest wording and request that the SLO revert to the original Variation wording, which linked development to the commencement of DART+SW construction. This is considered to represent a more proportionate and practical trigger, which would allow housing delivery to commence in 2028 in line with the currently published programme for Dart+Southwest. Evara state that Adamstown West already benefits from existing and planned public transport services, including high-frequency BusConnects services with improvements proposed by the NTA, and that the original wording linked to commencement of construction of DART+Southwest

impact of housing delivery in the surrounding area and the need to make every effort to encourage a behavioural change and reduction in private transport use based on the Avoid – Shift – Improve approach, to ensure that sufficient capacity remains on the existing road infrastructure for public transport and for those with less choice in their transport options. The inclusion of the original SLO supports the timely delivery of housing while ensuring that future growth is aligned with the provision of improvements to sustainable transport infrastructure, thereby encouraging a shift towards more sustainable travel patterns and reducing reliance on private car use.

It is noted that the landowner / developer has indicated that the link to construction trigger would enable Evara to commence the delivery of homes within the lifetime of the current County Development Plan on a phased basis. However, given the current programme for Dart+Southwest the rail service is unlikely to be operational before 2030 and as such, the proposed MA would significantly delay the delivery of housing. The associated assessment by AtkinsRéalis concluded that the proposed restriction places disproportionate reliance on a single transport project, in an area with high levels of accessibility supported by existing rail services, high-frequency bus services, active travel infrastructure and a well-connected road network with multiple access points.

Therefore, having regard to the planning merits of the site, its strategic contribution to housing delivery, the original SLO provisions relating to DART+SW, and the rationale outlined above, the Chief Executive is satisfied that the matters raised are adequately addressed through the inclusion in the SLO of the original Variation wording. The Chief Executive therefore recommends that MA2.1 is not made where it relates to DART+SW.

would allow housing delivery to occur in parallel with the strategic transport infrastructure represented by DART+Southwest. The submission was supported by an assessment, carried out on behalf of Evra by AtkinsRéalis, of the implications of the proposed restriction linking significant residential development on the lands to the operation of Dart+SW, or an equivalent rail service. The study examined the existing and planned public transport network serving the area, the NTA submission and the response of the CE to the proposed MA in the CE Report. The study concluded that ‘available evidence does not demonstrate that development of the lands is dependent upon DART+ SouthWest becoming operational’.

Department of Education and Youth (DoEY)

A submission was received from DoEY which noted the proposed amendment.

OPR

The OPR has indicated concerns regarding MA 2.1, and the proposed requirement for DART+ Southwest or an equivalent rail service to be operational prior to significant residential development commencing at Adamstown SDZ West. They state that given the timelines involved in the delivery of a project of this nature, the effect of the objective is that the lands will not deliver housing within the plan period, further undermining the ability of the Planning Authority to meet the Housing Growth Guidelines. In

For the same reasons, the CE is in agreement with the OPRs recommendation that the Planning Authority makes the proposed Variation without MA2.1 as it relates to Dart+SW being operational.

Education – point 3.f. of CS7 SLO4

The submission from the Department of Education and Youth has noted the inclusion of the proposed amendment and has reiterated that the proposed population in the area indicates a potential future requirement for at least two additional primary schools in the area and a potential future requirement for a post primary school in the Lucan, Adamstown, Palmerstown area would need to be considered. The Planning Authority will continue to engage with the Department on the delivery of schools.

The landowner’s indication of their support for engagement on educational capacity is welcomed. The support of many submissions for the inclusion of this point within the SLO is noted.

For these reasons, and in the interests of proper planning and sustainable development, the CE recommends making the proposed Variation with MA2.1 point 3 (f) relating to education.

Other

The OPW submission is not addressing either of the two published material alterations but is in relation to the SFRA and is responded to in Section 3.3 on the Environmental Assessments.

Conclusion

The Chief Executive is in support of point 3(f) introduced through the Material Alteration to ensure that educational-capacity requirements

this regard the OPR has made MA Recommendation 1 which, amongst other things, recommends that the Planning Authority makes the proposed Variation without MA2.1 (See section 2 of the CE Report for the full recommendation and CE Response).

OPW and SFRA

The OPW made a submission relating to the Strategic Flood Risk Assessment (SFRA) as it relates to the lands at Adamstown West. The CE Response to this is dealt with in the Environmental Assessment section of this report, section 3.3.

are identified and addressed in consultation with the Department of Education and Youth. For this reason, it is recommended that MA2.1 be made in relation to point 3(f).

The Chief Executive does not support the amendment to point 1. Requiring DART+ Southwest to be operational before significant residential development commences would make housing delivery on this site dependent on the completion and operation of a major strategic transport project. Having regard to the anticipated delivery timescale, this would be likely to defer housing delivery on the lands beyond the current Development Plan period and materially reduce the flexibility available to meet the revised housing requirement for the County.

The original wording provides a more proportionate and effective phasing mechanism. It prevents development from commencing until construction of DART+ Southwest has commenced, thereby establishing a clear relationship between housing delivery and committed strategic transport investment, while allowing both to progress in parallel. This safeguard operates alongside the masterplan, Transport and Traffic Assessment and cumulative-impact requirements contained in CS7 SLO4.

It is further noted that the OPR includes in its Recommendation 1 that the planning authority makes the proposed variation without the MA 2.1. The rationale for this recommendation was that, alongside MA3.1; 6.1 and 11.1, the requirement for DART+SW to be operational in advance of commencement of construction at Adamstown West would jeopardise the achievement of housing delivery targets during the plan period. Consequently, MA2.1 was considered to risk constraining the availability of housing needed to meet projected demand.

	It is recommended to make the Variation with MA2.1 insofar as it inserts point 3(f) relating to educational capacity, but without MA2.1 insofar as it amends point 1 relating to DART+ Southwest. The effect of this recommendation is to retain the original construction-commencement trigger in point 1 to ensure sufficient lands are available to meet the housing delivery targets during the plan period, in line with the OPR recommendation, and to insert the new educational-capacity requirement at point 3(f).
CE Recommendation To make the Variation with MA2.1 insofar as it inserts point 3(f) relating to educational capacity, but without MA2.1 insofar as it amends point 1 relating to DART+ Southwest. CE Recommendation 1: Adamstown West, point 1 of CS7 SLO4 To make the Variation without MA2.1 as follows: 1. Development may not commence until Dart+ Southwest has commenced construction	
CE Recommendation 2: Adamstown West, point 3f of CS7 SLO4 To make the Variation with MA2.1 as follows: 3 f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth. For clarity, subject to approval of the above CE Recommendations 1 and 2, CS7 SLO4 for amendment no.2, Adamstown SDZ West, will read: CS7 SLO4:	

Development on RES-N zoned lands to the west of Adamstown SDZ shall comply with the following:

1. Development may not commence until Dart+ Southwest has commenced construction

2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.

3. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia:

a. Retention and enhancement of the east-west hedgerow in the northern part of the site as recorded on 1st Edition OS maps, unless required for wider movement needs, interventions in or adjacent to the woodland should be informed by EcIA and SDCC will support the maintenance of such habitat as a refuge for wildlife,

b. A Social Infrastructure Audit and provision within development proposals to address any needs identified,

c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact,

d. A Public Open Space Audit to inform proposals for public open space and recreational facilities, ~~and~~

e. Provision for future infrastructure and access connections to lands to the south and west, including reservation for a future vehicular bridge over the railway line, unless determined otherwise in writing by the planning authority; **and**

f. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth.

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[SD-C431-1418 Helen Prendergast](#)

[SD-C431-1419 Hilary Dowling](#)
[SD-C431-1425 James Monaghan](#)
[SD-C431-1428 Joe Mc Cormack](#)
[SD-C431-1434 Jonathan Cully](#)
[SD-C431-1444 Julie Monaghan](#)
[SD-C431-1448 Kate Sawyer](#)
[SD-C431-1452 Kieran Hallinan](#)
[SD-C431-1455 Lisa Butler](#)
[SD-C431-1459 Louise Mc Daid](#)
[SD-C431-1463 Marian Egan](#)
[SD-C431-1467 Martina Dunne](#)
[SD-C431-1471 Maureen Brady](#)
[SD-C431-1474 Michael Prendergast](#)
[SD-C431-1479 Nicky Smith](#)
[SD-C431-1482 Orla O Shea](#)
[SD-C431-1487 Patricia Daly](#)
[SD-C431-1490 Paula Slavin](#)
[SD-C431-1493 Phil Callaghan](#)
[SD-C431-1496 Phyllis Farrell](#)
[SD-C431-1499 Robert Nichol](#)
[SD-C431-1502 Sarah Prendergast](#)
[SD-C431-1505 Shauna Smith](#)
[SD-C431-1508 Steven O brien](#)
[SD-C431-1511 Thomas Nolan](#)
[SD-C431-1514 Vani Halepit](#)
[SD-C431-1517 Vladislava Jupatova](#)
[SD-C431-1520 Anthony Morton](#)
[SD-C431-1523 Ciara Gallagher](#)
[SD-C431-1526 David Harding](#)
[SD-C431-1529 Gillian O brien](#)
[SD-C431-1532 Kevin Doherty](#)

[SD-C431-1420 James Callaghan](#)
[SD-C431-1426 Jerry Pane](#)
[SD-C431-1432 John Handibode](#)
[SD-C431-1435 Joseph Geraghty](#)
[SD-C431-1445 Karen O Brien](#)
[SD-C431-1449 Kevin Donoghue](#)
[SD-C431-1453 L Harrington](#)
[SD-C431-1457 Elizabeth Griffin](#)
[SD-C431-1461 Lydia Jupatova](#)
[SD-C431-1465 Maria Grogan Kinsella](#)
[SD-C431-1469 Mary Manley](#)
[SD-C431-1472 Michael Feeney](#)
[SD-C431-1476 Naomi Kelly Anderson](#)
[SD-C431-1480 Ann Condron](#)
[SD-C431-1483 Owen Davis](#)
[SD-C431-1488 Patrick illegible](#)
[SD-C431-1491 Penny Keogh](#)
[SD-C431-1494 Philip Jordan](#)
[SD-C431-1497 Ravi Jadar](#)
[SD-C431-1500 Rory Downes](#)
[SD-C431-1503 Sean Feeney](#)
[SD-C431-1506 Sinead Farrell](#)
[SD-C431-1509 Stewart Dwyer](#)
[SD-C431-1512 Tony o Sullivan](#)
[SD-C431-1515 Vivienne Coyne](#)
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[SD-C431-1524 Danny Feeney](#)
[SD-C431-1527 Fionn Donoghue](#)
[SD-C431-1530 G Bellew](#)
[SD-C431-1533 Margaret Dowling](#)

[SD-C431-1424 James Dwyer](#)
[SD-C431-1427 Joanne Carolan](#)
[SD-C431-1433 John Slattery](#)
[SD-C431-1436 Josephine Griffin](#)
[SD-C431-1447 Karen Quinn](#)
[SD-C431-1450 Kevin Downes](#)
[SD-C431-1454 Laura Cooke](#)
[SD-C431-1458 Lorraine Tighe](#)
[SD-C431-1462 Maria illegible](#)
[SD-C431-1466 Marie O Sullivan](#)
[SD-C431-1470 Maura Butler](#)
[SD-C431-1473 Michael Lancaster](#)
[SD-C431-1477 Nathan Dooley](#)
[SD-C431-1481 Orla Duke](#)
[SD-C431-1486 Pat O Keeffe](#)
[SD-C431-1489 Patrick Randles](#)
[SD-C431-1492 Peter Mc Cabe](#)
[SD-C431-1495 Philomena Curran](#)
[SD-C431-1498 Richard Feeney](#)
[SD-C431-1501 Sandra Kinsella](#)
[SD-C431-1504 Sean Tighe](#)
[SD-C431-1507 Siobhan Whelan](#)
[SD-C431-1510 Susan Quinn](#)
[SD-C431-1513 Ultan Tuite](#)
[SD-C431-1516 Vivienne Mc Hugh](#)
[SD-C431-1519 Alfred Heffernan](#)
[SD-C431-1522 Christina o grady](#)
[SD-C431-1525 Dara Donoghue](#)
[SD-C431-1528 Gail Quinn](#)
[SD-C431-1531 Kate O Grady](#)
[SD-C431-1534 Mark Harding](#)

SD-C431-1541 Mark Hughes SD-C431-1545 Matthew Doherty SD-C431-1549 Paul Walsh SD-C431-1553 Roisin Harper SD-C431-1556 Susan Mills SD-C431-1708 David Marshall	SD-C431-1542 Mark Quinn SD-C431-1546 Michael May SD-C431-1550 Raymond O Connell SD-C431-1554 Seamus Harper SD-C431-1557 Tina Convy SD-C431-507 Pearse Carberry	SD-C431-1543 Martin Gallagher SD-C431-1547 Patricia Harding SD-C431-1551 Rita O Brien SD-C431-1555 Sean Harper SD-C431-1558 Tina Dwyer
Summary	CE Response	
Zoning The majority of submissions support the continued protection of the Finnstown lands and their removal from the proposed variation to the County Development Plan 2022–2028, supporting the decision of the Elected Members to reject the proposed residential rezoning and retain the existing Open Space zoning on the lands. These submissions included submissions from Cllr. O’Toole and Cllr. Casserly, as well as residents’ groups in the wider area. Open Space, Biodiversity and Green Infrastructure Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the loss of one of the last remaining green spaces in Lucan, impacts on biodiversity, wildlife habitats, ecological corridors and green infrastructure. Many submissions described the lands as the "last green lung" or remaining natural green buffer between Adamstown and Lucan. Concerns were raised regarding the loss	Material Alteration MA3.1 proposes ‘to omit Amendment Ref No3. Finnstown Castle’ from the proposed variation. Amendment No. 3 Finnstown Castle proposed a change of zoning of approximately 17.94 hectares from Open Space (OS) - <i>To preserve and provide for open space and recreational amenities</i> to ‘RES’ ‘<i>To protect/or improve residential amenity</i>’. The proposed rezoning, as originally published, was accompanied by a Specific Local Objective (SLO) CS7 SLO3 which stated: <i>Development on RES zoned lands at Finnstown Castle shall comply with the following:</i> <i>1. Development may not commence until Dart+ Southwest has commenced construction.</i> <i>2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.</i>	

of mature trees, hedgerows, habitats for birds, bats and other wildlife, and the contribution of the lands to biodiversity, climate resilience and ecological connectivity. Several submissions highlighted the increasing importance of retaining natural areas as surrounding lands continue to undergo urban development.

Heritage, Landscape, Character and Sense of Place

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the potential impact of development on the heritage, landscape character and cultural identity associated with Finnstown Castle and its surrounding lands. Many submissions referenced Finnstown Castle as an important protected structure and a significant element of Lucan's historic and cultural identity. Particular concern was expressed regarding the potential impact of residential development on the castle's setting, the tree-lined avenue, mature landscape features and the wider historic estate. Several submissions noted that previous planning proposals had been refused due to impacts on the heritage setting and emphasised that the protection of heritage extends beyond the building itself to include its surrounding landscape. Submissions also highlighted the role of the lands in maintaining Lucan's distinct character, sense of place and visual identity, providing an important transition between established and emerging urban areas. Concerns

3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia:

- a. Retention and enhancement of the hedgerow and tree line on the north-western boundary of the site as recorded on 1st Edition OS maps,*
- b. A Social Infrastructure Audit and provision within development proposals to address any needs identified,*
- c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact,*
- d. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage,*
- e. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and*
- f. Provision for direct active travel connections from the subject lands into Adamstown SDZ*

Variation Context and Process

For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end

were raised that development would erode the area's unique historical character, landscape distinctiveness and connection to the natural environment.

Traffic, Roads and Transport Capacity

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding existing traffic congestion, parking, road capacity constraints and insufficient public transport infrastructure. Many submissions stated that Newcastle Road, the R120, Lucan Village and surrounding junctions are already experiencing significant congestion, particularly during peak commuting and school times. Concerns were also raised regarding overcrowding on rail and bus services, delays to the DART+ South West project, and the potential for further residential development to exacerbate transport pressures before the delivery of appropriate infrastructure improvements.

NTA

A submission was received from the National Transport Authority which included observation on the lands at Finnstown and MA 3.1.

The NTA notes that the Greater Dublin Area Transport Strategy 2022-2042 is the statutory transport planning framework for South Dublin and emphasises that sites with strong accessibility to existing public transport services and local

of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate 2,086 units.

Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands but including further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. Following the full review process Variation No. 2 identified lands to increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land which included for 45% additional capacity. Alongside the identified capacity of existing zoned land of 9,613 units (160ha) the lands proposed for rezoning were considered sufficient to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. Given the approach taken to the Variation, it is considered that the settlement capacity study undertaken identified lands which have been carefully evaluated through a criteria-based approach to best meet the housing shortfall for 2028 with built-in additional capacity, noting that the Planning and Development (Amendment) Act 2026 facilitates the extension of the County Development Plan to August 2030.

Proposed Material Alteration to Omit Zoning

It is recognised that the majority of submissions support the omission of the rezoning at Finnstown for a variety of reasons, many of them raised at the draft Variation stage, and while responded to at that stage they are further responded to below.

amenities, particularly those within or adjoining the built-up area of Metropolitan Dublin, should not be unnecessarily constrained from development. In assessing the priority of lands under this variation, the NTA considers that the availability of rail services, the extensive bus network, and proximity to key services and trip attractors should be important factors in supporting sustainable transport and land use integration.

The NTA recommends that Material Alteration MA3.1 at Finnstown should not proceed and consider Finnstown Castle as a priority area for housing delivery. This is based on the site being already well served by public transport, with the C1, L53 and P29 bus routes providing 14 peak-hour services, including 12 to Dublin City Centre and 2 to Liffey Valley. It also benefits from proximity to Adamstown Station, which offers four AM peak-hour rail services to the city centre. Subject to improved pedestrian connectivity, the C2 route could also be within walking distance. Overall, the lands achieve a medium-high level of accessibility according to the NTA's Public Transport Accessibility Level (PTAL) assessment.

Community Infrastructure and Public Services

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the capacity of existing schools, healthcare services, childcare facilities, community infrastructure and public

However, the omission of these lands from the Variation will undermine the ability of the Planning Authority to support the delivery of the housing targets set by the Revised National Planning Framework. The lands meet the criteria for sustainable and compact development, having what the NTA describe as a medium to high accessibility level given their proximity to good bus services and improving train services. The lands are also proximate to local facilities and services including schools, shops, medical facilities, parks and recreation. They are currently in private ownership and not available to the public as open space or any other use.

Open Space, Biodiversity and Green Infrastructure

The proposed rezoning will change the character of the lands. However, the SEA identified the key features of ecological value on the lands as reflected in the requirement of the SLO, point 3 *a. Retention and enhancement of the hedgerow and tree line on the north-western boundary of the site as recorded on 1st Edition OS maps.*

The County Development Plan also includes an objective requiring developers to meet a Green Space Factor scoring when designing a housing layout, based around green infrastructure and climate change. The SLO also requires that any planning application be supported by appropriate studies having regard to the cumulative development potential of the area including a Public Open Space Audit to inform proposals for open space and recreational facilities. Any planning application would also be required to comply with the open space standards set out in the adopted County Development Plan.

As the lands are privately owned, questions relating to public acquisition fall outside the scope of the proposed rezoning. The

amenities. A recurring theme was that housing growth in Lucan, Adamstown and Clonburris has outpaced the delivery of supporting infrastructure. Submissions referred to shortages of school places, GP services, childcare facilities, recreational amenities, sports facilities and community services. Many argued that further housing should only proceed where adequate supporting infrastructure is already in place or committed.

Recreation, Amenity and Community Wellbeing

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the loss of valuable open space, recreation opportunities and community amenities, as well as the long-term protection and enhancement of the lands for public benefit.

Many submissions highlighted the importance of the lands as an accessible green space that contributes to recreation, exercise, social interaction, physical health and mental wellbeing in an increasingly urbanised area. The lands were viewed as a significant amenity resource for existing and future residents and as an opportunity to address growing demand for recreational facilities arising from population growth in Lucan and Adamstown. Numerous submissions advocated for the long-term protection of the lands and proposed that they be brought into public ownership and incorporated into

rezoning seeks to provide for future housing while ensuring that appropriate open space and recreational facilities form part of any development proposal. This would not preclude the potential for augmentation of the open space at Tandy's Lane Park as part of new development subject to a full planning assessment at planning application stage.

Heritage, Landscape, Character and Sense of Place

The protection of Finnstown Castle and its setting is expressly addressed through SLO point 1. Any future planning application must be accompanied by a Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage. This requirement ensures that the significance of Finnstown Castle, its historic avenue, landscape setting and associated heritage features are fully assessed and appropriately protected.

The rezoning itself does not grant permission for development. Any future proposal would be subject to detailed heritage assessment and would need to demonstrate compliance with County Development Plan policies relating to protected structures and architectural conservation. The SLO reinforces this through a clear mechanism to ensure that heritage considerations inform the design and layout of any future development.

Traffic, Roads and Transport Capacity

Traffic and transport concerns are directly addressed through the provisions of the SLO. Point 1 of the SLO sets out that development may not commence until DART+ Southwest has commenced construction, ensuring that the construction of strategic public transport infrastructure is aligned with development on the site.

an expanded Tandy's Lane Park, providing additional parkland, walking routes, playing fields, biodiversity areas and community facilities while preserving the historic setting of Finnstown Castle.

Overdevelopment and Cumulative Development Pressures

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the cumulative impacts of significant recent and planned residential development in the wider area. Many submissions referred to the scale of development already delivered through Adamstown SDZ and proposed through Clonburris. Concerns were raised that Lucan has accommodated a disproportionate share of growth, resulting in increasing pressure on roads, public transport, services, associated infrastructure, amenities and the environment. Several submissions argued that protecting the remaining strategic open spaces is essential to maintaining a balanced and sustainable urban environment.

Housing Need and Strategic Planning Justification

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the necessity and strategic justification for rezoning the lands for residential development. A number of submissions acknowledged the need to meet national housing

In addition, the SLO requires a planning application to include a Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate identified impacts. This will ensure that road network capacity, parking, junction performance, active travel and public transport requirements are comprehensively assessed and addressed.

The landowner indicates that they included a Transport Statement reviewing transport related issues as part of their original submission, outlining an evidence-based approach to the growth of the site, and notwithstanding the outcomes of the assessment, the submission notes the reasoning for the SLO and the transport related elements to ensure a robust approach to development on the site.

The Council notes the NTA's view that the lands at Finnstown should be included in the Variation. The NTA indicates that the site is well suited to residential development given its strong existing and planned public transport accessibility, including high-frequency bus services, proximity to Adamstown Railway Station, and future connectivity through DART+ Southwest. Consistent with the principles of transit-oriented development and compact growth, the NTA recommends that MA3.1 should not proceed as they consider it a priority site for inclusion in the Variation given its location.

Community and Social Infrastructure

The concerns regarding community infrastructure are specifically addressed by the SLO as follows:

3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia:

targets but argued that the Council's identified housing capacity already exceeds revised NPF requirements. These submissions contended that there is no compelling planning necessity to rezone the lands and that alternative locations exist within the county that can accommodate housing growth without sacrificing a strategically important amenity, heritage and ecological resource.

Sustainable and Plan-Led Development

Submissions outlined that they were in support of MA3.1 to remove the lands from the proposed rezoning and raised concerns regarding the consistency of the proposal with sustainable, infrastructure-led and plan-led development principles. Many submissions argued that any future residential development should be contingent upon the prior delivery of essential infrastructure, including transport, healthcare, education, utilities and community facilities, and that existing infrastructure in the wider Lucan, Adamstown and Clonburris area is already under significant pressure. Several submissions contended that the current Open Space/High Amenity zoning reflects the established role and function of the lands and should therefore be retained. Concerns were also raised regarding the planning justification for the proposed rezoning, its consistency with previous planning decisions and the wider planning framework, the adequacy of the evidence underpinning the proposal,

b. A Social Infrastructure Audit and provision within development proposals to address any needs identified,

Therefore, any future planning application must include a Social Infrastructure Audit and demonstrate how any identified needs will be addressed within the development proposal. This requirement ensures that the capacity of schools, childcare facilities, healthcare services and community facilities are assessed as part of the planning process. Furthermore, the infrastructure-led approach embedded within the SLO requires consideration of both site-specific and cumulative impacts before development can proceed. The rezoning therefore provides a framework for the assessment of infrastructure requirements and for appropriate mitigation or provision to be identified through the development-management process.

Overdevelopment and Cumulative Development Pressures

As outlined above, the SLO requires through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development to be informed by, inter alia, transport and traffic, social infrastructure, public open space and recreational facilities, heritage considerations, and the setting of the Protected Structure.

Specifically, the SLO requires the submission of a Transport and Traffic Assessment, Social Infrastructure Audit, Public Open Space Audit, and Design Statement, ensuring that the cumulative effects of development on infrastructure, services, amenity, landscape character and heritage assets are comprehensively assessed and addressed at planning application stage. This will enable the Planning Authority to evaluate both site-specific and wider area impacts and ensure that any

and the cumulative impacts of development on the area's landscape, amenity and infrastructure capacity.

OPR

A submission was received from the OPR recommending that the planning authority make the variation without the proposed MA 3.1 (see section 2 of this CE Report for full OPR recommendation and rationale).

Landowner

A submission was received on behalf of the landowners (From Armstrong Fenton) in response to the MA. The submission was in support of the lands being reinstated back into the variation and the material alteration for its removal be rejected on the following grounds:

- Need for additional housing delivery in line with national policy and Government housing targets.
- Capacity audit supports the inclusion of Finnstown based on an evidence-led assessment, compact growth principles, and transit-oriented development objectives.
- Notes the OPR's recommendation regarding the lands.
- Proposed densities are appropriate, with development expected to be phased in line with infrastructure delivery and the UE Infrastructure Masterplan.

development is appropriately phased and coordinated with surrounding growth areas.

Furthermore, any future development proposal will be required to comply with all relevant County Development Plan policies and objectives, including those relating to sustainable development, quality placemaking, biodiversity, green infrastructure, social and community infrastructure, heritage protection, transport and climate action. Compliance with these policies, together with the detailed requirements of the SLO, will ensure that cumulative impacts are appropriately managed and that development is integrated with the existing and planned infrastructure network in a sustainable and planned manner.

Conclusion

While most submissions object to the proposal to zone the lands at Finnstown, with some having acknowledged the need for housing, the strategic justification for rezoning these lands is reinforced by their location within Dublin City and Suburbs and the Metropolitan Area and their strong accessibility to existing and planned public transport infrastructure and services and facilities.

The rezoning of these lands is therefore consistent with the principles of compact growth and Transit-Oriented Development (TOD) promoted by the National Planning Framework, which seeks to focus residential growth within accessible locations that are well served by existing and planned public transport and close to employment, community facilities, education, retail and other essential services. The NTA has explicitly stated that lands with strong accessibility to public transport services are a priority and should be zoned in preference to lands in less accessible locations.

• Landowner supports the proposed Specific Local Objective (SLO) and will incorporate its requirements into future planning applications. • A Transport Statement (as part of the initial submission and subsequently referenced again) provided an evidence-based assessment of transport impacts and supports a phased, infrastructure-led approach to development, outlining the high levels of accessibility and development potential of the lands. • The site is privately owned, has not functioned as public open space, and existing and planned parks in Adamstown are considered sufficient to meet local needs. • Infrastructure considerations, including flood risk, utilities, transport, and road capacity, have been assessed, with development guided by the SLO, CDP requirements, and proximity to key services.	The proposed rezoning is supported by a robust framework of safeguards contained within the SLO, which ensures that development is both infrastructure-led and plan-led. The identification of these lands for residential development has been informed by the principles of Transit-Oriented Development (TOD) and compact growth, consistent with the objectives of the National Planning Framework (NPF), which seeks to direct growth to accessible locations within the existing built-up footprint of cities and towns where public transport, services and infrastructure can support sustainable communities. Finnstown is one of three sites identified to meet the targets within the period of the Development Plan which are now proposed to be omitted for rezoning through the material alterations. When the proposed Material Alterations arising from the Special Meetings of South Dublin County Council are taken into consideration, the capacity of the available lands to deliver the targets is significantly reduced. Initially, the land supply comprised 156.5 hectares with the potential to deliver approximately 7,324 new homes, representing 100% of the baseline requirement and 45% of the additional 50% headroom provided for under the Guidelines. However, following consideration of the proposed Material Alterations, the housing delivery capacity is reduced to 127.76 hectares of land with the potential to deliver approximately 5,649 new homes, thereby reducing the additional availability above the baseline requirement from 45% to 30%. Furthermore, additional constraints affecting the delivery of lands at Adamstown SDZ West, through the Specific Local Objective (SLO) is estimated to impact housing capacity by a potentially further 1,019 homes. This would result in the additional availability above the baseline requirement being reduced to approximately 20%, further diminishing the overall housing delivery potential of the proposed variation to the CDP 2022-2028.
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	The OPR has indicated that the removal of these lands would reduce the amount of land available for residential development, contrary to the Planning Authority's revised housing growth projections. Such a reduction in residential development capacity could limit the supply of housing land and potentially undermine the achievement of housing delivery targets over the lifetime of the Development Plan. Accordingly, the OPR considered that MA3.1 would risk constraining the availability of housing required to meet projected housing demand and therefore recommended that the lands remain included within the Variation (see Section 2 of this CE Report). Accordingly, having regard to the planning merits of the site, its capacity to contribute to the delivery of housing and national planning objectives, and to the Recommendation of the OPR, the Chief Executive recommends that the lands remain included within Variation No. 2 to the South Dublin County Development Plan 2022–2028, and the material alteration to the lands be rejected.
CE Recommendation To make the Variation without Material Alteration 3.1 and to include the lands as set out in the proposed variation amendment no.3 Finnstown Castle as follows: To zone the lands RES with the associated CS7 SLO3: CS7 SLO3: <i>Development on RES zoned lands at Finnstown Castle shall comply with the following:</i> <i>1. Development may not commence until Dart+ Southwest has commenced construction.</i> <i>2. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.</i>	

3. Through appropriate studies or otherwise and having regard to the cumulative development potential around and including the subject lands, planning applications for residential development on the subject lands shall be informed by and address, inter alia:

- a. Retention and enhancement of the hedgerow and tree line on the north-western boundary of the site as recorded on 1st Edition OS maps,*
- b. A Social Infrastructure Audit and provision within development proposals to address any needs identified,*
- c. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact,*
- d. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage,*
- e. A Public Open Space Audit to inform proposals for public open space and recreational facilities, and*
- f. Provision for direct active travel connections from the subject lands into Adamstown SDZ*

MA4.1	
Amendment Ref. No. 4 Tubber Lane North (Book of Maps) Amendment Ref. No. 50 (Written Statement)	
CDP Section(s)	Page(s)
Section 2.7.1 Dublin City and Suburbs	72
To amend CS7 SLO5 in Variation No. 4, Amendment No. 4 Tubber Lane North as follows: CS7 SLO5: Development on RES-N zoned lands north of Tubber Lane shall comply with the following: 1. Development may not commence until Dart+ Southwest has commenced construction or an equivalent rail service to the Dart+SW is operational, as may be relevant. 2. Development may not commence until Tobermaclugg Park, a phasing requirement of the Adamstown SDZ Planning Scheme, has commenced construction. 3. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application. 4. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia: a. Retention and enhancement of the north-south hedgerow as recorded on 1st Edition OS maps, unless required for wider movement needs, b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by an EcIA and generally support the maintenance of such habitat as a refuge for wildlife, c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance, d. Ensure compliance with G13 (Riparian Corridors) in relation to any watercourses on site,	

e **e.** A Social Infrastructure Audit and provision within development proposals to address any needs identified, **and to provide the planning framework to address social infrastructure and proactively engage with the relevant state agencies,**
 & **f.** A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, **and informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as defined in the Sustainable Residential Development and Compact Settlement Guidelines,**
 e **g.** A Public Open Space Audit to inform proposals for public open space and recreational facilities, **having regard to environmental sensitivities and ensuring the provision of an appropriate balance of passive and active amenity in the public open space; and**
h. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.

Submission No.

[SD-C431-161 National Transport Authority](#)

[SD-C431-367 Hermitage Park](#)

[SD-C431-561 Ben Healy](#)

[SD-C431-365 Caroline O'Brien](#)

[SD-C431-439 Department of Education and Youth](#)

[SD-C431-562 Luke Heffernan](#)

[SD-C431-366 John O'Brien](#)

[SD-C431-464 Development Applications Unit](#)

[SD-C431-563 Caroline Carney](#)

Summary

Public Transport – DART+SW

The majority of submissions expressed support for MA4.1, welcoming the inclusion of provisions that would ensure appropriate assessment, planning and consideration of infrastructure requirements before any development proceeds at Tubber Lane North. Respondents considered it important that development is subject to proper evaluation and planning processes in advance of implementation and supported the proposed alteration as a means of

CE Response

CS7 SLO5

This Material Alteration (MA) relates to a number of alterations to CS7 SLO5 agreed at the Special Council Meeting in June 2026, each outlined in bold above, for the lands at Tubber Lane North.

Proposed Variation - Special Meeting

At the Special Council Meetings in June 2026, the Elected Members resolved to amend Variation No. 5 to the South Dublin County Development Plan 2022–2028 by changing of the wording of point 1 relating to Dart+SW from that which went out on public display as:

promoting a managed and sustainable approach to the future development of the lands. A submission made on behalf of a local residents' association echoed this position, highlighting support for MA4.1 on the basis that adequate assessment and planning should precede any development on the site. The submission reflected community support for a phased and carefully considered approach to development, with appropriate planning safeguards in place before construction commences. One submission sought an amendment to the wording of MA4.1 rather than supporting it as drafted. The submission argued that the transport-related requirement should be strengthened by providing that no significant residential development should proceed until DART+ Southwest, or an equivalent public transport service with comparable capacity and frequency, is operational. The rationale was to ensure that substantial residential development is aligned with the availability of high-capacity public transport infrastructure and follows a transport-led approach to development. The submissions primarily relate to: Item 1 (DART+ Southwest / rail infrastructure requirement), either through support for MA4.1 generally or through a request to strengthen the transport-related wording.	1. Development may not commence until Dart+ Southwest has commenced construction. To 1. Development may not commence until Dart+ Southwest has commenced construction or an equivalent rail service to the Dart+SW is operational, as may be relevant. Public Transport – DART+SW The Planning Authority notes the broad support received for the proposed amended wording in MA4.1 relating to Tubber Lane North, including significant support for the requirement linking development to the delivery of DART+ South West and associated rail infrastructure. A request to further strengthen the proposed wording beyond that included in the Draft Variation and Material Alteration to add or an equivalent public transport service 'with comparable capacity and frequency' is noted. The NTA remains of the view that the condition linking development of the Tubber Lane lands to the delivery of DART+ South West is not necessary. In their original submission to the draft Variation, the NTA outlined that SDCC 'may wish to review the condition' for Tubber Lane stating that the site's transport requirements would primarily relate to enhanced bus services and active travel infrastructure. The NTA also takes issue with the inclusion in the MA of the phrase 'or equivalent rail service is operational' and indicates that the meaning of 'equivalent rail service' is not clear.
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Item 4(f) (transport and accessibility considerations), indirectly through concerns regarding the relationship between residential development and the provision of high-capacity public transport. NTA The NTA notes the inclusion of the phrase “<i>or equivalent rail service is operational</i>” within the amended SLO for Tubber Lane North. The NTA reiterates its previous position that a direct linkage between the development of the Tubber Lane lands and DART+ South West is not necessary, given the site's location and accessibility characteristics, and therefore considers that the condition should be removed in its entirety. The NTA further notes that the meaning of “<i>equivalent rail service</i>” is unclear and has indicated its willingness to engage with the Planning Authority in defining what might constitute such a service. However, the NTA's principal position remains that a development trigger linked to DART+ South West, or an equivalent rail service, is not required in the context of the Tubber Lane lands. Department of Education and Youth (DoEY) The Department notes the proposed amendment to include the following text – “ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.” DHLGH	In relation to the addition of ‘an equivalent rail service’, as part of the CE response to a motion in June it had been recommended to include ‘or commencement of an equivalent rail service to the Dart’ to the original wording of the SLO. The rationale for the proposed CE revision, as set out in both the CE Report and the response to the motion, was to ensure that residential development remained aligned with sustainable transport investment. It was intended to provide flexibility for a potential alternative rail service to DART+ Southwest, such as battery train technology, which may be capable of delivering enhanced rail services with potentially less supporting infrastructure than that required for DART+ Southwest, should such solutions come forward in advance of DART+SW delivery. The MA which Members agreed to go out on public display included reference to this ‘equivalent rail service is operational’. In relation to the Dart+SW project, the wording remains that development cannot commence until Dart+SW commences construction. The linking of development to the commencement of construction of DART+ Southwest, as retained from the original SLO, is considered to facilitate an appropriate and reasonable mechanism to coordinate the phased delivery of housing and strategic transport infrastructure, further supported by the Transport and Traffic Assessment required as part of the Masterplan in the SLO. It is recognised that the subject lands are located approximately 1.5km from Adamstown Rail Station, beyond the accessibility distances typically associated with rail-based public transport as set out in the Sustainable Residential Development and Compact Settlements Guidelines. However, the lands are easily accessible to the rail station
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The Development Applications Unit of the Department of Housing, Local Government and Heritage have flagged a recorded monument in their submission in response to MA4.1, related to Tubber Lane.	by bus and by a good cycle network, in addition to being walkable by some. As such, an improved rail service will offer a realistic and positive choice of public transport, helping to encourage a behavioural change and reduction in private transport use based on the Avoid – Shift – Improve approach. This approach also has regard to the cumulative impact of housing delivery in the surrounding area and the need to make every effort to make public transport one of choice, helping to ensure that sufficient capacity remains on the existing road infrastructure for improved bus services and for those with less choice in their transport options. Therefore, it remains the view of the Chief Executive that the inclusion of the original SLO supports the timely delivery of housing while ensuring that future growth is aligned with the provision of improvements to sustainable transport infrastructure, thereby encouraging a shift towards more sustainable travel patterns and reducing reliance on private car use. Having regard to the planning merits of the site, its strategic contribution to housing delivery, the original SLO provisions relating to DART+SW, and the rationale outlined above, the Chief Executive is satisfied that the SLO in point 1 should be retained. However, having regard to NTA concerns on the meaning of ‘an equivalent rail service’ outlined above, it is recommended that MA2.1 is not made where it relates to the inclusion of the wording around ‘an equivalent rail service’ and that the linkage to commencement of construction of DART+SW is sufficient without the additional wording of the MA point 1. Additionally, Item 4(f) of the SLO provides a further safeguard in relation to transport and accessibility considerations. It requires the
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	preparation of a Transport and Traffic Assessment to accompany any development proposal, detailing the impacts of the proposed development and identifying measures to mitigate those impacts. The assessment must be informed by options that can be demonstrated as being deliverable, whether as part of the development itself or through a phased approach, and must specifically consider opportunities to enhance connectivity to high-capacity public transport. The Chief Executive also acknowledges concerns raised regarding the potential impact of development on Tubber Lane as an established walking and cycling corridor. The promotion of active travel is a key objective of national policy, the County Development Plan and the Adamstown SDZ Planning Scheme. The subject lands will be integrated into an existing and expanding network of pedestrian and cycle routes linking Adamstown, Tobermaclugg Park and surrounding destinations. The SLO requires a masterplan-led approach that prioritises permeability, accessibility, safety and connectivity for pedestrians and cyclists, ensuring that development enhances rather than compromises existing active travel patterns along Tubber Lane, the Celbridge Link Road and adjoining routes. Furthermore, the application of DMURS principles will ensure that streets and public spaces are designed as people-focused environments that prioritise walking, cycling and public transport over private vehicle movement. Department of Education and Youth (DoEY) The Planning Authority notes the submission from the Department in relation to the amended SLO in MA4.1 and welcomes continued engagement on the proactive delivery of schools in the County. DHLGH - Heritage
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	No heritage concerns were raised in public submissions, however the DHLGH noted a recorded monument on site in their submission to the material alteration. Recorded Monument DU021-103 was identified in the submission. However, in further engagement with the Heritage section in the Department, it was confirmed that reference to DU021-103 was a typographical error, with DU017-103 being the correct archaeological reference. Notwithstanding this, the proposed SLO, together with the relevant archaeological and built heritage objectives of the County Development Plan, provide an appropriate framework to address both heritage assets through future masterplanning and development management processes. Conclusion Having considered the submissions relating to point 1 of the SLO and the linkage between the delivery of the lands and the commencement of construction of Dart+SW, the Chief Executive is of the view, for the reasons outlined above, that the wording of point 1 should be retained as it was in the original Variation and the MA for point 1 not be made. In relation to the remaining points in the Material Alteration, the Chief Executive is satisfied that the matters raised through the submissions can be appropriately addressed through the provisions of the SLO, including the requirement for a comprehensive masterplan, the preparation of a Transport and Traffic Assessment, the promotion of active travel and permeability, engagement with the Department of Education and Youth regarding educational capacity requirements, and the application of relevant County Development Plan objectives relating to infrastructure, education, archaeology and heritage. Therefore accordingly, recommends approval of the points b, c, h, and the additional text for e, f and g within M4.1.
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	It is noted that the OPR, did not specially comment on MA 4.1 but the original OPR recommendation was to proceed with the variation for the lands in question.
CE Recommendation 1: Tubber Lane North, point 1 of CS7 SLO5 To make the variation without MA4.1 so that point 1 of CS7 SLO5 reverts to the Proposed Variation as follows: 1. Development may not commence until Dart+ Southwest has commenced construction. CE Recommendation 2: Tubber Lane North point 4 (b, c, h (additional text) and e, f and g) of CS7 SLO5 To make Variation with MA4.1 as follows: 4.b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by an EcIA and generally support the maintenance of such habitat as a refuge for wildlife, 4 c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance, 4 e. A Social Infrastructure Audit and provision within development proposals to address any needs identified, and to provide the planning framework to address social infrastructure and proactively engage with the relevant state agencies, 4 f. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as defined in the Sustainable Residential Development and Compact Settlement Guidelines,	

4 g. A Public Open Space Audit to inform proposals for public open space and recreational facilities, having regard to environmental sensitivities and ensuring the provision of an appropriate balance of passive and active amenity in the public open space; and

4 h. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.

For clarity, subject to approval of the above CE Recommendations 1 and 2, CS7 SLO for amendment no.4, Tubber Lane North will read:

CS7 SLO5:

Development on RES-N zoned lands north of Tubber Lane shall comply with the following:

1. Development may not commence until Dart+ Southwest has commenced construction

2. Development may not commence until Tobermaclugg Park, a phasing requirement of the Adamstown SDZ Planning Scheme, has commenced construction.

3. An infrastructure masterplan shall be submitted to the planning authority as part of a planning application for residential development, addressing the water and wastewater network upgrades as necessary to serve the subject lands while demonstrating that the needs of zoned lands in the surrounding area, including Clonburris SDZ, are not compromised. To be agreed with Uisce Éireann in advance of submission of a planning application.

4. A masterplan for the lands, integrated with the existing parameters of the Adamstown SDZ Planning Scheme, shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of the submission of a planning application for residential development on the subject lands. Having regard to the cumulative development potential around and including the subject lands, the masterplan shall be informed by and address, inter alia:

a. Retention and enhancement of the north-south hedgerow as recorded on 1st Edition OS maps, unless required for wider movement needs,

b. Retain woodland as area of importance for wildlife and a key stepping stone in the wider ecological network; any interventions in or adjacent to the woodland should be informed by an EcIA and generally support the maintenance of such habitat as a refuge for wildlife,

- c. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife via sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance,**
- d. Ensure compliance with G13 (Riparian Corridors) in relation to any watercourses on site,**
- e. A Social Infrastructure Audit and provision within development proposals to address any needs identified, and to provide the planning framework to address social infrastructure and proactively engage with the relevant states agencies,**
- f. A Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and informed by options which can be demonstrated as being capable of being delivered as part of development, phased or otherwise, to provide access to high-capacity public transport as defined in the Sustainable Residential Development and Compact Settlement Guidelines,**
- g. A Public Open Space Audit to inform proposals for public open space and recreational facilities, having regard to environmental sensitivities and ensuring the provision of an appropriate balance of passive and active amenity in the public open space; and**
- h. Ensure adequate educational capacity for sites adjacent to Adamstown are catered for, in consultation with the Department of Education and Youth.**

MA5.1	
Amendment Ref. No. 5 Citywest (Book of Maps) Amendment Ref. No. 51 (Written Statement)	
County Development Plan Section(s)	Page(s)
Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town	73-74
To amend CS8 SLO2 in Variation No. 2, Amendment No. 5 Citywest as follows: CS8 SLO2: Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia: 1 a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, ECIAs to be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and any superseding guidance, b. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife through sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance, 2 c. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and 3 d. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane, e. A site-specific FRA addressing both the ornamental surface water features within the site and the un modelled watercourse to the south, f. An analysis of the existing water features to include for their incorporation as part of wider nature-based solutions to surface water management where feasible and appropriate, and g. Provision for a community centre / sports hall of approximately 1500sqm, or as agreed with the Planning Authority.	
Submission No.	

SD-C431-5 Cllr Francis Timmons SD-C431-66 Lisa A Lowry SD-C431-74 Gwen Maguire Maguire SD-C431-261 Stephen Little and Associates on behalf of Lydon SD-C431-333 Fiona Smyth		SD-C431-56 Saggart Community Council SD-C431-70 Amanda Higgins SD-C431-85 Siobhan Hennessy SD-C431-277 Office of Public Works SD-C431-497 Paul Gogarty	SD-C431-59 Kieran Mullen SD-C431-72 Harish Kumar Muttath Krishnan SD-C431-115 Anne Kavanagh SD-C431-278 Magdalena Zajac SD-C431-566 Saggart Village Residents' Association
Summary		CE Response	
Numerous submissions acknowledge the need for housing but highlight that the level of development needs to be supported by good infrastructure. A number of submissions also recognise the changes to CS8 SLO2 and consider these as improvements. Many submissions request to strengthen MA5.1 to align housing delivery with the timely provision of the necessary infrastructure and community facilities, while considering sustainable planning for both existing and future residents. A submission from Saggart Community Council (SCC) acknowledges the significant improvements introduced through the proposed Material Alterations, welcoming the inclusion of enhanced ecological protections, requirements for an Ecological Impact Assessment, ecologically informed lighting design, site-specific Flood Risk Assessment, consideration of existing water features, improved		Amendment No.5 of the proposed Variation No. 2 of the County Development Plan 2022-2028 proposed a zoning change from Open Space ('OS') to New Residential ('RES-N') to lands (c. 22ha) including the former golf course of the Citywest Hotel. The zoning was agreed at the Special Council meetings on the 19th and 24th of June 2026. However, it was resolved by the Elected Members to alter the wording of CS8 SLO2 which applied to the lands from the proposed Variation. These material alterations were published as MA5.1 Citywest and are shown in bold above. For clarity, the CE response is ordered to address the relevant individual points within MA5.1 and the overall CS8 SLO2, having regard to the submissions made on them. Environmental Impact – CS8 SLO2 Parts (a) and (b) The submissions in relation to woodland and hedgerows are noted. The previous use of part of the lands as a golf course incorporated hedgerows and vegetation as part of the overall layout. MA5.1 captures	

active travel connectivity and the proposed provision of a community centre/sports hall. These additions represent meaningful improvements to the original proposal. However, SCC state that there is an absence of strategic infrastructure safeguards that the Council has required for comparable strategic development sites elsewhere within the same Proposed Variation. SCC therefore requests that MA5.1 be amended to include equivalent safeguards (see General Comments).

A submission on behalf of the landowner / developer notes the material alterations to CS8 SLO2 and indicates they are generally supportive of the SLO and look forward to working in collaboration with SDCC to ensure the timely delivery of residential-led development.

Environmental Impact – CS8 SLO2 Parts (a) and (b)

Development on the lands would result in habitat destruction. The former golf course lands act as a critical green lung, carbon sink, and ecological corridor for Citywest. Decades of low intensity land use have allowed local wildlife and mobile species to establish vital habitats. Simply requiring an Ecological Impact Assessment (EcIA) and eco-sensitive lighting is inadequate to offset the permanent, irreversible destruction. This space should be preserved as an urban park or dedicated ecological zone.

the requirement for an Ecological Impact Assessment (EcIA). The site-specific EcIA, required in the MA to be undertaken by experienced and qualified ecologists and in accordance with professionally accepted CIEEM guidelines, will ensure that a professional ecological survey and assessment of the lands will inform the masterplan for the lands. The CIEEM Guidelines outline the principles and process which is relevant to developments that may impact on ecological features, a term used to cover habitats, species and ecosystems. It is considered that the inclusion of the requirement for an EcIA will therefore aid the inclusion of biodiversity measures, providing for existing local habitats and any wildlife corridors to be duly considered as part of proposed development. In addition, the green infrastructure policies within current County Development Plan provides a strong platform to ensure objectives are reflected as part of any future development on the lands.

MA5.1 also identifies that a masterplan should be informed by a lighting design that is directed by the ecological surveys to ensure potential impact on wildlife is minimised and carefully considered prior to any planning application at the subject lands. There is also a requirement for an analysis of the existing water features and their incorporation as nature-based solutions, where feasible and appropriate. Therefore, these safeguards would not be considered in isolation and would inform development design and layout.

The concerns raised regarding preserving the lands as an urban park or dedicated ecological zone are out of scope and do not relate to the changes set out in MA5.1 in light of the Special Council Meeting.

Flooding and Drainage Considerations - CS8 SLO2 Parts (e) and (f)

As part of the material alterations MA5.1, point 'e' has already put in place the need for a site-specific Flood Risk Assessment (FRA). The

A submission highlights that the wording of CS8 SLO2 should clarify that the EcIA must be undertaken before the masterplan is finalised. The EcIA should inform layout, retention of trees and hedgerows, protection of habitats, lighting strategy, drainage strategy, open space design, biodiversity enhancement and construction phasing. The Ecological Impact Assessment should be undertaken at masterplan stage and should inform the layout, open space strategy, lighting design, drainage strategy, habitat retention, biodiversity enhancement measures and phasing of development. The lighting design and implementation should be informed by ecological surveys and should seek to minimise impacts on wildlife. The lighting design should not be considered in isolation. There is a requirement to retain and protect significant woodland, mature trees, hedgerows, ecological corridors, water features and adequate buffers. Aerial plans demonstrate extensive mature landscape features and water bodies within and adjoining the lands. The Ecological Impact Assessment should require the retention and protection of significant woodland, mature trees, hedgerows, water features and ecological corridors wherever practicable, together with evidence-based buffers and construction protection zones. Any unavoidable loss should be demonstrably minimised and subject to meaningful, measurable and long-	FRA will be carried out in accordance with the <i>Planning System and Flood Risk Management Guidelines for Planning Authorities</i> (2009) and in line with the requirements set out by Policies IE3 and IE4 in the County Development Plan (2022-2028). The SFRA accompanying the Variation identified that the site is not situated within Flood Zone A or B and that no Justification Test is required. The submission from the OPW relating to the SFRA for the lands is dealt with under Environmental Assessments, Section 3.3 of this report. However, it is noted that the Planning Authority liaised with the design team of the Camac Flood Alleviation Scheme (FAS), as requested, and that based on their latest predicted flooding extents there are no predicted fluvial flooding issues on the site and that any surface water (pluvial) issues can be addressed through surface water management within the required masterplan and through the planning application process. CS8 SLO2 in point ‘f’ will further require analysis of the existing water features as part of their integration into a wider nature-based solution to surface water management, where it is feasible. The masterplanning and the planning application process will identify and incorporate further site specific Sustainable Urban Drainage Systems (SuDS) measures, as required to address surface water in a sustainable manner, by utilising natural infiltration processes from the environment, ensuring that the rate of water run-off is the same as the greenfield rate and safeguarding water quality. Policy IE3 of the County Development Plan sets out objectives to ensure developments manage surface water appropriately. While the comments on the Council letter of 30th July are noted, it is considered that there is strong policy direction and support for robust surface water measures in the SLO as
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term compensation only after avoidance and retention have been fully examined. Flooding and Drainage Considerations – CS8 SLO2 Parts (e) and (f) A site-specific Flood Risk Assessment should be prepared at masterplan stage and inform the layout, developable area, open space strategy, drainage design and phasing of the development. The assessment should address climate change, exceedance routes, downstream impacts and ensure that development does not increase flood risk on adjoining or downstream lands. The existing water features should be assessed for retention and integration into a site-wide blue-green infrastructure and SuDS strategy, with regards to biodiversity, amenity, water quality, flood risk, climate adaptation and long-term maintenance. A recent Council letter (dated 30th July 2026) demonstrates the practical consequences of incomplete and interdependent surface-water infrastructure in nearby estates. The taking in charge of nearby estates demonstrates the practical consequences of unresolved, interconnected surface-water infrastructure. The letter states that taking in charge cannot progress because surface-water services are tied into a neighbouring development and the connected drainage works remain incomplete. Therefore, residents and the	included in the material alteration and in existing policy and objectives in the County Development Plan. Community Centre/Sports Hall - CS8 Part (g) General support for the inclusion of the Community Centre (point g) within the SLO is welcomed. It is noted that Councillor Timmons originally put forward the following motion in relation to the subject lands: <i>That this Council supports the RES-N zoning at Citywest subject to the amendment of point g of CS8 SLO2 to read as follows: Integrate and deliver as part of housing development a Multi-Purpose Sports Facility (1,500sq m), a sports pitch and a local park with mixed play facilities for the community.</i> <i>Reason: to deliver much needed housing on fully serviced lands alongside needed local sporting and play facilities and local parks.</i> The wording of the Councillor’s submission was subject to a motion at the Special Council meetings in June this year as part of the proposed Variation. MA5.1 as published reflects the minutes of the meeting which were approved at the full Council Meeting in July 2026. The CE response to this motion identified that the delivery of public open space and mixed play facilities can be accommodated as part of residential development under the current policies in the County Development Plan. The delivery of a sports pitch on the lands would unduly reduce the remaining land available for housing and have a significant impact on the capacity of the planning authority to meet the targets set out in the NPF. However, the Council will continue to pursue alternative solutions to the delivery of a pitch in the area.
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Council can be left waiting where critical drainage works depend on another development. This demonstrates what can happen when essential infrastructure is incomplete or dependent on another development. Therefore, specific delivery outcomes and occupation triggers should be used. All necessary surface-water infrastructure, flood mitigation, outfalls, attenuation, nature-based drainage and connections should be fully secured and operational in accordance with an approved phasing plan.

The Office of Public Works notes the response included in the SFRA outlining culvert blockages at times of intense rainfall in response to their initial observation of an un-modelled watercourse to the south of the zoned area, which has a number of historic flood events associated with it. The OPW indicates that SDCC should liaise with the design team for the River Camac Flood Alleviation Scheme regarding the flood risk in the area.

Community Centre/Sports Hall - CS8 Part (g)

Councillor Timmon's submission supports the overall Amendment Ref. No. 5 Citywest but highlights that the agreed sports pitch and local park with play facilities for the community part of the previous motion is not included. CS8 SLO2 needs to be amended to include the following set out in the motion at the Special Council Meeting:

The current wording of CS8 SLO2 provides a mechanism to allow for the provision of a suitable community centre/sports hall as part of the masterplan process and in advance of the submission of a planning application. Furthermore, submissions can be made to the planning application itself offering an opportunity for further input from the public. It is considered that the wording of the SLO provides a sufficient framework in relation to the delivery of a community centre / sports hall on the lands, requiring its provision.

Strategic Environmental Assessment and Appropriate Assessment

The Chief Executive has responded to the observations on Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) in Section 3.3 of this report under Environmental Assessments.

General Comments

Some submissions raised issues or observations which are outside the scope of the current stage of the Variation process. At this material alteration (MA) stage, under section 58 of the Planning and Development Act, only matters relating to the specific material alterations can be considered and only minor modifications can be made should the material alteration be agreed by the elected members.

Where concerns / observations are out of scope they are summarised briefly in the Out of Scope Section 3.4 of this report.

That this Council supports the RES-N zoning at Citywest subject to the amendment of point g of CS8 SLO2 to read as follows: Integrate and deliver as part of housing development a Multi-Purpose Sports Facility (1,500sq m), a sports pitch and a local park with mixed play facilities for the community.

Reason: to deliver much needed housing on fully serviced lands alongside needed local sporting and play facilities and local parks.

A further submission also states that this motion was passed by the elected members but not published in the Material Alterations and is in support of including the additional sports, recreational and local park provisions.

A submission states that the current wording of part (g) of CS8 SLO2 relating to “or as agreed with the Planning Authority” could allow the facility to be reduced or altered without clear criteria. Provision should be made for a publicly accessible community centre/sports hall that is justified by a Social Infrastructure Audit and the facility should be delivered in tandem with any residential development and be operational prior to occupation of a defined proportion of dwellings, to be agreed through the Masterplan. Infrastructure that is not tied to clear delivery stages can be delayed until late in the development process.

Numerous submissions highlight that the current reference in the SLO to a community centre/sports hall is welcomed but is not a substitute for outdoor pitches, a pavilion or local park.

Strategic Environmental Assessment and Appropriate Assessment

Observations are raised in relation to the SEA and AA Assessment. It is submitted that the SEA screening reasoning should be clarified in respect of Citywest particularly regarding cumulative impacts on education, health care, community infrastructure, recreation, potable water, wastewater and transport. The need for the final AA Screening and final AA Screening Determination to address any final adopted amendments made to MA5.1 is also raised.

General Comments

A submission refers to SLO requirements set out in other lands associated with the proposed Variation No.2 and argues that similar provisions should be incorporated on the Citywest lands.

Submissions raise concerns relating to zoning, overdevelopment, education, health provision, childcare, utilities/services, transport, crime and heritage.

The projects set out in South Dublin County Council 3 Year Capital Programme 2025-2027 for the area

do not demonstrate that the infrastructure needs of the wider area have already been met. A submission stipulates that the SLO is framed with requirements to assess or consider impacts rather than requirements to secure outcomes. As such, there is a need for measurable outcomes, clear delivery stages and enforceable phasing triggers.	
CE Recommendation To make the Variation with the Material Amendment MA5.1 as follows: CS8 SLO2: Development on RES-N zoned lands on the former golf course of the Citywest Hotel shall be in accordance with a masterplan for the lands to be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia: a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, ECIAs to be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and any superseding guidance; b. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife through sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance; c. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact; d. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane; e. A site-specific FRA addressing both the ornamental surface water features within the site and the un modelled watercourse to the south; f. An analysis of the existing water features to include for their incorporation as part of wider nature-based solutions to surface water management where feasible and appropriate; and g. Provision for a community centre / sports hall of approximately 1500sqm, or as agreed with the Planning Authority.	

MA6.1

Amendment Ref. No. 6 St. Edmundsbury (Book of Maps)

To omit Amendment Ref. No. 6 (See Book of Maps)



Amendment Proposed



Variation as Published

Submission No.

[SD-C431-2 Cllr Francis Timmons](#)
[SD-C431-12 Julieann Byrne](#)
[SD-C431-15 Anna ODoherty](#)
[SD-C431-18 Dee Regan](#)
[SD-C431-21 Fiona Martin](#)
[SD-C431-24 Sally Martin](#)
[SD-C431-28 Maureen Dunne](#)
[SD-C431-31 Julie Edwards](#)
[SD-C431-36 Thomas Woods](#)
[SD-C431-39 Veron Tavey](#)

[SD-C431-8 Madeleine Johansson](#)
[SD-C431-13 Mary Borton Borton](#)
[SD-C431-16 James McCann](#)
[SD-C431-19 Martin McHugh](#)
[SD-C431-22 Sarah Barragry](#)
[SD-C431-25 Jason Monahan](#)
[SD-C431-29 Lawrence Dunne](#)
[SD-C431-34 Catherine Dardis](#)
[SD-C431-37 Breda Tuite](#)
[SD-C431-40 Mary Daniels](#)

[SD-C431-11 Kate Blanchfield](#)
[SD-C431-14 Niall Cosgrave](#)
[SD-C431-17 David O'Reilly](#)
[SD-C431-20 John Paul Tuohy](#)
[SD-C431-23 Ferdinand van Aesch](#)
[SD-C431-26 Graham Forde](#)
[SD-C431-30 Katherine Thomas](#)
[SD-C431-35 Jessica Molloy](#)
[SD-C431-38 Anne Murray](#)
[SD-C431-41 Elaine McConnell](#)

[SD-C431-42 Patrick Kenna](#)
[SD-C431-45 Seán Heffernan](#)
[SD-C431-48 Rupert Fuller](#)
[SD-C431-51 Kevin Fitzgerald](#)
[SD-C431-55 Orla Cunningham](#)
[SD-C431-60 Melissa Quinn](#)
[SD-C431-64 Cait Cunningham](#)
[SD-C431-68 Davina Monahan](#)
[SD-C431-73 Jennifer Tierney](#)
[SD-C431-77 Don Dillon](#)
[SD-C431-80 sarah tavey](#)
[SD-C431-83 Ian Smallman](#)
[SD-C431-87 AMIT AHUJA](#)
[SD-C431-90 AMIT AHUJA](#)
[SD-C431-93 Kate Taylor](#)
[SD-C431-96 Philip Tavey](#)
[SD-C431-104 Local Resident](#)
[SD-C431-108 Nic Gilchrist](#)
[SD-C431-111 Anna Chrysovergi](#)
[SD-C431-114 Colin Bond](#)
[SD-C431-118 Hollie Smith](#)
[SD-C431-122 Nicola Henry](#)
[SD-C431-125 Malachy Tuohy](#)
[SD-C431-129 Gerry McAndrew](#)
[SD-C431-132 Sophie Dennehy](#)
[SD-C431-136 Eileen Dennehy](#)
[SD-C431-139 Owen Dunne](#)
[SD-C431-144 Patricia Graham](#)
[SD-C431-148 Michelle Swords Whelan](#)
[SD-C431-151 Kevin Nolan](#)
[SD-C431-154 Sheena Bolger](#)

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[SD-C431-46 Geraldine Lavin](#)
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[SD-C431-57 Kathleen Thomas](#)
[SD-C431-61 Patricia F](#)
[SD-C431-65 Ciaran Peavoy](#)
[SD-C431-69 Esther Monahan](#)
[SD-C431-75 Lorna Carroll](#)
[SD-C431-78 Rachel Cunningham](#)
[SD-C431-81 Janet Nichol](#)
[SD-C431-84 William Lavelle](#)
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[SD-C431-99 Sarah McDermott](#)
[SD-C431-105 Michael Heffernan](#)
[SD-C431-109 Liz Pratt](#)
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[SD-C431-120 Maureen Lynch](#)
[SD-C431-123 Anne Heffernan](#)
[SD-C431-126 Suzanne Delargy](#)
[SD-C431-130 Fiona O'Brien](#)
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[SD-C431-149 James Mc Donald](#)
[SD-C431-152 John O Donnell](#)
[SD-C431-155 Robert Mc Cabe](#)

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[SD-C431-54 Katriona Power](#)
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[SD-C431-62 Rose Murray](#)
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[SD-C431-71 Pamela Stagg](#)
[SD-C431-76 David Carroll](#)
[SD-C431-79 Kayleigh Fox](#)
[SD-C431-82 Róise Tavey](#)
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[SD-C431-95 Aidan Brennan](#)
[SD-C431-102 Ciaran Henry](#)
[SD-C431-107 Frank Hynes](#)
[SD-C431-110 Joe O' Rourke](#)
[SD-C431-113 Clive Dardis](#)
[SD-C431-117 Caroline O'Brien](#)
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[SD-C431-124 Kate Henry](#)
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[SD-C431-131 Rita Nolan](#)
[SD-C431-135 Shane Nestor](#)
[SD-C431-138 Anita Cahill](#)
[SD-C431-143 F O'Brien](#)
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[SD-C431-157 Michael Murphy](#)

[SD-C431-165 John Coleman](#)

[SD-C431-169 Kim McCrave](#)

[SD-C431-172 Sarah Argue](#)

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[SD-C431-224 Little Folk Preschool](#)

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[SD-C431-236 Joanna Byrne](#)

[SD-C431-239 Ronan N](#)

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[SD-C431-246 David McCartney](#)

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[SD-C431-255 Eimear Scully](#)

[SD-C431-264 Sinead Clarke](#)

[SD-C431-269 Sebastian Fruend](#)

[SD-C431-274 Paul Casey](#)

[SD-C431-289 Sandra Callaghan
Callaghan](#)

[SD-C431-158 Sophie Henry](#)

[SD-C431-167 John roche](#)

[SD-C431-170 Nicky Weir](#)

[SD-C431-173 Mary Argue](#)

[SD-C431-177 Mirna Salamon](#)

[SD-C431-180 Karl McGovern](#)

[SD-C431-182 Sean Giblin](#)

[SD-C431-188 Heather Hallinan](#)

[SD-C431-197 Celine Kiernan](#)

[SD-C431-200 Sara Kelly](#)

[SD-C431-205 Pauline McCormack
McCormack](#)

[SD-C431-210 Tom Farrell](#)

[SD-C431-214 Galina Gamija Gamija](#)

[SD-C431-217 Tom O'Hare](#)

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[SD-C431-240 Fidelma Curran](#)

[SD-C431-243 Alan O'Neill](#)

[SD-C431-247 Ronan Gallagher](#)

[SD-C431-254 Liffey Salmon Project](#)

[SD-C431-256 Seán Ó Rudaí](#)

[SD-C431-265 Marie Manders](#)

[SD-C431-271 Veron Tavey](#)

[SD-C431-275 James Walker](#)

[SD-C431-292 Edward Thomas](#)

[SD-C431-161 National Transport
Authority](#)

[SD-C431-168 Roy Lynch](#)

[SD-C431-171 Jack O'Sullivan](#)

[SD-C431-174 Thomas Doolan](#)

[SD-C431-178 MICHAEL MC GRATH](#)

[SD-C431-180 Karl McGovern](#)

[SD-C431-183 Bryan Murphy](#)

[SD-C431-189 Aidan Mills](#)

[SD-C431-198 Majella Mckeon](#)

[SD-C431-201 Paul&Linda
McKenna](#)

[SD-C431-206 Lilian Harris](#)

[SD-C431-211 Lucan Tidy Towns](#)

[SD-C431-215 Carmel Griffin](#)

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[SD-C431-230 Conal Cassidy](#)

[SD-C431-234 Jennifer Begley](#)

[SD-C431-238 Sandra M](#)

[SD-C431-241 E.M Hurley](#)

[SD-C431-244 Áine Byrne](#)

[SD-C431-248 Gráinne Nic Chárthaigh](#)

[SD-C431-254 Liffey Salmon Project](#)

[SD-C431-262 Michael Malone](#)

[SD-C431-267 Áine Gallagher](#)

[SD-C431-272 Rachel Tuohy Tuohy](#)

[SD-C431-282 Shauna Murphy-Farrell](#)

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[SD-C431-297 Susan Phelan](#)
[SD-C431-309 Lisa Flanagan Flanagan](#)
[SD-C431-314 Alan Tolan](#)
[SD-C431-319 Suzanne Andrews](#)
[SD-C431-322 Beata Tuohy Tuohy](#)
[SD-C431-325 Cristina Torres](#)
[SD-C431-334 Daniel McCartney](#)
[SD-C431-342 Sarah Smith](#)
[SD-C431-354 Ciara Dardis](#)
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[SD-C431-366 John O'Brien](#)
[SD-C431-373 Terence Hynes](#)
[SD-C431-376 Jean Mc Carthy](#)
[SD-C431-393 Mary Porter](#)
[SD-C431-405 Marissa Britton](#)
[SD-C431-414 Stephen McCormack](#)
[SD-C431-424 Oran Fitton](#)
[SD-C431-447 Cllr. Helen Farrell](#)
[SD-C431-452 Claire Joyce](#)
[SD-C431-463 Paula McMahon](#)

[SD-C431-481 Power & Smullen
Wine Merchants Ltd](#)
[SD-C431-486 Karla Doran](#)

[SD-C431-491 Colm Kelly](#)
[SD-C431-498 O'Flynn Group](#)
[SD-C431-501 LIONA O'TOOLE](#)
[SD-C431-504 Blathnaid Phelan](#)
[SD-C431-512 Sue Quinn](#)

[SD-C431-300 Elizabeth Quinn](#)
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[SD-C431-316 Seán Hughes](#)
[SD-C431-320 justin byrne](#)
[SD-C431-323 Dermot Keogh](#)
[SD-C431-328 Morgan Polockus](#)
[SD-C431-337 Andrea Waide](#)
[SD-C431-344 Roberta McCarthy](#)
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[SD-C431-359 Tessa Curran](#)
[SD-C431-364 Brigetta Connolly](#)
[SD-C431-367 Hermitage Park](#)
[SD-C431-374 Johanne Monahan](#)
[SD-C431-389 Andrew Finn](#)
[SD-C431-397 Alan Quinn](#)
[SD-C431-411 Ray Hearne](#)
[SD-C431-415 Sinead Fitton](#)
[SD-C431-425 Derry Fitzgerald](#)
[SD-C431-450 Claire Joyce](#)
[SD-C431-458 Sinead Smyth](#)
[SD-C431-473 Miriam Leonard](#)

[SD-C431-482 Cllr Vicki Casserly](#)

[SD-C431-488 Office of the Planning
Regulator](#)
[SD-C431-495 Mary Teresa Brien](#)
[SD-C431-499 Seamus Small](#)
[SD-C431-502 Brid Fahey](#)
[SD-C431-505 Hannah Dyas](#)
[SD-C431-514 Sue Quinn](#)

[SD-C431-305 Caoimhe Farrell](#)
[SD-C431-311 David Thomas](#)
[SD-C431-318 Barry Shone](#)
[SD-C431-321 Peter Thomas](#)
[SD-C431-324 Bláthnaid O'Dwyer](#)
[SD-C431-329 Liam Russell](#)
[SD-C431-341 Denis Twohig](#)
[SD-C431-353 Brian Carroll](#)
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[SD-C431-360 Donal Curran](#)
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[SD-C431-368 John O'Connor](#)
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[SD-C431-417 Grace Byrne Byrne](#)
[SD-C431-438 Kawsar islam](#)
[SD-C431-451 Diane Grogan](#)
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[SD-C431-515 Lesley Jenkins](#)

[SD-C431-516 Tom Tuohy](#)
[SD-C431-531 Maria Murphy](#)
[SD-C431-539 Renee Flynn](#)
[SD-C431-549 James Delaney](#)
[SD-C431-554 Ballydowd Residents' Association](#)
[SD-C431-556 Ballydowd Residents' Association](#)
[SD-C431-560 Ballydowd Residents' Association](#)
[SD-C431-563 Caroline Carney](#)
[SD-C431-569 Sinéad Farrell](#)

[SD-C431-574 South Dublin Conservation Society](#)
[SD-C431-579 Adam Mc Manus](#)
[SD-C431-582 Ann Mc Grath Philip Mc Grath](#)
[SD-C431-585 Ava Murphy](#)
[SD-C431-588 Adrienne Jordan](#)
[SD-C431-591 Caoimhe Lee](#)
[SD-C431-594 Aideen Carmody](#)
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[SD-C431-606 Ger O Connor](#)
[SD-C431-609 Grainne Davin](#)
[SD-C431-612 Hannah Brady](#)
[SD-C431-615 Jeff Keogh](#)
[SD-C431-618 Kevin Zeltner](#)
[SD-C431-621 Lauren Gobbett](#)

[SD-C431-517 Rosemary Charlton](#)
[SD-C431-534 Cyclist](#)
[SD-C431-543 Maria Guerriero](#)
[SD-C431-551 Ciara McCloskey](#)
[SD-C431-554 Ballydowd Residents' Association](#)
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[SD-C431-564 Derek Porter](#)
[SD-C431-570 Senan Farrell](#)

[SD-C431-577 Adrienne Doherty](#)

[SD-C431-580 Aisling Woulfe Lennon](#)
[SD-C431-583 Anne Marie Brady](#)

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[SD-C431-589 Bridget Phillips](#)
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[SD-C431-604 Gavin Farley](#)
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[SD-C431-616 Jerry Povell](#)
[SD-C431-619 John Donnelly](#)
[SD-C431-622 Leah Dunne](#)

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[SD-C431-562 Luke Heffernan](#)

[SD-C431-565 Miriam Whittle](#)
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[SD-C431-581 Alan Bell](#)
[SD-C431-584 Anthony Mc Mahon](#)

[SD-C431-587 Brendan Lennon](#)
[SD-C431-590 Bryan F](#)
[SD-C431-593 Conor Donnelly](#)
[SD-C431-596 D Whelan](#)
[SD-C431-599 Denis Cronin](#)
[SD-C431-602 Don Harrington](#)
[SD-C431-605 Genevieve Hennessy](#)
[SD-C431-608 Gerard Kelly Anderson](#)
[SD-C431-611 H Malone](#)
[SD-C431-614 James A Murphy](#)
[SD-C431-617 John Donnelly](#)
[SD-C431-620 Aileen Slattery](#)
[SD-C431-623 Lisa Hosback](#)

[SD-C431-624 Maire Whelan](#)
[SD-C431-627 Mary Martin](#)
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[SD-C431-633 Michael May](#)
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[SD-C431-702 Colin Murphy](#)
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[SD-C431-711 G Illegible](#)

[SD-C431-625 Mark Maher](#)
[SD-C431-628 Mary Murphy](#)
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[SD-C431-634 N D](#)
[SD-C431-637 Neasa O Rourke](#)
[SD-C431-640 Alicia Carroll](#)
[SD-C431-643 Anika Nagel](#)
[SD-C431-646 Anna O' Connor](#)
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[SD-C431-676 Christopher Berbig](#)
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[SD-C431-694 Sandra Walsh](#)
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[SD-C431-626 Aine Breen](#)
[SD-C431-629 Mary Whittle](#)
[SD-C431-632 Aine Mc Kinley](#)
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[SD-C431-653 Aoife Breen](#)
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[SD-C431-707 Clara O'Connor](#)
[SD-C431-710 Dara Donoghue](#)
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<u>SD-C431-717 David Keenen</u>	<u>SD-C431-718 Leo Corry</u>	<u>SD-C431-719 Maeve Colley</u>
<u>SD-C431-720 Maria Fitzpatrick</u>	<u>SD-C431-721 Martin Sidds</u>	<u>SD-C431-722 illegible Illegible</u>
<u>SD-C431-723 Ryan Daggins</u>	<u>SD-C431-724 S Sam</u>	<u>SD-C431-725 S Sharpe</u>
<u>SD-C431-726 Sandra Long</u>	<u>SD-C431-727 Siobhan Walsh</u>	<u>SD-C431-728 Davy Vaneelvelde</u>
<u>SD-C431-729 Taidgh Redmond</u>	<u>SD-C431-730 Debbi G Murphy</u>	<u>SD-C431-731 Declan Doherty</u>
<u>SD-C431-732 Declan Dunne</u>	<u>SD-C431-733 Deirdre Byrne</u>	<u>SD-C431-734 Deirdre O Toole</u>
<u>SD-C431-735 Deirdre Breen</u>	<u>SD-C431-736 Diane Richmond</u>	<u>SD-C431-737 Abi Boyle</u>
<u>SD-C431-738 Abigail Mc Sweeney</u>	<u>SD-C431-739 Adam Devitt</u>	<u>SD-C431-740 Ailish O Grady</u>
<u>SD-C431-741 Aisling Mc Cormack</u>	<u>SD-C431-742 Alan Henney</u>	<u>SD-C431-743 Alicia Mc Sweeney</u>
<u>SD-C431-744 Ali Dunne</u>	<u>SD-C431-745 Amie Morrine</u>	<u>SD-C431-746 Donal Joseph Begley</u>
<u>SD-C431-747 Amy Singleton</u>	<u>SD-C431-748 Ann Hayes</u>	<u>SD-C431-749 Ann O Connor</u>
<u>SD-C431-750 Ann Byrne</u>	<u>SD-C431-751 Anne O Sullivan</u>	<u>SD-C431-752 Anthony Norton</u>
<u>SD-C431-753 Dorothea Keane</u>	<u>SD-C431-754 E Boyle</u>	<u>SD-C431-755 Eamon Byrne</u>
<u>SD-C431-756 Antonio Garcia Lopez</u>	<u>SD-C431-757 Aoibhinn Gallagher</u>	<u>SD-C431-758 Ashley Dowling</u>
<u>SD-C431-759 Audrey Bradley</u>	<u>SD-C431-760 Billy G</u>	<u>SD-C431-761 Brian Doyle</u>
<u>SD-C431-762 Briege Rutledge</u>	<u>SD-C431-763 Carmel Lyons</u>	<u>SD-C431-764 Caroline Gallagher</u>
<u>SD-C431-765 Caroline Hogarty</u>	<u>SD-C431-766 Christina O Grady</u>	<u>SD-C431-767 Christopher Foran</u>
<u>SD-C431-768 Cian Mulread</u>	<u>SD-C431-769 Ciara Gallagher</u>	<u>SD-C431-770 Cora Kelly</u>
<u>SD-C431-771 Danny Mc Sweeney</u>	<u>SD-C431-772 David Mc Cartney</u>	<u>SD-C431-773 Denis Field Marcella Field</u>
<u>SD-C431-774 Derek Cahill</u>	<u>SD-C431-775 Diarmuid Dawson</u>	<u>SD-C431-776 Dolores Duin</u>
<u>SD-C431-777 Ebdelsalaam Kalee</u>	<u>SD-C431-778 Edward Duffy</u>	<u>SD-C431-779 Eileen White</u>
<u>SD-C431-780 Elizabeth Allen</u>	<u>SD-C431-781 Ella Boyle</u>	<u>SD-C431-782 Ella Dawson</u>
<u>SD-C431-783 Eve Doyle</u>	<u>SD-C431-784 F Deasy</u>	<u>SD-C431-785 Felix Adgelu</u>
<u>SD-C431-786 Frances Norton</u>	<u>SD-C431-787 Frances Sullivan</u>	<u>SD-C431-788 Frank D'Arcy</u>
<u>SD-C431-789 Gail Quinn</u>	<u>SD-C431-790 Ger Mc Mahon Peppi Mc Mahon</u>	<u>SD-C431-791 Gillian O Brien</u>
<u>SD-C431-792 Grainne Nolan</u>	<u>SD-C431-793 Heather Celmalis</u>	<u>SD-C431-794 Helen Stairs</u>
<u>SD-C431-795 Henry Keogh</u>	<u>SD-C431-796 Mary Casey</u>	<u>SD-C431-797 I Callaghan</u>
<u>SD-C431-798 Irene Mc Sweeney</u>	<u>SD-C431-799 Jake Rooney</u>	<u>SD-C431-800 Jean Regan</u>
<u>SD-C431-801 Jeff B</u>	<u>SD-C431-802 Jessica Finn</u>	<u>SD-C431-803 Jim Hand</u>

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[SD-C431-807 John Gobbett](#)
[SD-C431-810 Josephine Farrelly](#)
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[SD-C431-819 Edel Mooney](#)
[SD-C431-822 Laura Illegible](#)
[SD-C431-825 Eileen Kearns](#)
[SD-C431-828 Eileen Sheahan](#)

[SD-C431-831 Eileen Worrall](#)
[SD-C431-834 Louise Ronan](#)
[SD-C431-837 Elizabeth Boland](#)
[SD-C431-840 Emer Cartwright](#)
[SD-C431-843 Mark Hughes](#)
[SD-C431-846 Emma Stackpool](#)
[SD-C431-849 Mary Dawson](#)
[SD-C431-852 Maryann Ryan](#)
[SD-C431-855 Maureen Young](#)
[SD-C431-858 Michelle O'Neill](#)
[SD-C431-861 Nicola Jordan](#)
[SD-C431-864 Orla Mc Carthy](#)
[SD-C431-867 Paul Manley](#)
[SD-C431-870 Regina Mc manus](#)
[SD-C431-873 Robert Lyons](#)
[SD-C431-876 Roisin Zeltner](#)
[SD-C431-879 Eric Ganger](#)
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[SD-C431-885 Esther Mc Govern](#)
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<u>SD-C431-1164 Una Duke</u>	<u>SD-C431-1165 illegible</u>	<u>SD-C431-1166 Virginia O Hehir</u>
<u>SD-C431-1167 W Gately</u>	<u>SD-C431-1168 W H</u>	<u>SD-C431-1169 illegible</u>
<u>SD-C431-1170 Agnes Garvey</u>	<u>SD-C431-1171 Aoife Daffy</u>	<u>SD-C431-1172 Bernice O Reilly</u>
<u>SD-C431-1173 Brian Fitzpatrick</u>	<u>SD-C431-1174 Caroline Ware</u>	<u>SD-C431-1175 Charlotte O Neill</u>
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<u>SD-C431-1179 David Porter</u>	<u>SD-C431-1180 S Doyle</u>	<u>SD-C431-1181 Ed Longworth</u>
<u>SD-C431-1182 Eileen Mc Crory</u>	<u>SD-C431-1183 illegible</u>	<u>SD-C431-1184 Elena D Alba</u>
<u>SD-C431-1185 Emily Mc Mahon</u>	<u>SD-C431-1186 Emily O Neill</u>	<u>SD-C431-1187 illegible</u>
<u>SD-C431-1188 Fiona Croke</u>	<u>SD-C431-1189 illegible</u>	<u>SD-C431-1190 Francis Farey</u>
<u>SD-C431-1191 Helen Trench James Trench</u>	<u>SD-C431-1192 Helen O Connor</u>	<u>SD-C431-1193 Imelda Higgins</u>
<u>SD-C431-1194 Inez Cooper</u>	<u>SD-C431-1195 Jackie Pollard</u>	<u>SD-C431-1196 Jacqui Molloy</u>
<u>SD-C431-1197 James McGreevy</u>	<u>SD-C431-1198 Jeanne Spain</u>	<u>SD-C431-1199 John G</u>
<u>SD-C431-1200 John Kearns</u>	<u>SD-C431-1201 John Mc Crory</u>	<u>SD-C431-1202 Josephine Reilly</u>
<u>SD-C431-1203 Judy Lawlor</u>	<u>SD-C431-1204 Kate Mc Mahon</u>	<u>SD-C431-1205 L Kilroy</u>
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<u>SD-C431-1209 Maire o Reilly</u>	<u>SD-C431-1210 Mary Allis</u>	<u>SD-C431-1211 Maura Mc Grath</u>
<u>SD-C431-1212 Max D Alba</u>	<u>SD-C431-1213 illegible</u>	<u>SD-C431-1214 Paddy Keating</u>
<u>SD-C431-1215 Paul Ulruinidh</u>	<u>SD-C431-1216 Pio Larley</u>	<u>SD-C431-1217 Liam Kirk</u>
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<u>SD-C431-1233 Noel Noonan</u>	<u>SD-C431-1234 Nora Sweetnam</u>	<u>SD-C431-1235 Ann Condon</u>
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[SD-C431-1464 Avril Nason](#)
[SD-C431-1478 Bernadette Clancy](#)

[SD-C431-1535 Bernard Dabatos](#)
[SD-C431-1538 Brid o Toole](#)
[SD-C431-1544 Carol Doolan](#)
[SD-C431-1559 Catherine Kinslla](#)
[SD-C431-1562 Donal Kennedy](#)
[SD-C431-1565 Ciara Colohan](#)
[SD-C431-1568 Clodagh Donoghue](#)
[SD-C431-1571 Conor Walsh](#)
[SD-C431-1574 Daithi O' Murchu](#)
[SD-C431-1577 Vivienne Mc Hugh](#)
[SD-C431-1580 Daniel Mc Carthey](#)
[SD-C431-1583 Thomas Conway](#)
[SD-C431-1586 Siobhan Sheridan](#)
[SD-C431-1589 Sinead Sheils](#)
[SD-C431-1592 Simon Condon](#)
[SD-C431-1595 Shauna Smith](#)
[SD-C431-1598 Sally Darlington](#)

[SD-C431-1375 Susan Quinn](#)
[SD-C431-1381 Tina Dunne](#)
[SD-C431-1390 Ultan Tuite](#)
[SD-C431-1398 Vipul Bhatia](#)
[SD-C431-1404 Vladislava Jupatova](#)
[SD-C431-1421 Ann Byrne](#)
[SD-C431-1429 Agnes Mc Mahon](#)
[SD-C431-1437 Alan Lynch](#)
[SD-C431-1440 Alex O Shea](#)
[SD-C431-1443 Ann Colohan](#)
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[SD-C431-1484 Bernard and Yvonne O' Sullivan](#)

[SD-C431-1536 Breda Baolin](#)
[SD-C431-1539 Brigid Mc Evoy](#)
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[SD-C431-1560 Amanda Roche](#)
[SD-C431-1563 Daniel Roche Kennedy](#)
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[SD-C431-1593 David Griffin](#)
[SD-C431-1596 Sean Feeney](#)
[SD-C431-1599 Ross Dabatos](#)

[SD-C431-1376 Terese Moran](#)
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[SD-C431-1573 D Merhut](#)
[SD-C431-1576 Wayne Withers](#)
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[SD-C431-1591 Sinead Keane Finnegan](#)
[SD-C431-1594 Sheila King](#)
[SD-C431-1597 David Henry](#)
[SD-C431-1600 Rosetta Finnegan](#)

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[SD-C431-1607 Debbie Leamy](#)
[SD-C431-1610 Rita Hatton](#)
[SD-C431-1613 Raymund Egan](#)
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[SD-C431-1619 Patrick Walsh](#)
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[SD-C431-1605 Robyn Stanley](#)
[SD-C431-1608 Robert Nichol](#)
[SD-C431-1611 Richard Feeney](#)
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[SD-C431-1617 Phil Callaghan](#)
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[SD-C431-1650 Mary Rudden](#)
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[SD-C431-1633 Emer Dunne](#)
[SD-C431-1636 Nicky Smith](#)
[SD-C431-1639 Emur Sonat Erdem](#)
[SD-C431-1642 Finbar O'Gorman](#)
[SD-C431-1645 Maura o Keeffe](#)
[SD-C431-1648 Mary Francis Long](#)
[SD-C431-1651 Mary Kennedy](#)
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Summary		CE Response
The majority of submissions support the continued protection of the lands at St. Edmundsbury and the removal of same from the proposed variation of the SDCC CDP 2022-2028. The following are a summary of the reasons raised in support of the removal of the lands from the variation: Zoning A dominant theme across the submissions was strong support for the retention of the existing High Amenity (HA) zoning at St. Edmundsbury and opposition to any residential rezoning, further noting that there is a higher proportion of development in the wider Lucan area. Submitters considered the site an irreplaceable environmental, recreational and landscape asset whose value extends beyond its immediate locality, including an observation that brownfield lands, vacant sites and derelict buildings should be prioritised, with development occurring at appropriate densities. Many supported the decision of elected members to reject rezoning proposals and		Material Alteration MA6.1 proposes ‘to omit Amendment Ref No.6 St. Edmundsbury. Amendment No. 6 St. Edmundsbury proposed a change of zoning of c. 14.98 hectares from: High Amenity - Liffey Valley (HA-LV) - <i>To protect and enhance the outstanding character and amenity of the Liffey Valley</i> To ‘RES’ ‘<i>To protect/or improve residential amenity</i>’. The proposed rezoning was accompanied by a Specific Local Objective CS7 SLO2 which stated: <i>Development on RES-N zoned lands at St. Edmundsbury, Lucan Road shall comply with the following:</i> <i>1. The development of a park within the Liffey Valley (zoning objective HA-LV) with enhanced recreational amenity and accessibility of the area while protecting the valley’s biodiversity and enhancing the green infrastructure network shall be provided for in tandem with, or prior to, residential development of the adjoining Res-N zoned lands. The park</i>

requested that the High Amenity designation not only be retained but strengthened and protected from future development pressures. It was argued that the purpose of High Amenity zoning is to safeguard sensitive landscapes and environmental assets and that the loss of these lands to development would result in permanent and irreversible impacts on their character and function.

Biodiversity Protection, Green Infrastructure and Ecological Connectivity

The ecological importance of St. Edmundsbury was one of the most frequently cited concerns. Submitters described the lands as a significant biodiversity resource supporting woodland, hedgerows, grassland habitats, pollinator networks and a wide range of wildlife species. The site was identified as an important component of the wider Liffey Valley ecological corridor and green infrastructure network, facilitating ecological connectivity across the area.

Many submissions highlighted concerns that development would fragment habitats, sever wildlife corridors and contribute to biodiversity loss. Reference was made to the presence of protected wildlife, including birds of conservation concern such as barn owl, yellowhammer, swift, redwing and other species indicated as being recorded within the area. Submitters argued that established ecological systems cannot be adequately recreated through

shall include lands within the HA-LV zoning objective to the north and west of the Res-N zoned lands extending to the River Liffey, including to the north and west of St. Patrick's Hospital grounds, and including connections westwards to Lucan Village and Chapel Hill. A detailed proposal to achieve this shall be agreed with the planning authority in advance of submission of a planning application for residential development on the Res-N zoned lands.

2. A masterplan for the lands shall be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia:

- a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species,*
- b. Retention and enhancement of the east-west hedgerow and tree line in the north of the site as recorded on 1st Edition OS maps,*
- c. A Local landscape and historical character assessment,*
- d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and*
- e. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structures and their curtilage.*

Variation Context and Process

For South Dublin County Council, the revised annual target arising from the NPF First Revision (April 2025) is 3,270 units, up from the 2,596 in the core strategy of the adopted County Development Plan. The NPF Implementation Guidelines required Councils to identify the lands needed for delivery of the new targets within the Development Plan

mitigation measures or replacement planting and that protection of existing habitats should be prioritised over attempts to restore biodiversity after development has occurred.

Climate Action and Environment

Numerous submissions highlighted the contribution of St. Edmundsbury to climate resilience and environmental sustainability. The lands were recognised as providing valuable ecosystem services including carbon sequestration, natural drainage, flood attenuation, urban cooling and air quality improvement. Many contributors considered the site to be an important nature-based solution that supports local and national climate objectives.

It was argued that retaining the lands would assist in addressing the climate emergency by safeguarding green infrastructure that contributes to environmental resilience. Concerns were raised that development would diminish the area's ability to provide these environmental functions and would undermine efforts to transition towards a more climate-resilient society. Several submissions further noted the importance of protecting natural capital and recognised the role of green spaces in helping communities adapt to climate change.

Landscape Character and Visual Amenity

Submitters repeatedly emphasised the contribution of St. Edmundsbury to the landscape character of

period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The audit of the capacity of the zoned lands in the adopted CDP was presented to the Elected Members at the October 2025 Council Meeting in the form of a Report to the Elected Members, as required by the Guidelines. This report, based on a Settlement Capacity Audit (SCA), indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county is 11,699, resulting in an identified shortfall of lands to accommodate 2,086 units.

Based on the understanding of need, the Council progressed to the identification of preferred lands using the criteria from the initial SCA on zoned lands, including brownfield lands, lands within neighbourhood and town centres, and other key sites, as well as further criteria to ensure that any potential rezoning would be consistent with the achievement of the shared goals in the NPF, RSES and County Development Plan in relation to compact growth, accessibility, sustainable mobility and climate action. The Council utilised the Compact Settlement Guidelines to apply the relevant and appropriate density ranges to the lands in question based on criteria set out in the guidelines. Following the full review process Variation No. 2 identified lands to increase the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares of land which included for 45% additional capacity.

Alongside the identified capacity of existing zoned land of 9,613 units (160ha) the lands proposed for rezoning were considered sufficient to meet the revised targets up to 2028 with the potential to continue to deliver up to 2030. Given the approach taken to the Variation, it is

Lucan and the wider Liffey Valley. The lands were described as an attractive open landscape that provides important visual relief within an increasingly urbanised environment. Particular reference was made to mature trees, hedgerows, woodland areas, open fields and scenic views that contribute to the area's unique character.

Many concerns focused on the potential loss of visual amenity and degradation of landscape quality should development occur. It was considered that residential development would alter the integrity of the landscape, erode its natural beauty and diminish its role as a buffer to the adjoining Liffey Valley Special Amenity Area. The protection of the site's visual and landscape qualities was consistently identified as a key planning consideration.

Natural Heritage and Historic Environment

The site was frequently described as an important heritage asset with strong links to the cultural and historic development of Lucan and the Liffey Valley. Submitters highlighted the historic demesne landscape, mature woodland setting, relationship with the River Liffey and connections to heritage features such as Shackleton Mills and protected structures.

Many submissions stated that the heritage significance of St. Edmundsbury contributes substantially to local identity and sense of continuity

considered that the settlement capacity study undertaken identified lands which have been carefully evaluated through a criteria-based approach to best meet the housing shortfall for 2028 with built-in additional capacity, noting that the Planning and Development (Amendment) Act 2026 facilitates the extension of the County Development Plan to August 2030.

Proposed Material Alteration to Omit Zoning

It is recognised that the majority of submissions support the omission of the rezoning at St. Edmundsbury for a variety of reasons, many of them raised at the draft Variation stage, and while responded to at that stage they are further responded to below. The extent of public concern regarding the lands is acknowledged. However, the Planning Authority must consider those concerns alongside the obligations arising from the revised National Planning Framework, the revised housing targets, the evidence-based land assessment process and the views of statutory agencies.

The omission of these lands from the Variation will undermine the ability of the Planning Authority to support the delivery of the housing targets set by the Revised National Planning Framework. The lands represent an important component of the need identified for the County's housing land supply and contribute towards addressing the identified housing shortfall of approximately 2,086 dwellings to 2028 and up to 2030, required to meet the revised housing targets arising from the National Planning Framework and Housing Growth Requirements Guidelines. The lands align with the criteria for sustainable and compact development with the NTA indicating that the lands at St. Edmundsbury are served by a variety of radial and orbital services and are a highly suitable location for residential development due to the strong accessibility by existing public transport services and

with the area's past. The loss of these lands to development was considered by many to represent a permanent erosion of both natural and cultural heritage that could not be recreated in the future. A submission also highlighted the importance of setting goals in line with the EU Nature Restoration Law.

Sense of Place and Local Identity, Health and Wellbeing

A recurring theme throughout the submissions was the role of St. Edmundsbury in supporting community wellbeing, quality of life and local identity. The area was described as a valued green space where residents can walk, exercise, observe wildlife and connect with nature. Many contributors highlighted its importance for physical and mental health, particularly in an increasingly developed urban environment.

Submitters referred to the site's tranquillity, natural beauty and contribution to a strong sense of place within Lucan.

Submissions also noted that it serves as one of the few remaining natural landscapes within the locality and acts as a "green lung" providing respite from traffic, development and urban pressures. The educational value of the area was also referenced, with some submissions highlighting opportunities for

the ability to support compact growth within the existing built-up area. They have also indicated that the lands are located within a wider area that is served and will be significantly enhanced by strategic public transport investment, including:

- BusConnects Core Bus Corridors (Lucan and Liffey Valley);
- DART+ SouthWest, for which a Railway Order was approved in November 2024, and which remains a key national infrastructure project;
- the future Luas Lucan scheme; and
- wider investment under the Greater Dublin Area Transport Strategy 2022–2042.

The lands are also proximate to local facilities and services including schools, shops, medical facilities, parks and recreation within and around Lucan Village.

The proposed Amendment at St. Edmundsbury in the draft Variation was supported by a comprehensive Specific Local Objective, providing mechanisms to address many of the concerns raised through the submissions including the SLO requiring that a park within the Liffey Valley be delivered in tandem with, or prior to, residential development, providing enhanced recreation, accessibility, biodiversity, and green infrastructure connections. It also required the preparation of a Planning Authority-approved masterplan, informed by an Ecological Impact Assessment, retention and enhancement of key hedgerows and tree lines, a landscape and historical character assessment, a transport and traffic assessment, and a design statement demonstrating an appropriate response to the setting and curtilage of Protected Structures.

children and future generations to experience and learn about nature in a local setting.

Compliance with National, Regional and Local Planning Policy

Many submissions argued that retaining St. Edmundsbury as High Amenity lands is consistent with the objectives of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES), the Planning and Development Act and the South Dublin County Development Plan.

Reference was made to planning policy objectives concerning biodiversity protection, climate action, green infrastructure, natural capital, landscape preservation, heritage protection and healthy communities. Submitters contended that rezoning would be inconsistent with these policy objectives and would undermine the principles of sustainable development and proper planning. Several submissions also emphasised the importance of evidence-based decision-making, environmental protection and a precautionary approach when considering development on environmentally sensitive lands.

Future Regional Park / Green Belt Vision

A number of submissions supported the long-standing vision of St. Edmundsbury forming part of a wider Liffey Valley Regional Park or green belt.

It is noted that the OPR has made a further recommendation, following on from their initial recommendation to progress the Variation amendments 1-16, that the Variation should be made without this and other material alterations. Due to the reduced residential development capacity and additional housing delivery constraints introduced by the MAs the OPR is concerned at the ability of the Planning Authority to deliver homes in line with National Policy Objective 42 (NPO42) and NPO43 of the NPF First Revision (2025). In relation to St. Edmundsbury specifically, the OPR indicates that it does not support MA6.1 to remove the lands (15ha) which are identified as a significant, sustainably located residential development opportunity in Lucan, whose development is critical to delivering much-needed housing close to employment, services, public transport and community facilities.

The planning merits of the site and the impact of their removal on the delivery of housing to meet the intent of the NPF Implementation Guidelines is also raised by the developer, through their planning consultant. While the comparative table of lands presented in the developer's submission is noted it does not fully reflect the views of the Planning Authority on deliverability of different lands within the Variation. It is also noted that the assessment undertaken by the Planning Authority was based on net yield having regard to the ranges set within the Sustainable Residential and Compact Settlement Guidelines, acknowledging the exact numbers may change within the set range on more detailed assessment of the lands at planning application stage.

The Chief Executive is satisfied that the lands represent a sustainable and sequential growth opportunity which can contribute meaningfully to meeting the County's future housing needs while supporting national and regional objectives for compact growth, sustainable mobility and

Contributors noted that previous planning policies have recognised the strategic value of the lands within the wider Liffey Valley and have promoted aspirations for improved public access and regional recreational opportunities. Some submissions called for the bringing of the lands into public ownership. The lands were frequently described as a significant community asset that could contribute to a future regional park network and provide environmental, recreational and educational benefits on a county-wide and regional scale. Some submissions specifically referenced comparable regional park models elsewhere and advocated for greater protection and enhancement of the lands as part of a long-term green infrastructure strategy. Traffic, Transport and Infrastructure Constraints Many submissions expressed concerns regarding the capacity of local infrastructure to accommodate further development. Reference was made to existing traffic congestion, road network pressures, public transport limitations and significant population growth already experienced within Lucan and surrounding areas. Several submitters argued that infrastructure delivery has failed to keep pace with housing growth and that additional development at St. Edmundsbury would exacerbate existing problems. Concern was raised about increasing traffic volumes, pressure on	efficient land use. Accordingly, the continued inclusion of St. Edmundsbury for residential development is considered appropriate and warranted from a plan-led and evidence-based sustainable planning perspective. Proposed Lands and Clarification of Process The lands proposed to be omitted from the variation, as set out in MA6.1 related to the full extent of the lands initially proposed for St. Edmundsbury. At the CE Report stage for the Special Meeting, the lands were recommended to be revised to include a smaller area for rezoning of approximately 9ha with additional requirements related to environmental sensitivities. As noted by the OPR and also by the developer, notwithstanding the Chief Executive’s recommendation to limit the extent of the lands and strengthen the SLO, the proposed variation to rezone St. Edmundsbury from HA-LV to RES was rejected by elected members by resolution. For clarity, at this stage of the process the elected members can either make the variation with the MA, that is, to remove the lands from the variation, or revert to the original proposal in the proposed draft variation, with the original SLO. The option to revert to the CE Recommendation for a reduced area and additional points to the SLO is no longer available. This reflects the statutory position at the Material Alteration stage whereby the Elected Members must determine the proposal before them, namely the proposed Material Alteration, and cannot introduce a further substantive modification beyond that which has been placed on public display. While the Chief Executive previously recommended a reduced development area and additional environmental safeguards in response
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public transport services and the absence of major transport upgrades capable of supporting further large-scale residential development. Many considered that Lucan has already absorbed significant growth and that sustainable planning requires infrastructure provision to precede additional residential expansion.

NTA

The National Transport Authority (NTA) considers the St. Edmundsbury lands to be a highly suitable location for residential development due to their strong accessibility by existing radial and orbital public transport services. The NTA notes that rezoning the site for housing would support the sustainable delivery of much-needed residential lands in South Dublin County by consolidating development within the existing built-up area and making efficient use of existing and planned public transport infrastructure. Accordingly, the NTA recommends that St. Edmundsbury be prioritised for residential zoning and that the proposed Material Alteration should not be adopted.

Department of Education and Youth (DoEY)

The Department of Education and Youth provided a response to the MA, and whilst no direct submission was received with regard to St. Edmundsbury, the considerations set out in the submission made in response to the variation in March 2026 are reiterated in their submission to the MA.

to submissions received on the draft Variation, the environmental assessments undertaken for Variation No. 2, including SEA, AA and SFRA, did not identify a requirement to omit the lands from the Variation. The Planning Authority remains satisfied that the original proposal, including the requirements of CS7 SLO2, provides an appropriate framework through which ecological, landscape, heritage and environmental considerations can be assessed and addressed in a plan-led manner.

As part of the consultation on the Material Alterations to the Proposed Variation with respect to MA 6.1 the following issues were also raised as part of submissions in support of the Material Alteration. These are as follows:

Green Infrastructure, Biodiversity and Parks

Submissions highlight the ecological importance of St. Edmundsbury as part of the wider Liffey Valley green infrastructure network and raise concerns regarding potential habitat loss, fragmentation of wildlife corridors, impacts on protected species, and the potential loss of biodiversity arising from development. Many submissions also support the long-standing aspiration for the lands to contribute to a wider Liffey Valley Regional Park or green belt, recognising their value as a strategic environmental, recreational and educational resource.

The proposed rezoning has been informed by a robust evidence-based assessment and is accompanied by a Specific Local Objective (SLO) designed to safeguard and enhance the area's ecological and landscape assets. The SLO includes specific requirements for the protection of existing woodland, biodiversity features and environmental sensitivities, while also ensuring the protection of the wider Liffey Valley landscape and the integrity of the Special Amenity Area Order (SAAO). While

The submission stated:

“A population of this magnitude could see a potential future requirement for at least two additional primary schools in the area and a potential future requirement for a post primary school in the Lucan, Adamstown, Palmerstown area would need to be considered” The department notes that the proposed amendment to the Variation does not result in a change to the submission and there is still a potential future requirement for at least two additional primary schools in the area and a potential future requirement for a post primary school in the area would need to be considered.

Community and Social Services

Submissions also highlighted concerns regarding the capacity of local social and community infrastructure. Contributors referred to existing pressures on schools, childcare facilities, healthcare services, community amenities, recreational facilities and other public services.

Many argued that further development should not proceed in advance of the delivery of supporting infrastructure and community services. The retention of St. Edmundsbury was viewed not only as an environmental issue but also as a matter of maintaining quality of life and ensuring that existing communities have access to adequate green space and recreational amenities. A recurring view was that

some submissions seek the inclusion of the entirety of the lands within the SAAO, it is noted that the Order was established in 1990 following significant research and assessment of the lands for inclusion and there is currently no proposal to amend its boundaries. The lands proposed for development are not within the SAAO and the requirement in the SLO for an ecological assessment and for protection of the treeline and hedgerow adjacent to the SAAO to inform the masterplan will ensure that biodiversity will be a key consideration for the layout of development.

Importantly, the proposal facilitates the delivery of a substantial publicly accessible park as part of the long-standing objective to create a Liffey Valley Park. The SLO requires that this park be delivered in advance of, or alongside, residential development, providing a significant recreational, biodiversity and environmental asset under public management. This approach offers a practical mechanism to secure the long-term protection, enhancement and maintenance of lands that are currently in private ownership, while strengthening the protection of the most environmentally sensitive areas within the Liffey Valley. In addition, the proposal will not compromise green infrastructure connectivity and ecological corridors by ensuring that a compact area of lands closest to the Lucan Road are included in the variation while the lands further north and along the river are included as parkland. Accordingly, the Planning Authority considers that the proposed zoning, together with the associated SLO requirements, will not only protect key environmental assets but provides a mechanism through which significant biodiversity, recreational and green infrastructure benefits could be secured that would be difficult to realise fully through the existing zoning alone.

sustainable development requires a balanced approach that aligns population growth with the provision of physical, social and community infrastructure, and that this balance has not yet been achieved in Lucan.

OPR

The OPRs submission recommended that the planning authority make the variation without the proposed MA 6.1. This aligns with the recommendation made by the OPR in response to the proposed variation.

Landowner

McCutcheon Halley Planning Consultants have submitted a submission in response to the material alteration on behalf of the developer, O'Flynn Construction Ltd indicating that they are acting in partnership with the owners of lands at St. Edmundsbury. The submission outlines the continued support and evidence for the inclusion of the lands in the proposed variation and why the proposed material alteration 6.1 should be rejected and the zoning of the site reinstated. The submission also includes documentation which was previously included in the initial response to the public consultation of the proposed variation, noting it is incorporated by reference. A summary of this can be found in the initial CE Report. Two key issues are identified, firstly the planning implications of removing the refined CE recommendation for the

Historic Environment, Landscape Character, Climate Resilience and Community Wellbeing

Submissions emphasise the importance of St. Edmundsbury as a key component of the historic, environmental and landscape character of Lucan and the Liffey Valley. Concerns raised relate to the potential impact of development on the historic demesne landscape, the setting of the River Liffey, Protected Structures and other heritage assets, as well as the potential erosion of local identity, visual amenity and sense of place. Submissions also highlight the contribution of the lands to climate resilience through carbon sequestration, flood attenuation, natural drainage, urban cooling and air quality benefits, and note their value as an accessible green space supporting recreation, health, wellbeing and community identity.

The Planning Authority acknowledges the significance of the wider lands in terms of heritage, landscape and environmental quality. While many submissions outline the community amenity, it is noted that the lands are not in public ownership. However, the proposed zoning is accompanied by a Specific Local Objective (SLO) which requires a comprehensive masterplan-led approach including delivery of a park on the lands outside the area proposed for zoning and environmental safeguards before any development can proceed. The masterplan process will ensure that landscape character, heritage assets, environmental sensitivities and community benefits can be fully considered prior to development.

The lands have been subject to Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA), which confirm that environmental, biodiversity and flood risk issues can be appropriately addressed through the proposed planning framework. Furthermore, the proposal supports climate action

lands and evidence advanced by the CE for their refinement and the reasons put forward in the elected members motions. Secondly, consideration of the wider implications of the proposed MAs for the housing strategy set out in Variation no. 2. The submission in response to the MA consultation includes observations on: - Housing capacity following the rejection of sites from the proposed variation and the SLO on Adamstown related to DART+SW and the impact this has on the overall delivery strategy in response to the revised NPF Section 28 Guidelines. - The lands should be included as identified in the proposed variation or that MA6.1 should not be made and that the CE Recommendations for the revised SLO and reduction in site size should be reinstated. - The total lands in St. Edmundsbury estate comprise of 110 hectares. The SAAO comprises 61ha of this. Residential development was not proposed in the SAAO. Residential was limited to a defined portion of the site, initially c. 15 hectares which was recommended by the Chief Executive to be reduced further to 9.67 hectares and the SLO strengthened following the statutory consultation on the proposed Variation. - The ownership and delivery characteristics of the lands provide a clear implementation	and environmental sustainability through its accessible location, facilitating access to public transport and to nearby facilities and services through a compact development pattern consistent with national planning policy, thus reducing reliance on private transport. The County Development Plan requires that Sustainable Drainage Systems (SuDS) are incorporated into all development and that run-off rates match greenfield rates. The lands are not located within Flood Zones A or B and are compatible with development from a flood risk perspective. Importantly, the SLO also facilitates the delivery of significant parkland as part of a wider ambition for the Liffey Valley Park and enhanced access to the Liffey Valley, creating long-term recreational, health and wellbeing benefits for existing and future communities. The environmental and heritage protections embedded within the SLO have also been acknowledged in submissions from the landowner. Accordingly, the Planning Authority considers that the proposed approach provides an appropriate balance between meeting strategic housing needs and safeguarding the historic, landscape, environmental and community value of the lands, while securing their long-term protection and enhancement through a robust and plan-led framework. A submission highlighted the need to align with the EU Nature Restoration Law. The Planning Authority notes the preparation of Ireland's initial draft National Nature Restoration Plan (NRP) in response to the adoption of the Nature Restoration Regulation (NRR) (EU) 2024/1991 by the European Parliament and the Council of the European Union in 2024. The consultation closed in July 2026. Ireland submitted its initial draft NRP to the European Commission in September 2026. This will follow a period of formal dialogue with the European Commission, incorporating recommendations and
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framework for the coordinated delivery of housing, parkland, access arrangements, green infrastructure, heritage assets and supporting infrastructure - The submission also provides a review of the engagement and process to date including the call for sites, housing need, and the Council's overall approach to the process, stating that St. Edmundsbury was a site identified as being capable of being delivered within the period of the Development Plan, noting changes to the Planning Acts in this regard. - It is contended that the CE recommendation reducing the lands further and strengthening the SLO appropriately balanced housing delivery with environmental and landscape constraints and queries why safeguards that were identified for St. Edmundsbury, (and others for Finnstown and Coldcut) were not considered sufficient to manage constraints in the way that they were on other sites in the Variation where plan-led mechanisms were accepted. The submission questions the reasons put forward through the elected members motions on the lands, suggesting that they did not identify materially new technical evidence or demonstrate why the safeguards identified in the CE Recommendation was incapable of addressing the concerns raised. This was supplemented	observations. The second stage of the public consultation will take place in 2027. Ireland will submit its final NRP to the European Commission by 1 September 2027. It is noted that the current County Development Plan has strong policy on the natural environment in both Chapters 3 and 4, including a Green Infrastructure Strategy. The next County Development Plan will incorporate relevant policy following on from Ireland's Nature Restoration Plan. Traffic, Transport and Infrastructure Constraints The Planning Authority acknowledges concerns raised regarding traffic congestion, public transport capacity and infrastructure constraints in the wider Lucan area. However, the evidence-based assessment undertaken through the Variation process identifies St. Edmundsbury as a highly sustainable and appropriate location for residential development. The lands comprise a sequential growth area located immediately adjacent to the existing built-up area of Lucan Village, thereby supporting national and regional objectives for compact growth, consolidation of established settlements, and the efficient use of available land within the urban footprint. The site is within close proximity of existing schools, healthcare facilities, community services, retail provision and employment opportunities, supporting sustainable travel choices and reducing reliance on private car use. The National Transport Authority (NTA) has expressly supported the identification of St. Edmundsbury for residential development, considering the lands to be a highly suitable location for housing due to their strong accessibility by existing radial and orbital public transport services. The NTA notes that residential development at this location would support the sustainable delivery of much-needed housing in South Dublin County by consolidating growth within the existing built-up area and making efficient use of both existing and planned public
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by a comparative table related to housing analysis and potential yields. - Consideration should be given to whether the revised package of rezonings can still provide sufficient housing capacity, flexibility and delivery resilience to meet the objectives of Variation No. 2, including a review of housing supply implications, site comparisons, the OPR recommendations, notwithstanding the inclusion of lands at Cornerpark and Elmcastle Court, and the ongoing planning and environmental justification for St. Edmundsbury lands. - The submission also highlights a procedural consideration through the addition of the two sites of Elmcastle and Cornerpark/Haughan's Field, see section 3.5 for Procedural Matters.	transport infrastructure. In this regard, the NTA recommends that St. Edmundsbury be prioritised for residential zoning and specifically advises that the proposed Material Alteration should not be adopted. The Planning Authority considers that St. Edmundsbury represents a transport-oriented and sustainable location for residential growth, consistent with national policy objectives relating to compact growth and sustainable mobility. Community Infrastructure, Social Services and Planned Growth Submissions raise concerns regarding the capacity of existing social and community infrastructure in the Lucan area, including schools, childcare facilities, healthcare services, community amenities and recreational facilities. It is argued that existing infrastructure is already under pressure and that additional residential development should not proceed until adequate services and supporting infrastructure are in place to accommodate future population growth. It is noted that in their submission to the Variation, that the Department of Education and Youth was satisfied that there was sufficient capacity in surrounding schools to accommodate development at St. Edmundsbury. The Planning Authority will continue to engage proactively with the Department of Education and Youth regarding the provision of educational infrastructure to serve future growth. As part of planning applications, developers are required to provide creche facilities where the needs of the new population cannot be met in the surrounding area. The lands are adjacent to the village of Lucan and the associated retail and services within the village core and along the Lucan Road. Accordingly, the Planning Authority considers that the proposed framework provides a balanced approach that accommodates necessary housing growth while ensuring the coordinated provision of
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	community services, infrastructure and long-term sustainable development. Procedural Matters The submission from the developer questions the reasons put forward for the elected members motions on the lands at the meetings in June 2026 on the proposed Variation, suggesting that they did not identify materially new technical evidence or demonstrate why the safeguards identified in the CE Recommendation were incapable of addressing the concerns raised. It is noted that the OPR indicated that the reduction of residential lands has not been supported by sufficient evidence to demonstrate that housing growth requirements can continue to be achieved within the plan period. As indicated above and below, the Chief Executive supports the inclusion of the lands in the Variation. However, the Chief Executive is also of the view that members provided their reasons in good faith and that it will be a matter for the OPR following the Members Resolution on the Variation to further assess the potential for the achievement of the housing growth requirements. The issue for consideration at this stage is not whether the Chief Executive's earlier recommendation for a reduced site and strengthened SLO represented an appropriate planning balance, but whether the proposed Material Alteration to omit the lands should be made. Further procedural matters raised in relation to lands included through the material alterations are dealt with in section 3.5 of this report. Conclusion It is recognised that most submissions support the retention of the current HA-LV zoning on the lands at St. Edmundsbury. However, the strategic justification for rezoning these lands is reinforced by their location within Dublin City and Suburbs and the Metropolitan Area and
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	their strong accessibility to existing and planned public transport infrastructure and services and facilities. The rezoning of these lands is therefore consistent with the principles of compact growth and Transit-Oriented Development (TOD) promoted by the National Planning Framework, as well as the application of appropriate densities under the Compact Settlement Guidelines, which seeks to focus residential growth within accessible locations that are well served by existing and planned public transport and close to employment, community facilities, education, retail and other essential services, supporting sustainable communities. The NTA has explicitly stated that lands with strong accessibility to public transport services are a priority and should be zoned in preference to lands in less accessible locations. The proposed rezoning is supported by strong safeguards contained within the SLO, which ensures that development is plan-led. The inclusion within the SLO of the requirement for a park with enhanced recreational amenity and accessibility, while protecting the valley's biodiversity and enhancing the green infrastructure network, to be developed in tandem, or prior to, residential development facilitates a wider ambition set out in the County Development Plan objective to deliver a Liffey Valley Park. St. Edmundsbury is one of three sites identified to meet the targets within the period of the Development Plan which are now proposed to be omitted for rezoning through the material alterations. When the proposed Material Alterations arising from the Special Meetings of South Dublin County Council are taken into consideration, the capacity of the available lands is significantly reduced. Initially, the
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land supply comprised 156.5 hectares with the potential to deliver approximately 7,324 new homes, representing 100% of the baseline requirement and 45% of the additional 50% headroom provided for under the Guidelines. However, following consideration of the proposed Material Alterations, the housing delivery capacity is reduced to 127.76 hectares of land with the potential to deliver approximately 5,649 new homes, thereby reducing the additional availability above the baseline requirement from 45% to 30%. Furthermore, attention is drawn to the additional constraints affecting the delivery of lands at Adamstown SDZ West, where the introduction of an overly restrictive Specific Local Objective (SLO) is estimated to reduce housing capacity by a further 1,019 homes. This would result in the additional availability above the baseline requirement being reduced to approximately 20%, further diminishing the overall housing delivery potential of the proposed variation to the CDP 2022-2028.

The OPR has indicated that the removal of these lands would reduce the amount of land available for residential development, contrary to the Planning Authority's revised housing growth projections. Such a reduction in residential development capacity could limit the supply of housing land and potentially undermine the achievement of housing delivery targets over the lifetime of the Development Plan. Accordingly, the OPR considered that the lands at St. Edmundsbury should remain included within the Variation (see Section 2 of this CE Report), indicating that alongside Finnstown, the lands provide *'land parcels in highly sustainable locations that are well integrated with the existing urban fabric of Lucan. These lands represent a significant opportunity to deliver much-needed housing in proximity to established employment centres, services, public transport and community amenities. Their development is therefore critical to meeting housing need in a planned and sustainable manner.'*

	Accordingly, having regard to the planning merits of the site, its capacity to contribute to the delivery of housing and national planning objectives while offering the potential to deliver on wider objectives for a Liffey Valley Park, to the need for an Ecological Impact Assessment to inform the masterplan, and to the Recommendation of the OPR, the Chief Executive recommends that the lands remain included within Variation No. 2 to the South Dublin County Development Plan 2022–2028, and the material alteration to the lands be rejected.
CE Recommendation To make the Variation without Material Alteration 6.1 and to include the lands as set out in the proposed variation amendment no.6 St. Edmundsbury as follows: To zone the lands RES with the associated CS7 SLO2 as follows: CS7 SLO2 Development on RES-N zoned lands at St. Edmundsbury, Lucan Road shall comply with the following: 1. The development of a park within the Liffey Valley (zoning objective HA-LV) with enhanced recreational amenity and accessibility of the area while protecting the valley’s biodiversity and enhancing the green infrastructure network shall be provided for in tandem with, or prior to, residential development of the adjoining Res-N zoned lands. The park shall include lands within the HA-LV zoning objective to the north and west of the Res-N zoned lands extending to the River Liffey, including to the north and west of St. Patrick’s Hospital grounds, and including connections westwards to Lucan Village and Chapel Hill. A detailed proposal to achieve this shall be agreed with the planning authority in advance of submission of a planning application for residential development on the Res-N zoned lands. 2. A masterplan for the lands shall be prepared by the planning authority or in consultation with, and approved by, the planning authority, in advance of the submission of a planning application for residential development informed by and addressing, inter alia: a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, b. Retention and enhancement of the east-west hedgerow and tree line in the north of the site as recorded on 1st Edition OS maps, c. A Local landscape and historical character assessment,	

- d. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and
- e. A Design Statement outlining how the proposal responds to the setting and special interest of the Protected Structures and their curtilage.

MA7.1 and MA7.2	
Amendment Ref. No. 7 Edmondstown Road (Book of Maps) Amendment Ref. No. 50 (Written Statement)	
Section(s)	Page(s)
Section 2.7.1 Dublin City and Suburbs	72
To amend CS7 SLO6 in Variation No. 2, Amendment No. 7 Edmondstown Road as follows (MA7.1): CS7 SLO6: Development on the RES zoned lands on Edmondstown Road shall comply with the following: a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority, b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage, c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping insofar as possible within development proposals, d. Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be delivered to provide for public transport improvements in advance of occupation of any units and measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 agreed with the NTA. To include CS7 SLO10 in Variation No. 2, Amendment No. 7 Edmondstown Road as follows (MA7.2): CS7 SLO10: To ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.	
Submission No. SD-C431-562 Luke Heffernan SD-C431-563 Caroline Carney	

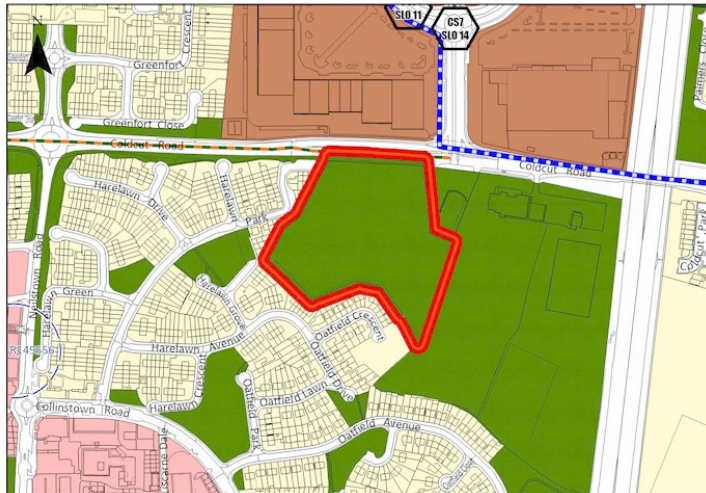
Summary	CE Response
Submissions support the proposed amendments at Edmondstown Road. The amendments represent a positive step towards ensuring that future development is infrastructure led, environmentally responsible and integrated with existing communities.	The Planning Authority welcomes the supporting comments with regards to MA7.1 and MA7.2.
CE Recommendation To make the Variation with MA7.1 as follows: CS7 SLO6: Development on the RES zoned lands on Edmondstown Road shall comply with the following: a. A local centre to serve the day-to-day needs of surrounding residents shall be provided unless otherwise agreed in writing by the planning authority, b. A Design Statement shall be prepared as part of a planning application for the subject lands outlining how the proposal responds to the setting and special interest of the Protected Structure and its curtilage, c. Retention and enhancement of the existing hedgerows as recorded on 1st Edition OS mapping insofar as possible within development proposals, d. Any road upgrades required to facilitate public transport to serve proposed residential development on these lands shall be delivered to provide for public transport improvements in advance of occupation of any units and measures to ensure the extension of public transport to this area and further north as far as the lands south of the M50 agreed with the NTA. AND To make the Variation with MA7.2 as follows: CS7 SLO10: To ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.	

MA9.1	
Amendment Ref. No. 9 Knockmeenagh Framework Site (Book of Maps) Amendment Ref. No. 50 (Written Statement)	
CDP Section(s)	Page(s)
Section 2.7.1 Dublin City and Suburbs	72
To amend CS7 SLO7 in Variation No. 2, Amendment No. 9 Knockmeenagh Framework Site as follows: CS7 SLO7: A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework, including an evidence-based investigation of the potential for delivery of an all weather pitch on the lands in addition to the Artificial Grass Pitch Programme, and include a transport and movement plan, in liaison with TII, NTA and landowners and agreement with TII and the NTA.	
Submission No. SD-C431-9 Laura O'Malley SD-C431-161 National Transport Authority SD-C431-166 Transport Infrastructure Ireland	
Summary	CE Response
A submission supports the provision of an all-weather pitch and considers it a valuable community facility. The submitter indicates that they are firmly in favour of new housing but are concerned about the pace of development within Clondalkin over the past 2-3 years without a corresponding investment in resources to support the community's growth.	This response refers to Material Alteration MA9.1 which altered the Variation by including the addition of an evidence-based investigation of the potential for delivery of an all-weather pitch on the lands in addition to the requirement for agreement with TII and NTA on the required transport and movement plan. All- Weather Pitch

Concerns are raised around traffic congestion, particularly on Knockmeenagh Road and surrounding routes and the ability of this location to facilitate further residential development. Noting that Luas capacity is already strained, noting that there are regular power cuts, DART+ has been delayed indefinitely, and the village remains congested. The NTA has stated that it does not have any significant concerns in relation to Knockmeenagh. TII have stated that they have no further comment to make.	The Council welcomes support for the requirement of an evidence-based investigation into the delivery of an all- weather pitch on the site. Transport Infrastructure The concerns raised in the submission on traffic congestion and related issues in the submission are noted. The requirement for a Transport and Movement Plan, agreed as part of the first stage of the Variation remains, with the added requirement in the material alteration that it has to be agreed with TII and the NTA. TII has indicated that it has no further comment to make on the material alteration while the NTA have stated that they do not have any significant concerns. Conclusion The Material Alterations proposed to the Variation are considered to be consistent with proper planning and sustainable development.
CE Recommendation To make the Variation with the proposed Material Alteration MA9.1 as follows: CS7 SLO7: A phasing and delivery plan for the REGEN zoned lands between the N7 and Knockmeenagh Lane shall be prepared by the planning authority or in consultation with, and approved by, the planning authority in advance of a planning application for development on the subject lands. It shall be integrated with adjoining land uses, deliver on the parameters of the Knockmeenagh Framework site in the Clondalkin Local Planning Framework, including an evidence-based investigation of the potential for delivery of an all weather pitch on the lands in addition to the Artificial Grass Pitch Programme, and include a transport and movement plan, in liaison with TII, NTA and landowners and agreement with TII and the NTA.	

MA11.1

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



Amendment Proposed



Variation as Published

Submission No.

[SD-C431-1 Cllr Francis Timmons](#)
[SD-C431-27 shane lynch](#)
[SD-C431-127 Linda Nolan](#)
[SD-C431-159 Angela Healy](#)

[SD-C431-273 Derek Kennedy](#)
[SD-C431-338 Lea Hearst](#)
[SD-C431-454 Beldare Homes](#)

[SD-C431-497 Paul Gogarty](#)

[SD-C431-6 Gary Hancox](#)
[SD-C431-63 miriam keegan](#)
[SD-C431-133 Josephine Lawless](#)
[SD-C431-161 National Transport Authority](#)

[SD-C431-279 victoria russell](#)
[SD-C431-352 Phelim Seery](#)
[SD-C431-456 Cllr. Helen Farrell](#)

[SD-C431-571 Chris Conway](#)

[SD-C431-8 Madeleine Johansson](#)
[SD-C431-127 Linda Nolan](#)
[SD-C431-142 Patrick Healy](#)
[SD-C431-257 Seán Ó Rudaí](#)

[SD-C431-327 Colm Byrne](#)
[SD-C431-377 Gino Kenny](#)
[SD-C431-488 Office of the Planning Regulator](#)

Summary	CE Response
A range of submissions support the proposed material alteration which removes the proposed rezoning of circa 3.08 hectares of the former Dublin Bus Social Club at Coldcut Road for residential uses. Submissions indicate the following in relation to any proposal to rezone lands at this location; -Proposed rezoning was a knee jerk reaction to housing crisis removing a recreational use which had been available since 1967. -The Rowlagh Area has the highest concentration of population per Km³ (CSO, 2022). The wider North Clondalkin area is experiencing a shortage of resource centres and sports and recreational activities for the young population and has long been neglected. With increasing population such as at Liffey Valley this need is more urgent. -The lack of facilities risks increasing anti-social behaviour. - Potential negative impacts on urban green space, biodiversity and the Green Infrastructure objectives of the County Development Plan. - Concerns around the capacity of existing public transport and infrastructure to support further residential development, and notes that housing targets can be met without developing these lands.	Material Alteration MA11.1 proposes ‘to omit Amendment Ref No. 11 Coldcut Road’. Amendment No. 11 Coldcut Road proposed a change of zoning of c. 3 hectares from ‘OS’ ‘To preserve and provide for open space and recreational amenities’ to ‘RES’ ‘To protect/or improve residential amenity’. The proposed rezoning was accompanied by a Specific Local Objective CS7 SLO9 which stated: <i>‘In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social Club, details as to how public access, permeability and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority.’</i> Extent of Proposed Zoning within the wider Open Space Lands The lands proposed to be omitted from being rezoned by MA11.1 comprise approximately 3 hectares on the western side of the overall 10.88 hectares of lands that are currently zoned OS and were used for many years in their entirety by Dublin Bus Services Sports and Social Club. The 3 hectares of proposed rezoning to be omitted in the MA comprise of a field closest to Harelawn Park which was previously used as a GAA pitch, which appears to have been last used and maintained in 2019, and a small portion of the pitch and putt course as it runs south from Larkfield House to the back of the houses at Oatfield Crescent.

- Concerns that rezoning the lands will affect meeting climate change targets as Ireland have only reduced emissions by 5% since 1990 while the rest of Europe have reduced by 40%. - Rezoning would primarily benefit a private developer through increased land values, while likely resulting in unaffordable homes for sale or rent. This land should be protected for the benefit of the local community, not for private profit. - Rezoning goes against 2 major EU Directives 2016/2284: reduction of 5 pollutants 2 of which are sources of nitrogen oxides and fine particulates matter. This is evidenced by the fact that the area is surrounded by excessive traffic from Liffey Valley and the M50. 2024/1991 Urban Nature Plan which includes: City parks, Urban Hedges, Community gardens and ensuring resident live within 300 meters of high-quality accessible public green garden space and recreation spaces to improve mental and physical health. Submissions request the following in respect of this site: This site is not rezoned and the motion to reject the proposed rezoning stands.	For clarity, the remainder of the previous Dublin Bus Services Sports and Social Club lands are not part of the Variation and no change to their Open Space zoning was proposed in the Variation. These remaining zoned OS lands comprise approximately 7.8 hectares and include the clubhouse with bar (The Coldcut Club), most of the pitch and putt course, and the large astro pitch and grass pitch running parallel to the M50 (which are still available for rent to the public on the Coldcut Club website). It is noted that planning permission was granted by An Coimisiun Pleanála in February 2025 (PLO6S.320909) for a change of use of the club function room to restaurant use. In the context of the Material Alteration, many of the submissions suggest a range of uses to be provided on the site should the zoning be omitted as per the proposed Material Alteration. While many of the uses suggested are permitted in principle or open for consideration under the OS zoning, this stage of the Variation process is limited to a decision on whether to zone the lands as put on public display for the proposed Variation or whether to reject the zoning as reflected in the Material Alteration (with or without minor modification). The lands proposed for the c. 3 hectare rezoning remain in private ownership and are not currently accessible to the public. The proposed rezoning, as outlined above, included an objective in the form of CS7 SLO 9, which required details on how public access and recreational facilities on the remaining 7.8 hectares of Open Space zoned lands would be improved should the proposed rezoning have advanced: a) 'In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social Club, details as to how public access, permeability
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The following be provided on the site to support existing growing population and reduce the risk of anti-social behaviour;

- Enhanced public access including walking routes.

- Public open space for local sports groups, community groups and a general place for leisure as an amenity.

- In order to serve local clubs and community the existing sports facilities should be retained and enhanced with the provision of a new running track and the reopening of the GAA and football pitch (as astro pitch) including increased public access to the pitch and putt/golf course lands.

- The site should be used to support community and cultural amenities including art, music, daycare facilities, a family resource centre and autism facilities (hub), adult education, training for special needs youths and adults, counselling, youth clubs, and other civic and social events. The existing clubhouse could be re-purposed to provide these facilities.

Landowner - Beldare Homes

The submission notes that in the context of the lands being suitable for zoning when measured against all available objective metrics the current proposal to not rezone three lands is unintelligible and contrary to proper planning and development. The core objection to the zoning based on the grounds that

and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority.'

Variation Context and Process to Date:

The NPF Implementation Guidelines requires Councils to identify the lands needed for delivery of the new targets within the Development Plan period. They also included the need for Councils to consider capacity for up to 50% above the baseline housing growth requirements to provide options for delivery. The Settlement Capacity Audit (SCA) presented to Councillors in October 2025 indicated that by the end of 2028 the current zoned land in the county could deliver 9,613 dwellings based on a business-as-usual model. The NPF Revised baseline housing target for the county to 2028 is 11,699 dwellings, resulting in an identified shortfall of lands to deliver 2,086 units.

Following the full review process Variation No. 2 identified lands which significantly increased the capacity of the county to deliver the baseline target of 11,699 units to 2028 through providing an additional 156.5 hectares which provided for c. 45% additional provision over the baseline requirement.

Following the outcome of the Special Council Meetings on 19th and 24th June 2026, Members made a resolution to publish Material Alterations to the Variation. The impact of the changes made by way of MA is that the lands proposed for zoning have reduced to 127.8 ha with the potential for an estimated 5,649 new homes. This reduces the additional provision to approximately 30%. A further material alteration relating to the timing of commencement of construction at Adamstown West, would effectively reduce the additional provision further to approximately 20% within the lifetime of the current CDP, further

these lands should remain as open space is misplaced and opportunistic. The lands are currently unused and overgrown. More significantly, it ignores the Specific Local Objective CS7 SLO 9 which accompanied the proposed zoning and which would provide for improved public access, permeability and recreational facilities on the remaining OS zoned lands. This represents a significant planning gain/betterment over the current situation.

The subject lands are considered appropriate for residential zoning, aligning with the requirements and assessments in determining sequential and appropriate lands for rezoning. The submission identifies the reason for the appropriateness of the re-zoning as follows:

Sequential Location: The subject lands are within the existing built-up area of Clondalkin and adjoin established residential development, representing a logical consolidation of the urban footprint.

Serviced Urban Lands: The subject lands are located along Coldcut Road within an area already supported by existing road, utilities, and community infrastructure.

Accessible Location: Proximity to key transport corridors, including Coldcut Road and the M50, together with existing and planned public transport services. In fact, the NTA submission on the proposed variation noted that ‘The sites at St.

diminishing the overall housing delivery potential of the proposed variation to the CDP 2022-2028.

OPR and MA Recommendation 1

It is noted that the OPR has indicated concern at this reduction and considers that the proposed material alterations that reduce residential development capacity, constrain the delivery of housing on suitably located lands and risks undermining the delivery of housing targets within the plan period.

Specifically, in relation to Coldcut and MA11.1, the OPR states:

While MA 11.1 relates to a relatively small area of land at Coldcut (3 ha) adjacent to Liffey Valley Major Retail Centre (MRC), it is well located to support compact growth and the integration of land use and transport while retaining 7ha of open space for recreational and amenity purposes. The Office therefore remains of the view that the zoning of this land for residential development would facilitate housing growth consistent with national policy.

The Office, within Recommendation 1, recommends that the Planning Authority makes the proposed Variation without MA11.1.

The Chief Executive’s Report to the submissions at the proposed Variation stage and in the response to motions at the June meetings emphasised the robust process undertaken in identifying the capacity of existing lands to deliver the housing targets and in the identification of lands suitable for the shortfall and additional provision to meet the NPF Revision requirements. The lands at Coldcut were identified as part of that robust assessment process and the Chief Executive remains of the strong view that they are suitable for residential development

Edmondsbury (sic), Liffey Valley and Coldcut are served by a variety of radial and orbital services while the site at the Foxhunter could potentially be served effectively by the same services, subject to details of any emerging development proposal’.

Integration with Existing Communities: The lands are directly bounded by established residential neighbourhoods, allowing development to integrate with the existing urban structure.

Infrastructure Capacity: The location allows efficient use of existing services and infrastructure while accommodating appropriate access and servicing upgrades where required.

Compact Growth: A residential zoning would support national and regional planning objectives by facilitating sustainable residential development on well-located lands within the urban area.

The submission invites the planning authority to not accept the rejection of the proposed residential zoning and associated Specific Local Objective.

NTA Submission

The NTA state that the site at Coldcut is served by a variety of radial and orbital services and is therefore accessible by public transport. The NTA are of the view that to meet the required demand for housing lands in South Dublin County in as sustainable a manner as possible, this site should be rezoned for

while also facilitating improvements to the recreational facilities on the remaining 7 hectares of Open Space lands.

Transport Infrastructure

Significant investment has been made in recent years in transport infrastructure in the area, with new and improved cycling infrastructure and a bus hub at Liffey Valley which will continue to increase the level of multi-directional bus services as BusConnects rolls out.

The NTA submission states that the site at Coldcut is served by a variety of radial and orbital services and is therefore accessible by public transport. It also states that the NTA are of the view that in order to meet the required demand for housing lands in South Dublin County in as sustainable a manner as possible, this site should be rezoned for residential use as originally proposed. The NTA indicates that the development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services and therefore should be prioritised.

Community and Recreational Facilities

In relation to submissions on community and recreational facilities, the site is located adjacent to the Liffey Valley Shopping Centre providing a range of retail and leisure facilities. There are also a range of schools and creches located in the area, identified in the CE Report to Councillors considered at the Special Council meetings in June 2026.

In addition, the requirement for creche facilities as part of development is assessed during the planning application process having regard to Childcare Guidelines.

residential use as originally proposed. The development of these lands would align with the principle of consolidating development within the existing built-up area in locations served by existing and proposed public transport services and therefore should be prioritised. The recommendation of the NTA states as follows; ‘The NTA is of the view that, in meeting the Council’s requirement to zone additional lands for housing, the local authority should prioritise Coldcut and recommends that this Material Alteration is not made.’	Collinstown Park immediately adjoins the area of open space proposed to be retained on the wider site beside the proposed area for zoning with potential for direct permeability links between the wider Social Club site and Collinstown Park. The Park includes play areas and dog runs as well as supporting active recreation in terms of pitches. Collinstown Park Sports Complex adjacent to the park and to Collinstown Community College offers various sports facilities and activities including a Cycling Inclusion Centre of Excellence. Cherry Orchard Football Club has an astro pitch within easy reach off the R833. The inclusion of CS7 SLO9 in the proposed Variation links the residential development with providing public access and improved recreational facilities as part of or prior to development, as stated in the proposed SLO on the remaining OS lands. The lands are also very accessible to Ballyfermot Primary Care Centre which lies further to the east along the Coldcut Road, R833 and local GP practices. The Hermitage Medical Clinic is also close by. The Chief Executive acknowledges the need for continued investment in community, recreational and youth facilities in the County. The Council will continue to support the enhancement of existing facilities and the delivery of new facilities through its Capital Programme and other funding initiatives, having regard to identified needs and available resources. EU Directives As set out in response to the motion 111 (ID91737) at the Special Council Meeting on 24th June, the National Emissions Ceiling Directive 2016/2284 requires a reduction of national emissions of certain
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	atmospheric pollutants and amends an earlier directive. In urban areas these pollutants can be closely connected to transport capacity and travel behaviour. There are a number of air monitors in SDCC, the closest to Coldcut is on the R120 in close proximity to St Patricks Catholic Church in Lucan. The monitor measures PM10 and NO2 levels in the area. In 2025 there was no exceedance under Ambient Air Quality Standards Regulations 2022. It is noted that there have been four exceedances to date in 2026, but the Planning Authority has been advised that some of these can be attributed to road works that have taken place on the stretch of road where the monitor is positioned. The Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive states that the daily limit for PM10 is 50 ug/m3. The limit is deemed breached if more than 35 exceedances occur during the year. The hourly limit for NO2 is 200 ug/m3. The limit is deemed breached if more than 18 exceedances occur during the year. Neither of these figures were exceeded on any days in 2025. As a result, the air quality is within the parameters set out in the Directive. With regard to a submission relating to the EU Nature Restoration Law and Regulation 2024/1991 Article 8, it is noted that the first consultation on Ireland's Nature Restoration Plan, required under the Restoration Law, commenced during the 1st week of June 2026 and the draft Plan has now been submitted to the EU. With regard to urban ecosystems, an aim is to ensure that the coverage of urban green spaces, in particular trees, will no longer be at risk of being reduced. This requirement aligns very well with SDCC's green infrastructure policy in the County Development Plan and in particular with the requirement that all development meets with the minimum scoring requirements of the Green Space Factor – an objective of the County Development Plan which is being successfully implemented in development.
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	The proposed rezoning was assessed through the environmental assessment process accompanying Variation No. 2 and no environmental assessment identified a basis for excluding the lands from consideration for residential zoning. Conclusion While submissions object to the proposal to zone the lands at Coldcut, the strategic justification for rezoning these lands is reinforced by their location within Dublin City and Suburbs and the Metropolitan Area and their strong accessibility to existing and planned public transport infrastructure and services and facilities. The rezoning of these lands is therefore consistent with the principles of compact growth and Transit-Oriented Development (TOD) promoted by the National Planning Framework, which seeks to focus residential growth within accessible locations that are well served by existing and planned public transport and close to employment, community facilities, education, retail and other essential services. The NTA has explicitly stated that lands with strong accessibility to public transport services are a priority and should be zoned in preference to lands in less accessible locations. The proposed rezoning ensures the retention of approximately 7 hectares of the overall original c. 10 hectares of open space zoning. The SLO provides for a gain to the community in that it requires development to be linked to improvements to public access, permeability and recreational facilities on the remaining OS zoned lands.
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	Coldcut is one of three sites identified to meet the targets within the period of the Development Plan which are now proposed to be omitted for rezoning through the material alterations. When the proposed Material Alterations arising from the Special Meetings of South Dublin County Council are taken into consideration, the capacity of the available lands to deliver the targets is significantly reduced. Initially, the land supply comprised 156.5 hectares with the potential to deliver approximately 7,324 new homes, representing 100% of the baseline requirement and 45% of the additional 50% headroom provided for under the Guidelines. However, following consideration of the proposed Material Alterations, the housing delivery capacity is reduced to 127.76 hectares of land with the potential to deliver approximately 5,649 new homes, thereby reducing the additional availability above the baseline requirement from 45% to 30%. Furthermore, additional constraints affecting the delivery of lands at Adamstown SDZ West, through the Specific Local Objective (SLO) is estimated to impact housing capacity by a potentially further 1,019 homes. This would result in the additional availability above the baseline requirement being reduced to approximately 20%, further diminishing the overall housing delivery potential of the proposed variation to the CDP 2022-2028. The OPR has indicated that while the lands at Coldcut are smaller than other identified lands, they are well located to support compact growth and the integration of land use and transport while retaining 7ha of open space for recreational and amenity purposes. As such, the Office is of the view that the zoning of this land for residential development would facilitate housing growth consistent with national policy. The removal of these lands would reduce the amount of land available and the options for delivery of residential development in sustainable
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	locations, making the achievement of the Planning Authority's revised housing growth targets more difficult. Accordingly, having regard to the planning merits of the site, its capacity to contribute to the delivery of housing and national planning objectives, and to the Recommendation of the OPR, the Chief Executive recommends that the lands remain included within Variation No. 2 to the South Dublin County Development Plan 2022–2028, and the material alteration to the lands be rejected.
CE Recommendation To make the Variation without Material Alteration 11.1 and to include the lands as set out in the proposed Variation Amendment no. 11 Coldcut as follows: To zone the lands RES with the associated CS7 SLO9: <i>In tandem with, or prior to, development of the RES zoned lands to the south of Coldcut Road at the Dublin City Services Sports and Social Club, details as to how public access, permeability and recreational facilities will be improved on the remaining OS zoned lands shall be agreed with the planning authority.</i>	

MA14.1		
Amendment Ref. No. 14 Foxhunter (Book of Maps) Amendment Ref. No. 50 (Written Statement)		
Section(s)	Page(s)	
Section 2.7.1 Dublin City and Suburbs	72	
To add CS7 SLO12 in Variation No. 2, Amendment No. 14 Foxhunter as follows:		
CS7 SLO12: To ensure that any planning application on these lands adequately addresses vehicular access from the existing road network having regard to the need to protect the residential amenity of the adjoining area and safeguard the function of the national road network.		
Submission No.		
SD-C431-136 Eileen Dennehy	SD-C431-161 National Transport Authority	SD-C431-223 Little Folk Preschool
SD-C431-225 Little Folk Preschool	SD-C431-244 Áine Byrne	SD-C431-359 Tessa Curran
SD-C431-360 Donal Curran	SD-C431-365 Caroline O'Brien	SD-C431-366 John O'Brien
SD-C431-367 Hermitage Park	SD-C431-445 Diane Grogan	SD-C431-476 Lynsey Dunne
SD-C431-477 Declan Dunne	SD-C431-478 Ann Dunne	SD-C431-479 Andrew Dunne
SD-C431-497 Paul Gogarty	SD-C431-166 Transport Infrastructure Ireland	
Summary	CE Response	
Residential Amenity and Access A number of submissions support MA14.1 and the inclusion of provisions requiring that any planning application on the subject lands adequately addresses vehicular access arrangements to protect	The Planning Authority notes that the majority of submissions supported the alteration, either through support for MA14.1 generally or through a request to strengthen the related wording through the inclusion of a Specific Local Objective (SLO) or similar.	

the residential amenity of adjoining properties and the function of the surrounding road network.

Notwithstanding this, several submissions request that MA14.1 be strengthened through the inclusion of a Specific Local Objective (SLO), or similar provision, explicitly restricting vehicular access to any future development through Hermitage Park and/or Hermitage Gardens. It is stated that access through the existing residential estate would adversely affect residential amenity and result in increased traffic movements, parking pressure, road safety concerns and impacts on the operation of the surrounding road network.

In addition, submissions refer to the planning history of the site, noting that previous applications for residential development have been refused by An Coimisiún Pleanála (formerly An Bord Pleanála), and that those decisions demonstrate the lands are not suitable for residential development.

Traffic and Roads

A submission was received from Transport Infrastructure Ireland (TII), which made comment on the overall Proposed Material Alterations:

Having regard to official policy and previous TII submission, TII has no observations to make on the proposed material alterations on display.

Residential Amenity and Access

The concerns raised in the submissions generally focused on residential amenity, traffic impacts and access arrangements.

In relation to the inclusion of a more prescriptive SLO prohibiting vehicular access through Hermitage Park and/or Hermitage Gardens, it is considered that the wording of CS7 SLO12 provides an appropriate and adequate safeguard and framework for the assessment of options for any future planning application ensuring that regard is had to the need to protect residential amenity and the surrounding road network.

In relation to concerns regarding previous refusals on the subject lands by An Coimisiún Pleanála (ACP), formerly An Bord Pleanála (ABP), it is noted that each application is assessed on its own individual merits, having regard to the policy context and material considerations at the time of determination. As set out in the previous CE Report on the Variation, the application being referred to in submissions was refused by SDCC and by ACP for various reasons, each of which would have to be overcome to the satisfaction of the planning authority in any future planning application. It should also be noted that any proposal will need to comply with the standards and requirements of the SDCC County Development Plan and any relevant national guidelines, as required, in addition to the proposed SLO introduced by this MA on the lands.

Traffic and Roads

The submission from TII is noted and welcomed.

Public Transport

The submission from the NTA is noted and welcomed.

Public Transport A submission was received from the National Transport Authority (NTA), which noted MA14.1 alongside a number of other sites and stated: <i>On review of the above, the NTA does not have any significant concerns and welcome those which relate directly to our recommendations made in the first stage of the variation process.</i> Heritage An individual submission highlights the heritage significance of the Foxhunter building and its contribution to Lucan's architectural character, local identity and sense of place. The submission supports the conservation, restoration and adaptive reuse of the building and states that its retention would contribute positively to the cultural, social and economic vitality of the area.	Heritage The contents of the submission are noted with regard to heritage. Notwithstanding this, while the MA includes the need to protect residential amenity, the issues raised regarding built heritage do not relate directly to the proposed MA14.1. The impact on any built heritage will be considered, as appropriate, in the assessment of any future planning application. Conclusion For the reasons set out above, no further amendment to the SLO is considered necessary or appropriate. Furthermore, the inclusion of an additional SLO or an amended SLO as proposed in some submissions would not be considered a minor modification and as such, cannot be considered under MA14.1 at this stage of the process as per Section 58 (13)(f)(ii) of the Planning and Development Act 2024. As such, the inclusion of a more prescriptive restriction on vehicular access through Hermitage Park and/or Hermitage Gardens would not constitute a minor modification to the published Material Alteration and therefore cannot be considered at this stage of the process. It is recommended to retain the wording as proposed in MA14.1.
CE Recommendation To make the Variation with MA14.1 as follows: CS7 SLO12: To ensure that any planning application on these lands adequately addresses vehicular access from the existing road network having regard to the need to protect the residential amenity of the adjoining area and safeguard the function of the national road network.	

MA16.1	
Amendment Ref. No. 16 Liffey Valley MRC (Book of Maps) Amendment Ref. No. 50 (Written Statement)	
Section(s)	Page(s)
Section 2.7.1 Dublin City and Suburbs	72
To include CS7 SLO14 in Variation No. 2, Amendment No. 16 Liffey Valley MRC as follows: CS7 SLO14: a. Development on these lands shall have regard to the requirements of the Department of Education and Youth any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development. b. Ensure that future masterplans and development proposals for residential development within Liffey Valley MRC maximises opportunities for basement or undercroft car parking provision where feasible, to minimise the extent of surface-level parking and maximise the availability of land for public open space, community facilities, active travel infrastructure, landscaping, biodiversity measures and high-quality public realm. c. Residential development on these lands shall include the provision of a multi-purpose community centre unless otherwise agreed by the Planning Authority.	
Submission No. SD-C431-124 Kate Henry SD-C431-135 Shane Nestor SD-C431-141 Patrick Healy SD-C431-157 Michael Murphy SD-C431-158 Sophie Henry SD-C431-281 Brady Shipman Martin SD-C431-439 Department of Education and Youth SD-C431-501 LIONA O'TOOLE	
Summary	CE Response

Submissions are in general support of the Specific Local Objective (SLO) and the requirement for underground or undercroft parking. It is seen as forward thinking, good planning practice and an efficient use of valuable urban land that will reduce surface parking. It will help improve the quality of the public realm, encourage higher-quality urban design and support more sustainable development within this strategically important location. The challenge now is not simply delivering more housing but ensuring that future growth takes place in a sustainable and balanced manner. It was identified that a family resource centre must be built for the local community. A submission was made by Brady Shipman Martin on behalf of Hines Real Estate Ireland welcoming the decision to amend the Major Retail Centre (MRC) zoning objective on the lands to include residential. Hines Real Estate Ireland seeks to deliver an urban hub with SDCC area that is well connected by public transport. The ongoing expansion programme for the centre has delivered significant improvements to the operation of Liffey Valley Centre. The submission notes the proposed inclusion of CS7 SLO14 (under MA16.1) as a material alteration and Hines Real Estate Ireland are committed to engaging with SDCC in respect of the identification of supporting educational and community infrastructure. The submission is in support of the inclusion of MA68.6 with updates to Policy EDE10.	At the Special Council Meetings in June 2026 to consider the proposed Variation it was agreed to include residential use within the MRC zoning objective at Liffey Valley. The proposed Material Alteration, subject to this stage of the process and outlined above provides for a number of objectives contained within points a to c of a new CS7 SLO14, to be considered or included as part of any residential development on the lands. The Department of Education and Youth's noting of CS7 SLO14, point (a) is acknowledged. The submissions supporting the material alterations contained within CS7 SLO14 are welcomed, noting that they generally relate to point (b) of the SLO. The matters relating to a family resource centre are noted, nevertheless CS7 SLO14, point (c) requires the provision of a multi-purpose community centre as part of any development on the subject lands, unless otherwise agreed with the Planning Authority. This provides the platform for additional assessments to be carried out, informing the local demand for this facility while directing the design and layout of the space. In this regard, the indication by Hines to engage with SDCC in respect of the identification of supporting educational and community infrastructure is welcomed. Summary In summary, submissions which addressed the points within the material alteration generally favoured or supported them, in particular the need for undercroft or basement car parking in order to free up surface space for better use. While a number of submissions raised other issues, these were outside the scope of the proposed Material
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The Department of Education and Youth notes the proposed amendment for Liffey Valley MRC to include CS7 SLO14 (a).	Alteration, and a brief summary of these issues is provided in Section 3.4 of this CE Report. It is recommended that the MA is retained in full as part of the variation with minor modifications for grammatical and clarity purposes as outlined below.
CE Recommendation To make the Variation with MA16.1 points a to c within CS7 SLO14, with minor modifications for grammatical and clarity purposes (shown in green bold) to point (a) as follows: CS7 SLO14: a. Residential development on these lands shall have regard to the requirements of the Department of Education and Youth and any planning application on this site shall be accompanied by evidence that sufficient primary and secondary school capacity is available in the wider area to serve existing and proposed development. b. Ensure that future masterplans and development proposals for residential development within Liffey Valley MRC maximises opportunities for basement or undercroft car parking provision where feasible, to minimise the extent of surface-level parking and maximise the availability of land for public open space, community facilities, active travel infrastructure, landscaping, biodiversity measures and high-quality public realm. c. Residential development on these lands shall include the provision of a multi-purpose community centre unless otherwise agreed by the Planning Authority.	

MA17.1		
Amendment Ref. No. 17 Adamstown South and West (Outer) (Book of Maps) Amendment Ref. No. 42 (Written Statement)		
Section(s)	Page(s)	
2.6.1 Land Capacity Study	48	
To include a new Specific Local Objective for the Adamstown South and West (Outer) SDA lands (CS3 SLO3) as follows:		
CS3 SLO3: The Area-Based Transport Assessment for these lands shall include an assessment of DART+ Southwest, Luas to Lucan, road infrastructure and existing bus services serving Adamstown and Clonburris at the early stages of the ABTA process for the purpose of identifying transport options for assessment at the later stages of the ABTA regarding sufficiency to serve existing and future transport demand scenarios.		
Submission No.		
SD-C431-84 William Lavelle	SD-C431-124 Kate Henry	SD-C431-134 John Kelly
SD-C431-135 Shane Nestor	SD-C431-157 Michael Murphy	SD-C431-158 Sophie Henry
SD-C431-158 Sophie Henry	SD-C431-161 National Transport Authority	SD-C431-182 Sean Giblin
SD-C431-365 Caroline O'Brien	SD-C431-366 John O'Brien	SD-C431-367 Hermitage Park
SD-C431-401 Cairn Homes Plc.	SD-C431-459 Darren Brennan	SD-C431-464 Development Applications Unit
SD-C431-497 Paul Gogarty	SD-C431-501 LIONA O'TOOLE	SD-C431-522 Ashleigh D'Arcy
SD-C431-567 Ben Healy		
Summary	CE Response	

Submissions generally support MA17.1 and CS3 SLO3, particularly the requirement for an Area-Based Transport Assessment (ABTA) to examine the capacity of DART+ South West, Luas to Lucan, road infrastructure and existing bus services to accommodate future growth. Submitters emphasise that Adamstown and Lucan are expected to experience substantial residential expansion and that transport planning should occur in advance of development to ensure sustainable growth. Several submissions highlight existing transport constraints, including the absence of DART and Luas services, overcrowded bus services, traffic congestion and limited road capacity. Concerns were raised that future transport assessments should reflect actual conditions experienced by residents and fully assess the cumulative impacts of planned development on the transport network. A common theme across submissions is support for an infrastructure-first approach, whereby the adequacy of transport infrastructure is assessed and, where necessary, delivered before or alongside major residential development. Some submissions also sought consideration of wider strategic transport interventions and future network improvements to ensure that sufficient transport capacity is available to meet both existing and future demand in Adamstown South and West (Outer).	It is noted that submissions indicate general support of the addition of an SLO in the form of CS3 SLO3 pertaining to Area Based Transport Assessment on the Adamstown South and West SDA and additional transport options related to same. The Chief Executive considers the SLO as being appropriate, ensuring the studies undertaken as part of the analysis for the SDA include a robust area based transport assessment. This would provide for an assessment of the cumulative impact of development, both existing and planned on the transport network, a concern raised in submissions. It is also noted that the NTA has no concerns with the SLO, noting that the material alteration aligns with and respond directly to recommendations they made during the first stage of the variation process. Landowner The landowners support for the need for a strategic transport and infrastructure assessment is welcomed. A request by the landowner for a stronger timebound approach to the assessments is noted. The proposed Variation has identified land to meet the revised housing targets with additional provision to serve needs up to 2028 and beyond. Notwithstanding, it is the intent of the Chief Executive to advance the studies needed for this strategic development area in as timely a manner as possible to ensure that informed decisions can be made on future rezoning to serve housing growth requirements. It is considered that the SLO is appropriate as written to deliver on plan-led development in a timely manner. DAU The Council notes the submission from the DAU from the DHLGH with regard to the presence of a recorded monument on the land.
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NTA With regard to MA 17.1 (Adamstown South and West), the NTA has reviewed the proposed Material Alteration and does not have any significant concerns. The NTA welcomes these alterations, noting that they align with and respond directly to recommendations made during the first stage of the variation process. Landowner Submission A submission was received from Cairn Homes Plc and the Crowley Family, as landowners of Adamstown South, which broadly supports the strategic importance of Adamstown South and West (Outer) and its designation as a Future Strategic Development Area. The submission supports the need for strategic transport and infrastructure assessment but seeks stronger and more time-bound commitments to progressing transport modelling, infrastructure assessments, masterplanning and other supporting studies during the lifetime of the current Development Plan. DAU – DHLGH The DAU provided a submission which outlined the presence of a recorded monument on the lands.	Consideration of same will form part of the wider study of the lands and will inform more detailed design within the lands at the appropriate stage. Conclusion Include the proposed SLO outlined in the MA 17.1 as part of Variation no. 2 to the County Development Plan.
CE Recommendation To make the Variation with MA17.1 through the inclusion of CS3 SLO3 on the lands at Adamstown South and West (Outer) to be reflected in the Written Statement under Policy CS3 of Variation no. 2 to the South Dublin County Development Plan 2022-2028.	

MA17.2		
Amendment Ref. No. 17 Adamstown South and West (Outer) (Book of Maps) Amendment Ref. No. 42 (Written Statement)		
Section(s)	Page(s)	
2.6.1 Land Capacity Study	48	
To include a new Specific Local Objective for the Adamstown South and West (Outer) SDA lands (CS3 SLO4) as follows:		
CS3 SLO4:		
To ensure that the plan-led approach for any future Strategic Development Area within Adamstown South and West (Outer) includes investigation of the need for an additional rail station and appropriate community, recreation, and leisure infrastructure to serve the lands, including an evidence based assessment of the need for a public swimming pool, a multi-sport campus comprising indoor and outdoor facilities, a Garda Station, and health facilities having regard to any deficits that may exist in the surrounding area and to the needs of the relevant stakeholders, and where considered such infrastructure is required, the appropriate delivery mechanisms for same.		
Submission No.		
SD-C431-84 William Lavelle	SD-C431-124 Kate Henry	SD-C431-134 John Kelly
SD-C431-135 Shane Nestor	SD-C431-157 Michael Murphy	SD-C431-158 Sophie Henry
SD-C431-161 National Transport Authority	SD-C431-163 Miroslav Slivka	SD-C431-182 Sean Giblin
SD-C431-365 Caroline O'Brien	SD-C431-366 John O'Brien	SD-C431-367 Hermitage Park
SD-C431-401 Cairn Homes Plc.	SD-C431-459 Darren Brennan	SD-C431-464 Development Applications Unit
SD-C431-497 Paul Gogarty	SD-C431-501 LIONA O'TOOLE	
Summary	CE Response	
A significant number of submissions support MA17.2 and the inclusion of a plan-led approach requiring the investigation of transport, community, recreation	It is noted that submissions indicate general support for the additional SLO outlined in MA 17.2 and the need for further investigations into additional transport, community and social infrastructure and services.	

and social infrastructure needs as part of any future Strategic Development Area within Adamstown South and West (Outer). Submitters generally consider the proposed SLO to be an appropriate mechanism to ensure that future growth is supported by the facilities and services required to create sustainable communities.

A recurring theme across the submissions is that Adamstown and Lucan are expected to accommodate substantial future population growth and that infrastructure planning should occur before or alongside development rather than after residential areas have been established.

Community, Health and Social Facilities

A number of submissions strongly support the requirement to investigate the need for:

- A Garda Station and community policing facilities.
- Healthcare and primary care facilities.
- A public swimming pool.
- Indoor and outdoor sports facilities.
- Community and social infrastructure.

Submitters state that these facilities are necessary to support one of the county's largest future growth areas and argue that previous development in Lucan and Adamstown has not always been matched by timely delivery of community services. Supporters consider the SLO necessary to ensure that residents

Community, Health and Social Facilities

The SLO provides an additional layer of robustness to ensure the studies undertaken as part of the analysis for the long term development area reflect the options and needs related to transport (in this case the rail station, noting that MA17.1 relating to the lands requires a robust transport assessment), community and social infrastructure and services. It is noted that the SLO includes the need to identify the appropriate delivery mechanisms where infrastructure is identified as being required.

Infrastructure Led Development

The associated policy and objectives for the Future Long Term Development Areas (SDAs) which were agreed for inclusion within the Written Statement of the County Development Plan at the earlier stage of this process will, alongside the two material alterations proposed under MA17.1 and 17.2, ensure a plan led approach to the future potential development of the lands. This will require that key infrastructural needs will be assessed and planned for appropriately.

Timing of Assessments

The support by landowners for the principle of undertaking strategic transport, infrastructure, community planning and masterplanning studies to inform the future development of the area is welcomed. Concerns raised by the landowners on the timing and progression of the required studies and the need for more certainty is noted. It is relevant that the proposed Variation has identified land to meet the revised housing targets with additional provision to serve needs up to 2028 and beyond. Notwithstanding, it is the intent of the Chief Executive to advance the studies needed for this strategic development area to ensure that informed and timely decisions can be made on

do not have to wait years or decades for essential facilities, however some emphasise that the facilities identified should ultimately be delivered where evidence demonstrates a need. Concerns were expressed that facilities can sometimes be identified during planning stages but subsequently omitted or delayed during implementation.

Some submissions seek assurance that the outcomes of the assessments will translate into tangible infrastructure delivery rather than remaining aspirational.

Infrastructure Led Development

Several submissions support MA17.2 because it promotes an infrastructure-first and plan-led approach to development. Submitters argue that significant residential development should not proceed without a clear understanding of future infrastructure requirements and delivery mechanisms.

Residents and community groups consider that assessing service requirements in advance will help avoid existing issues experienced in growing communities, where housing delivery has outpaced infrastructure provision.

Public Transport

A number of submissions support the investigation of additional public transport infrastructure, including

future rezoning to serve housing growth requirements. In this regard, it is intended to engage with relevant stakeholders, including the landowner/s, as part of that process. It is considered that the SLO is appropriate as written to deliver on plan-led development in a timely manner.

Public Transport

The Council notes the submissions related to public transport and is satisfied that the Cork-Dublin railway, as well as the planned DART+SW programme, alongside this SLO (railway station) and the SLO proposed in MA17.1 will appropriately ensure that requisite public transport is planned for with regard to the SDA lands. It is noted that the NTA has indicated no significant concerns with MA17.2.

DAU

The Council notes the submission from the DAU from the DHLGH with regard to the presence of a recorded monument on the land. Consideration of same will form part of the wider study of the lands and will inform more detailed design within the lands at the appropriate stage.

Conclusion

Include the proposed SLO outlined in the MA 17.2 as part of the variation for the proposed Strategic Development Area.

the potential need for a new rail station and wider transport improvements.

Some submitters argue that major transport infrastructure should be operational prior to large-scale residential development and consider transport planning essential given existing deficiencies in public transport provision and increasing demand resulting from future growth, much of this overlaps with MA 17.1 and associated SLO.

Landowner Submission

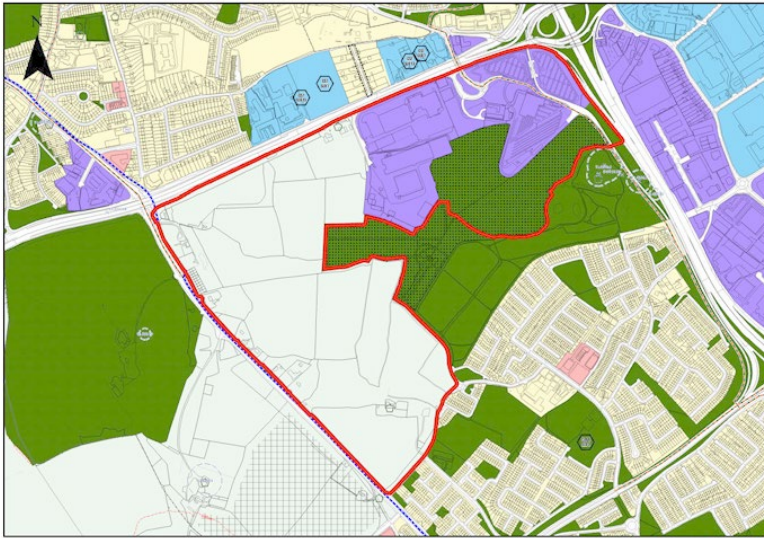
A submission was received from Cairn Homes Plc and the Crowley Family, which broadly supports the strategic importance of Adamstown South and West (Outer) and its designation as a Future Strategic Development Area. The submission supports the principle of undertaking strategic transport, infrastructure, community planning and masterplanning studies to inform the future development of the area. However, Cairn argues that MA17.2 should be strengthened to provide a clearer and more time-bound commitment to progressing these assessments during the lifetime of the current Development Plan. The submission contends that the Future SDA designation should function as an 'active planning mechanism' that advances evidence gathering, infrastructure planning and masterplanning in the near term rather than deferring investigations to a future Development Plan review.

While no submissions opposed the objectives of MA17.2, Cairn's principal concern was that the proposed SLO lacks sufficient certainty regarding the timing and progression of the required studies. The submission seeks stronger commitments to commence transport, infrastructure and social planning assessments at an earlier stage and to provide greater clarity regarding delivery timelines. DAU – DHLGH The DAU provided a submission which outlined the presence of a recorded monument on the lands. NTA With regard to MA 17.2 (Adamstown South and West), the NTA has reviewed the proposed Material Alteration and does not have any significant concerns.	
CE Recommendation To make the Variation with MA17.2 through the inclusion of CS3 SLO4 on the lands at Adamstown South and West (Outer) to be reflected in the Written Statement under Policy CS3 of Variation no. 2 to the South Dublin County Development Plan 2022-2028.	

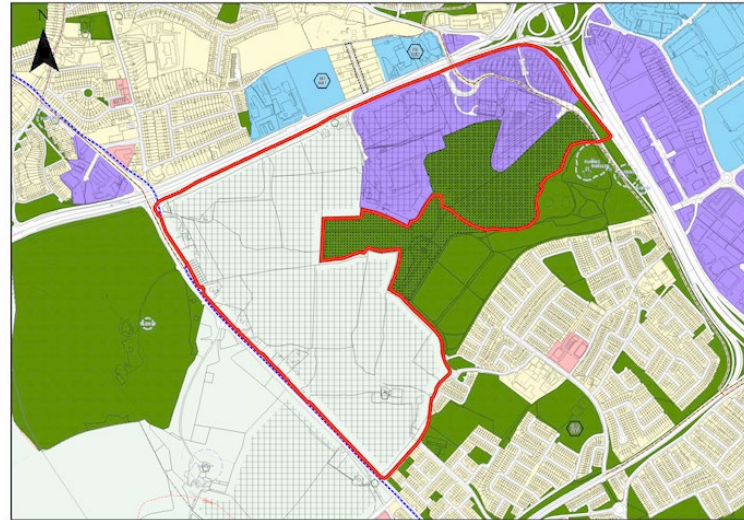
MA19.1

Amendment Ref. No. 19 Newlands (Book of Maps)

To omit Amendment Ref. No. 19 (See Book of Maps)



Amendment Proposed



Variation as Published

Submission No.

[SD-C431-84 William Lavelle](#)

[SD-C431-166 Transport Infrastructure
Ireland](#)

[SD-C431-263 Hibernia Real Estate
Group Limited](#)

[SD-C431-574 South Dublin
Conservation Society](#)

Summary

CE Response

Future SDAs A submission from Hibernia Reit (a landowner) objects to MA19.1 and seeks the reinstatement of the proposed Future Strategic Development Area (Future SDA) designation on lands at Newlands Farm. The submission notes that the Chief Executive's Report on Proposed Variation No. 2 recommended the inclusion of the Future SDA designation, having regard to the NPF Implementation: Housing Growth Requirements Guidelines (2025), the need to plan for longer-term housing growth beyond the current Development Plan period, the need to provide strategic direction for future development locations and the location of the lands within the Dublin City and Suburbs settlement area. It is submitted that these considerations remain valid and that the Future SDA designation should be retained. The submission states that the proposed Future SDA designation would not constitute a rezoning of the lands, would not facilitate residential development and would not prejudice the plan-led process. It is submitted that the designation would simply allow the preparatory studies, infrastructure assessments and strategic planning work envisaged under Policy CS3 to progress in advance of the next Development Plan review. The submission further states that retaining the designation would not diminish the Council's role in determining the future use, scale, form or phasing of development on the lands.	The Planning Authority notes the submission for and the submission against MA19.1 while also noting a submission which supported 'Amendment 42'. It is noted that while a significant element of the lands within the study area are in the ownership of Hibernia Reit, the study area identified within the Variation also includes lands at the Red Cow Luas, employment zoned lands owned by the local authority and lands owned by others. It is noted that TII had no further observations on any of the MAs. Long Term Housing Needs and Future SDAs The <i>NPF Implementation: Housing Growth Requirements Guidelines</i> (2025) set housing growth requirements to 2040 and requested planning authorities to consider the long-term needs of the county for the remaining period of the current County Development Plan (CDP) and the lifespan of the new 10-year development plan. The Variation process identified lands with the capacity to accommodate the targets for the remaining period of the CDP. In terms of long-term lands, the Council has significant experience in the delivery of strategic lands for housing and other uses. Having regard to this experience and knowing the time it can take to co-ordinate and plan lands which are capable of delivering housing and other land uses at scale, the Chief Executive recommended Future Strategic Long-Term Development Areas (Future SDA). This gives clear strategic direction for the county and enables the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for the release of such lands to deliver the housing targets as the need arises in the 2030s.
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The submission highlights the strategic location of the lands in the context of transport-orientated development, stating that the site lies within walking distance of the Red Cow, Kingswood and Belgard Luas stops and is served by existing and proposed BusConnects services. It is submitted that few undeveloped landholdings of this scale within the Greater Dublin Area benefit from a comparable level of public transport accessibility and that the lands are particularly well suited to compact and sustainable growth objectives

The submission states that the lands are capable of accommodating a significant quantum of public open space and community infrastructure. Reference is made to a masterplan emerging from their work for the lands which includes approximately 17 hectares of public open space, representing approximately 30% of the landholding, together with an extension to Ballymount Park, walking and cycling routes, community allotments, wildlife corridors and biodiversity enhancement measures. It is submitted that the lands have the potential to provide a substantial new public park and green corridor linking the M50 and Belgard Road.

The submission further states that the lands are held within a single ownership, which is considered to facilitate the comprehensive planning and delivery of future development. It is submitted that a single

The Future SDA designation proposed under Variation No. 2 for Newlands is not a rezoning of the lands and would not at this time, deliver residential or other development. Rather, it identified strategically located lands with the potential to contribute towards the long-term housing and land use requirements of the County beyond the lifetime of the current Development Plan while providing sufficient lead-in time for the detailed analysis, environmental assessments and infrastructure requirements necessary to support a sustainable future plan-led approach.

The strategic location of the lands at Newlands, lying alongside the M50, within Dublin City and Suburbs and including significant public transport infrastructure in the form of the Luas and the Red Cow transport hub, presents an exceptional opportunity to align with the principles of transport and land use integration and to meet the requirements of government policy on compact growth and NPO8 of the revised NPF to:

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

The policy included for the SDA lands in the Variation under Policy CS3, includes for preparatory studies to examine existing land uses and ecological sensitivities to inform the preparation of future proposals for rezoning. CS3 Objective 1 makes clear that the exact lands to be brought forward as future rezoning may change according to the outcome of these studies. In addition, CS3 Objective 3 states:

ownership structure would assist in delivering a coordinated, phased and plan-led approach to any future development proposals.

In response to concerns raised by Elected Members during consideration of Motion 169, the submission addresses issues relating to biodiversity, protected species, green infrastructure, wetlands and flood risk. Reference is made to ecological survey work previously undertaken on the lands, which identified mature woodland, hedgerows, treelines and riparian corridors as the principal ecological features. The submission states that any future studies required under Policy CS3 would further assess ecological issues and that future master planning could retain and enhance important biodiversity assets. The submission also states that the lands are primarily privately owned agricultural lands and are not publicly accessible.

The submission also states that the planning context has changed since the adoption of the South Dublin County Development Plan 2022-2028, citing the publication of the revised National Planning Framework and the Housing Growth Requirement Guidelines. It is submitted that the recommendation of the Chief Executive to identify the lands as a Future SDA reflects this revised policy context and the need to consider long-term housing requirements beyond the current Development Plan period.

To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.

Therefore, the identification of future SDA lands within the Variation provides for the lead in time necessary to fully consider the capacity of the lands so that they can best contribute to the future development of the County. This will facilitate appropriately addressing ecological, environmental, infrastructure and community considerations. The designation of the SDA would facilitate a comprehensive plan-led and sustainable approach to future development.

Conclusion

Having regard to the strategic planning function of lands identified in the Variation as future strategic long term development areas, and in the context of the revised national policy, the clear need to plan for housing and associated land use requirements beyond the current Development Plan period, and the role of Policy CS3 in ensuring a structured and evidence-based approach to plan making, it is considered that the rationale underpinning the original proposed Variation remains valid.

The omission of Newlands as a Future SDA, located alongside the M50 in a highly accessible location within Dublin City and Suburbs, would

The submission further considers transport and servicing matters, stating that concerns regarding Luas capacity, infrastructure requirements and future transport demand are matters that would be appropriately examined through the preparatory studies, including transport assessments, provided for under Policy CS3. It is submitted that the Future SDA designation would facilitate these assessments and allow future decisions regarding the lands to be informed by detailed evidence.

Reference is also made to the potential restoration and reuse of Katharine Tynan House and other protected structures on the site, together with the provision of sports facilities, community infrastructure, heritage and cultural uses, and extensive public open space as part of a future master planning framework. The submission states that the Future SDA designation would provide the mechanism through which these opportunities could be explored through a Council-led planning process.

A separate submission supports MA19.1 and the omission of Amendment Ref. No. 19 from Proposed Variation No. 2 and supports the decision of the Elected Members not to proceed with the proposed Future SDA designation for the subject lands.

A further submission indicated support for Amendment 42 but did not indicate which MA was

remove an important strategic planning mechanism intended to support the sustainable long-term planning of the County.

It is considered that Newlands, alongside Adamstown South and West (Outer), represents a sustainable approach to strategic long term development in the county and it is critically important that the lead in time required to ensure a fully considered and co-ordinated plan led approach to development is provided for through both SDAs if targets up to 2040 are to be delivered.

being referred to. However, MA42.1 and 42.2 both reference the removal of Newlands in the Written Statement while MA42.3 and 42.4 reference objectives in the written statement related to the SDAs. TII had no further observations to make.	
CE Recommendation To make the Variation without Material Alteration 19.1, and as such to retain the current zoning Objectives ‘RU’, ‘EE’, and ‘OS’ and to designate the lands at Newlands, to a 'Future Strategic Long-Term Development Area' (Future SDA), as proposed in the draft Variation.	

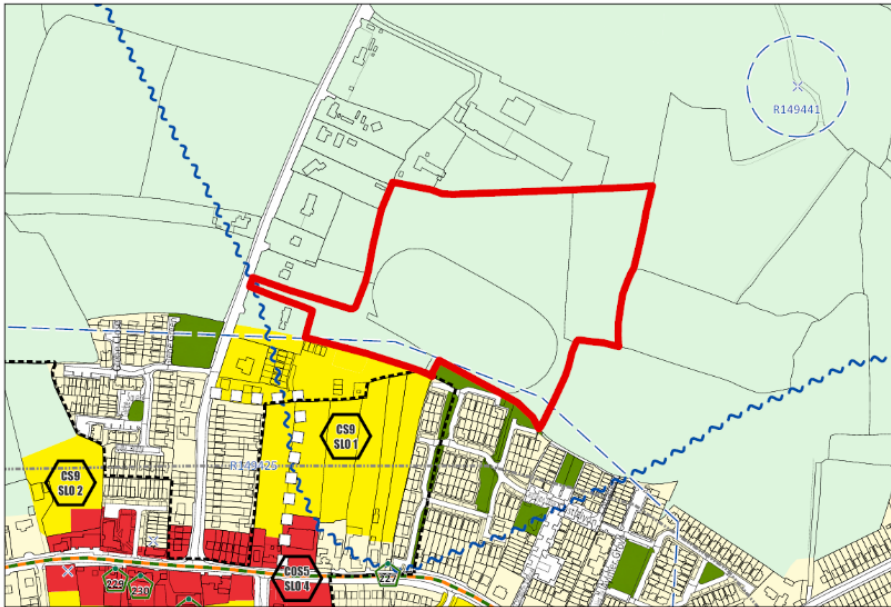
MA42.3	
Amendment Ref. No. 17, 18, 20 (Book of Maps) Amendment Ref. No. 42 (Written Statement)	
CDP Section(s)	Page(s)
2.6.1 Land Capacity Study	48
To amend CS3 Objective 3 under Policy CS3, as follows: CS3 Objective 3: To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery, including investigating the feasibility of providing a minimum of 20% of units as fully accessible and identifying a unit target to be designed for specialist housing units in accordance with the relevant SDCC Housing Delivery Action Plan, with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.	
Submission No. SD-C431-84 William Lavelle	
Summary	CE Response
A submission indicated support for 'Amendment 42' but did not indicate which MA was being referred to. However, MA42.1 and 42.2 both reference the removal of Newlands in the Written Statement while MA42.3 and 42.4 reference objectives in the written statement related to the broader policy for the	The Planning Authority notes the supporting comments with regards to the MA.

Future Long-Term Strategic Development Areas (SDAs).	
CE Recommendation To make the Variation with MA42.3 as follows: CS3 Objective 3: To ensure development of Future SDAs (subject to rezoning) for residential and other uses will be in accordance with an approved plan-led approach, such as a Priority Area Plan or otherwise equivalent appropriate mechanism, which will align housing delivery, including investigating the feasibility of providing a minimum of 20% of units as fully accessible and identifying a unit target to be designed for specialist housing units in accordance with the relevant SDCC Housing Delivery Action Plan, with, inter alia, climate action objectives, supporting infrastructure, sustainable transport options, educational and community facilities, public open space, green infrastructure networks, cultural heritage and no net loss of important ecological features as surveyed, identified and mapped by a qualified ecologist.	

MA42.4	
Amendment Ref. No. 17, 18, 20 (Book of Maps) Amendment Ref. No. 42 (Written Statement)	
Section(s)	Page(s)
2.6.1 Land Capacity Study	48
To insert a new objective under Policy CS3: Future Strategic Long-Term Development Areas, as follows: CS3 Objective 4: To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.	
Submission No. SD-C431-84 William Lavelle	
Summary	CE Response
A submission indicated support for ‘Amendment 42’ but did not indicate which MA was being referred to. However, MA42.1 and 42.2 both reference the removal of Newlands in the Written Statement while MA42.3 and 42.4 reference objectives in the written statement related to the broader policy for the Future Long-Term Strategic Development Areas (SDAs).	The Planning Authority notes the supporting comments with regards to the MA.
CE Recommendation To make the Variation with MA42.4 to insert a new objective under Policy CS3 as follows:	

CS3 Objective 4:

To include an Area-Based Transport Assessments (ABTA) in cooperation with the NTA and Transport Infrastructure Ireland (TII) as part of the plan-led approach to Future SDAs.

MA65.1	
Amendment Ref. No. N/A (See Book of Maps)	
CDP Section(s)	Page(s)
Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town	76
 To rezone lands at Cornerpark (Haughans Field), Newcastle from Rural (RU) to New Residential (RES-N) and include a new Specific Local Objective (CS9 SLO6) as follows: CS9 SLO6: No development shall commence until a masterplan has been agreed with the planning authority showing how approximately 2 ha maximum of land within the RES zoning will be integrated as part of housing development to deliver a sports centre / facility for local sports club including pitch, clubhouse and training pitches.	

Submission No.		
SD-C431-3 Cllr Francis Timmons	SD-C431-270 Alanna Homes Limited	SD-C431-283 Ciara Walsh
SD-C431-284 Ian O'Connor	SD-C431-285 Sarah Campbell	SD-C431-286 Glenn Loughran
SD-C431-287 David Beckett	SD-C431-288 DEAN PEEL	SD-C431-291 Katie Thompson
SD-C431-293 Teresa Moyles	SD-C431-294 Fiona Braiden	SD-C431-296 David Kershaw
SD-C431-298 Lesley Tilly	SD-C431-302 Mark Okeeffe	SD-C431-304 Michelle Okeeffe
SD-C431-307 Fiona Braiden	SD-C431-308 Shelley Cronin	SD-C431-312 Sarah Byrne
SD-C431-313 Nicola Patton	SD-C431-350 Moira Mullally	SD-C431-351 Vivian Mullally
SD-C431-355 Labake Taiwo	SD-C431-372 Ken Tougher	SD-C431-382 LORI CLARKE
SD-C431-386 Gavin Jones	SD-C431-395 Duc Quy Dang	SD-C431-398 John Devlin
SD-C431-433 Jean Martin	SD-C431-464 Development Applications Unit	SD-C431-416 Department of Defence
SD-C431-439 Department of Education and Youth		
Summary		
Submissions were received from individual residents, elected representatives, and on behalf of the Peamount United FC in relation to the material alteration to rezone land at Cornerpark (Haughan's Field) at Alymer Road in Newcastle as New Residential 'RES-N'. The submissions support the material alteration to rezone the lands.		
Zoning		
Submissions generally express their support for the residential use specifically in tandem to the development of sporting facilities.		
The Department of Defence submission highlights the importance of safeguarding the long-term operational capability of Casement Aerodrome when		
CE Response		
MA 65.1 - Cornerpark, Newcastle Amendment no. 65.1 proposed at Cornerpark (Haughan's Field) at Alymer Road in Newcastle proposes to change 2.8ha (c.7 acres) of land from Objective Rural 'RU' to Objective New Residential 'RES-N' and to include an associated SLO as follows:		
CS9 SLO6 <i>No development shall commence until a masterplan has been agreed with the planning authority showing how approximately 2 ha maximum of land within the RES zoning will be integrated as part of housing development to deliver a sports centre / facility for local sports club including pitch, clubhouse and training pitches.</i>		
Submissions have expressed their general support for the rezoning of Cornerpark (Haughan's Field), most of which specifically emphasise		

considering future development in the Grange Castle, Citywest, Newcastle and Adamstown areas. It notes that any increase in building heights or population density could affect the approach and departure paths associated with Runway 22 and Runway 04, potentially impacting aviation safety and operations. Concern is raised in relation to Runway 10/28, the aerodrome's longest runway, which is essential for larger aircraft operations, including maritime patrol aircraft, ministerial air transport and foreign state flights. The submission emphasises that development which penetrates protected airspace surfaces or increases risk within designated Public Safety Zones could result in operational restrictions, the loss of instrument procedures, reduced runway availability and, ultimately, a reduction in critical aviation capability. Accordingly, it seeks to ensure that future zoning decisions, building height policies and development proposals remain compatible with the aerodrome's operational requirements, and that any development in close proximity to Casement Aerodrome is appropriately assessed for its potential impact on flight operations.

Sporting Facilities

Many submissions comment on their specific support for the inclusion of sport facilities to be developed in tandem to the residential development, as it is noted an upgrade in facilities for Peamount United FC is needed, particularly an all-weather pitch.

their support for the associated facilities (SLO) that are to be developed in tandem with residential development.

The submission from the Department of Defence is noted and it is recognised that the site is within certain airport constraints. Policy and objectives relating to Casement Aerodrome (Policy IE9) and to proposed development within the various aviation constraints are included in the County Development Plan (CDP). While this zoning is not recommended by the CE, should it be retained by the elected members, these objectives will be considered as part of the preparation of the required masterplan process outlined in the SLO and will also inform any assessment of planning applications which fall within the different aviation constraints. It is also noted that planning applications are referred to the Department of Defence, where relevant, and their submissions considered as part of the assessment of development.

In terms of the SLO language proposed by Councillor Timmons, it is noted that the wording requested matches the wording agreed by the Councillors at the Special Council Meeting in June, published as MA65.1 and outlined above.

Department of Education and Youth

The further submission from the Department is noted. The Planning Authority will continue to engage with the Department on the delivery of schools, noting that Amendment no. 1, Ballynakelly provides for the reservation of a school site.

Zone of Notification for Recorded Monuments

The Department's observations regarding the presence of recorded monuments and the need to have regard to statutory protections and relevant heritage policies are acknowledged.

Submissions note that an update of facilities will support the club's growing membership, particularly amongst younger players. Past conditions of the current pitch are cited as justification to as why an all-weather pitch should be included in the development.

It should be noted that the submission from Alanna Homes appears to be a submission from Peamount United FC, who express their support for CS9 SLO6 as they have used the lands at Cornerpark for a number of decades and the proposed zoning of the lands provides an opportunity to develop a Centre of Excellence by providing both a full-size all-weather pitch and a training pitch together with supporting facilities.

Councillor Timmons asserts that he supports the proposal on behalf of Peamount United FC, St. Finians GAA, Newcastle Cricket Club and other Newcastle sporting groups that will benefit from this rezoning. The submission requests language for the Specific Local Objective (CS9 SLO6).

A submission raises a question as to whether the introduction of the lands at Cornerpark and Elmcastle through the Material Alteration provides an equivalent planning response to the strategy recommended by the Chief Executive.

Department of Education and Youth

The South Dublin County Development Plan 2022-2028, as recognised in the submission, has policy and related objectives within it under Policy NCBH13 which states:

Manage development in a manner that protects and conserves the archaeological heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.

It is also noted that the proposed Material Alterations for Haughan's Field will be subject to the preparation of a Masterplan, which are considered an appropriate mechanism through which archaeological and cultural heritage considerations can be comprehensively assessed and integrated into the future planning and development of these areas having regard to the archaeological policies and objectives of the South Dublin County Development Plan 2022-2028 and the requirements of relevant legislation.

Conclusion

It is noted that submissions are in general support of the proposed rezoning and the associated development of sports pitches (SLO). However, the Chief Executive undertook a robust evidence-based assessment process to identify lands which are considered to have the capacity and best suited to deliver the revised housing targets. It remains the view of the Chief Executive that the lands proposed in the draft Variation are the preferred lands to deliver on the targets, noting that the lands subject to this material alteration will not have the capacity to replace any lands already identified. It is recommended that the revised housing requirement are met through the lands identified in the Variation without requiring additional lands at this location.

The Department notes the increase in potential units in Newcastle and refers to their submission to the proposed Variation in March 2026 noting that the proposed amendment (sic) does not result in change to the submission which stated:

“ These projected figures could see an increase in primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required. In the context of post primary provision, the projected growth figures could see a significant increase in post primary school place demand, which potentially could be accommodated within existing post primary schools and current capital projects.”

DHLGH

The Department highlighted that the site at Haughan’s Field is partially located in the Zone of Notification for the Recorded Monument listed in the RMP as DU021-017---Village. It is advised that any rezoning proposals should be fully cognisant of the statutory protections afforded to these sites and the archaeological policies and objectives of the South Dublin County Development Plan 2022-2028. The submission recommended that archaeological and cultural heritage considerations be carefully integrated into the assessment and implementation of the proposed alterations.

CE Recommendation

To make the Variation **without** Material Alteration 65.1 and to retain the current 'RU' zoning on the lands at Cornerpark (Haughan's Field), Newcastle.

Bulk Purchase SLO

SLO Bulk Purchase Wording:

No bulk purchases of residential units developed on these lands shall be permitted, with the exception of acquisitions by the County Council or AHBs for the purposes of meeting its statutory housing functions. Residential units shall otherwise be sold only to individual private purchasers, and this requirement shall be included as a condition of any planning permission granted.

This wording is contained in the following Material Alterations:

- MA1.2 – Ballynakelly
- MA2.2 – Adamstown SDZ West
- MA4.2 – Tubber Lane North
- MA5.2 – Citywest
- MA 7.3 – Edmondstown
- MA8.1 – Kiltipper Road
- MA9.2 – Knockmeenagh
- MA10.1 – Stonewall
- MA12.1 – Cherryfield
- MA13.1 – Rathcoole
- MA14.2 – Foxhunter
- MA15.1 – Ninth Lock Road

Submission No.

[SD-C431-100 Kelland Homes](#)

[SD-C431-136 Eileen Dennehy](#)

[SD-C431-162 Land Development Agency](#)

[SD-C431-261 Stephen Little and Associates on behalf of Lydon](#)

[SD-C431-360 Donal Curran](#)

[SD-C431-367 Hermitage Park](#)

SD-C431-401 Cairn Homes Plc. SD-C431-566 Saggart Village Residents' Association SD-C431-562 Luke Heffernan		SD-C431-467 Evara Developments Ltd SD-C431-365 Caroline O'Brien SD-C431-563 Caroline Carney	SD-C431-488 Office of the Planning Regulator SD-C431-366 John O'Brien
Summary		CE Response	
Office of the Planning Regulator The OPR considers that proposed blanket restrictions on bulk purchases of residential units would extend beyond the scope of the relevant <i>Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities</i> (2021) and introduces a further constraint on the Planning Authority's capacity to deliver housing consistent with the NPF and Housing Growth Guidelines. The current guidelines provide for such controls through planning conditions and agreements at the development management stage and the introduction of the SLO could unduly constrain the delivery of apartments. These amendments therefore introduce a further constraint on the Planning Authority's capacity to deliver housing consistent with the NPF and Housing Growth Guidelines. In this regard the OPR has made MA Recommendation 2 – that the Planning Authority makes the proposed Variation without the bulk purchase MAs (see section 2 of this CE Report).		An SLO relating to bulk purchase of residential units was agreed by Members at the Special Council meetings in June 2026 on lands subject to the Variation, as identified above. Given that all of these material amendments contain the same wording, shown in bold above, on the different lands they are being dealt with together. The <i>Regulation of Commercial Institutional Investment in Housing Guidelines for Planning Authorities</i> (May 2021 Section 28 of the Planning and Development Act 2000) was published by the Department of Housing, Local Government and Heritage in response to commercial institutional investors bulk-purchasing houses and duplex units. The Guidelines were originally issued in May 2021 and subsequently updated in July 2023 removing reference to Build-To-Rent (BTR) exemptions to reflect the removal of the specific BTR design criteria (SPPR7 and SPRR8) in December 2022. It was further highlighted in the accompanying Circular to the amended Guidelines NRUP 01/2023 that apartments continue to be excluded from the requirements set out within the Guidelines. The guidelines set out planning conditions that may be tailored to address the issue of bulk purchase by commercial institutional investment subject to the nature of the planning application, to which planning authorities and An Coimisiún Pleanála must have regard. This would ensure developments are not bulk-purchased for market rental	
Land Development Agency (LDA)			

The Agency supports Variation No.2 and its alignment with the <i>National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities; Planning Design Standards for Apartments, Guidelines for Planning Authorities, July 2025</i> and; <i>Sustainable Residential Development and Compact Settlement Guidelines</i> (2024). The variation aims of ensuring key sites come forward to support the delivery of compact, infrastructure-led development are supported. The LDA notes a pipeline of 10,000 direct delivery homes and a delivery target of at least 8,000 Project Tosaigh homes by 2028. Project Tosaigh is a government initiative, whereby the LDA steps in to facilitate the completion of stalled or unviable housing projects that may involve the acquisition of residential blocks within developments. The completed homes are then owned by the LDA and made available as cost rental to eligible tenants or sold by the LDA in partnership with local authorities through the Starter Home Purchase Scheme. The LDA would like to remove any unintended barriers, uncertainties or delivery risks that might adversely affect the LDA's ability to deliver housing, including much needed affordable and social housing, within South Dublin in the coming years. It is requested that the Council include the 'LDA' within the wording of the SLO on the different sites. This would enable the Agency to deliver on its mandate and function, including purchasing, acquiring or	purposes by commercial institutional investors in a manner that causes the displacement of individual purchasers and/or social and affordable housing including cost rental housing. On this basis, the local authority imposes planning conditions on planning permissions on a site by site basis ensuring the applicant or any person with an interest in the land shall enter into an agreement with the planning authority that restricts all houses and duplex units permitted, to first occupation by individual purchasers i.e. those not being a corporate entity, and/or by those eligible for the occupation of social and/or affordable housing, including cost rental housing. The current wording for the SLO refers to residential units, implying all residential properties including apartments are included. The guidelines published by the Department of Housing, Local Government and Heritage specifically applies to houses and duplex. As such, apartments are excluded from these guidelines as a measure to support investment in delivery of high density apartment developments and to ensure these development types remain viable. Houses and duplexes are defined as follows: • <u>A house</u>, defined as not including a building designed for use or used as two or more dwellings or a flat, an apartment or other dwelling within such a building. • <u>A duplex unit</u>, defined as a dwelling within a building designed for use as two individual dwellings and/or on one shared plot, with separate entrances. The inclusion of the Land Development Agency within the list of exempt bodies would not address the fundamental concern with the proposed SLO. The issue is not the identity of exempt purchasers but
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working in partnership to secure residential units as relevant at scale. The LDA requests the following wording: <i>No bulk purchases of residential units developed on these lands shall be permitted, with the exception of acquisitions by the County Council or the LDA or AHBs for the purposes of meeting its statutory housing functions. Residential units shall otherwise be sold only to individual private purchasers, and this requirement shall be included as a condition of any planning permission granted.</i> This request is seeking to ensure the LDA performs its function as set out in Section 14(h-i), Section 14(j) and Section 14(o) of the Land Agency Development Act 2021, in accordance with National Policy Objectives 21 and 43. Stephen Little and Associates, Citywest A submission was made by Stephen Little and Associates on behalf of Lydon for their lands at Citywest welcoming the publication of Variation No.2 of the Development Plan 2022-2028. The submission is not in support of CS8 SLO3 (MA5.2) as it is contrary to current national planning policy. The <i>Regulation of Commercial Institutional Investment in Housing: Guidelines for Planning Authorities 2023</i> were issued under section 28 of the Planning and	rather that the proposed restriction applies to all residential units, including apartments, and therefore extends beyond the scope of the national policy framework and associated Section 28 Guidelines. Further to this, the Office of the Planning Regulator (OPR) considers the proposed blanket restrictions on bulk purchases of residential units extends beyond the scope of the relevant Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities (2021) and introduces a further constraint on the Planning Authority's capacity to deliver housing consistent with the NPF and Housing Growth Guidelines, whilst unduly constraining the delivery of apartments. In this regard, the OPR has made the following recommendation: While having regard to the delivery of housing and having considered: • NPO42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040. • NPO43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development. • The NPF Implementation: Housing Growth Requirements (2025). • The Regulation of Commercial Institutional Investment in Housing – Guidelines for Planning Authorities (2021). The OPR recommends that the Planning Authority makes the proposed Variation without the material alterations on bulk purchasing. In relation to a submission concerning any relationship between CS8 SLO2 in Citywest and CS8 SLO3 (bulk purchase, Citywest), there will be no weakening of CS8 SLO2 should CS8 SLO3 be removed. It is
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Development Act and are therefore statutory planning guidelines.

These guidelines are directed towards preventing the bulk purchase of own-door houses and duplex units, ensuring that houses and duplexes in lower density developments are not bulk purchased by commercial institutional investors to the exclusion of individual purchasers. There is no equivalent policy within the Guidelines requiring restriction on the bulk purchase of apartment units. The circular letter that accompanied the amended guidelines highlight the following:

"...there is no longer a planning policy rationale for excluding BTR applications from appropriate planning conditions prohibiting bulk purchasing of new houses and duplex units. Apartments continue to be excluded from the requirements set out within these Guidelines."

There is flexibility in relation to apartment ownership and tenure to support investment in apartment delivery, to ensure high density urban development remains viable. Section 2.2 of the Apartment Guidelines (2025) acknowledges that viability presents an ongoing challenge to apartment delivery. *Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness* supports the delivery of a wide range of residential buildings and tenures.

noted that the Cairn Homes submission raising concerns at the SLO related to Adamstown South and West (Outer). Those lands did not include this SLO (see section 3.4 of this report for further detail).

Conclusion

The proposed SLOs are not supported by the Chief Executive.

The inclusion of the proposed SLO on lands within South Dublin County will significantly impact the ability of the Council to achieve the targets set out in the NPF and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities*. They will also negatively impact on the ability of the planning authority to meet the appropriate densities set out under the *Sustainable Residential and Compact Settlement Guidelines* in addition to being contrary to the clear intent and focus of the *Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities* (2021, as amended). These latter guidelines already provide an appropriate mechanism, through the inclusion of planning conditions for houses and duplex, to ensure that individuals are not shut out of the housing market by bulk buying by corporate entities.

Having regard to the above, and to the OPR Recommendation, the MAs relating to bulk purchasing are not supported by the CE, given that the appropriate national policy and Section 28 planning guidelines which set out templates for relevant planning conditions, which are implemented by SDCC at the local level, are in place to manage any potential bulk-buying of houses and duplex.

The current wording incorporates a blanket injunction to all residential units, including apartments which disregards the clear distinction drawn by the Minister between own-door housing and apartment developments. Accordingly, CS8 SLO3 should be amended to align with the *Regulation of Commercial Institutional Investment in Housing –Guidelines for Planning Authorities (2023)*.

Armstrong Fenton, Kiltipper

A submission was made by Armstrong Fenton on behalf of Kelland Homes Ltd for their lands at Kiltipper. The submission supports the rezoning of the lands. However, the inclusion of CS7 SLO13 on bulk purchase is considered to be in complete conflict with the current *Guidelines on the Regulation of Commercial Institutional Investment in Housing*, issued as Section 28 Ministerial Guidelines in 2023, and is therefore not required. It is further stated that the Guidelines set out two alternative planning conditions that planning authorities and An Coimisiún Pleanála shall have regard to in granting planning permission for new residential development including houses and/or duplex units.

The submission refers to the following set out in the Guidelines:

“this is intended to ensure that own-door housing units and duplex units in lower density housing

developments are not bulk-purchased for market rental purposes by commercial institutional investors in a manner that causes the displacement of individual purchasers and/or social and affordable housing including cost rental housing”.

The Guidelines provide wording for planning conditions. The Guideline definitions associated with a house and duplex are referred to in the submission. It is further stated that the appropriate restrictions are currently in place to ensure adequate home ownership is provided for and that bulk purchasing of new dwellings is restricted, therefore the SLO should be omitted. It is highlighted that the wording of the SLO is vague referring to “residential units” as this would not comply with the guidelines which refers to houses and duplex units. The proposed SLO can be interpreted as applying to apartments which is in direct conflict with the existing Guidelines and would have impact on the viability of housing schemes. It is requested that it is omitted.

Evora, Adamstown SDZ West

Evora considers that the matters addressed by CS7 SLO13 (MA2.2) for Adamstown SDZ West are already appropriately regulated through the *Regulation of Commercial Institutional Investment in Housing: Guidelines for Planning Authorities 2023*, issued under Section 28 of the Planning and Development Act. It is noted that there is no equivalent policy within the Guidelines requiring or encouraging

restrictions on the bulk purchase of apartment units. Reference is made to Circular Letter NRUP 01/2023 which accompanied the amended 2023 Guidelines confirming that apartments continue to be excluded from the requirements within the Guidelines. Reference is also made to the original 2021 Guidelines in which it was indicated that flexibility in relation to apartment ownership and tenure was intentionally retained to support investment in apartment delivery, quoting:

“This level of flexibility is considered necessary to facilitate broad investment in the delivery of increased housing supply, which remains critical. It therefore continues to apply to all apartment development, in order to ensure that undertaking such development remains viable, especially higher density schemes in established urban areas...”

Evora states that they work closely with AHBs, State bodies and private and institutional investors to deliver a range of housing tenures. Sales with these organisations would not proceed with this SLO in place. It is therefore important that local policy does not inadvertently restrict transactions that would otherwise be available in an open market and that Evora can deliver a range of tenures including private and cost rental (facilitating employees with a household income of up to €66,000). It is recommended to remove the SLO (CS7 SLO13).

Other Issues

A submission highlights that the landowner's request concerning CS8 SLO3 at Citywest and bulk purchasing should not be used as a basis for weakening any part of CS8 SLO2 on the same lands or the community and environmental protections sought for the lands. A number of submissions are also in support of the inclusion of the bulk purchase SLO on a number of the relevant SLOs.

It is noted that Cairn Homes raised concerns at the bulk purchase SLO.

CE Recommendation

To make the Variation **without** MA1.2; MA2.2; MA4.2; MA5.2; MA7.3; MA8.1; MA9.2; MA10.1; MA12.1; MA13.1; MA14.2; and MA15.1 relating to bulk purchase.

3.2 Prescribed and Other Bodies - General Comments

This section outlines more general comments made by prescribed and other bodies as part of their submission. Those parts of submissions which related directly to a Material Alteration are summarised and responded to in Section 3.1 of this report, within the relevant MA reference and associated recommendation. The responses are for reference only and no CE Recommendation is included in this section of the report.

Submission No. SD-C431-10 The Maritime Area Regulatory Authority (MARA) SD-C431-166 Transport Infrastructure Ireland SD-C431-439 Department of Education and Youth SD-C431-97 EPA SD-C431-277 Office of Public Works SD-C431-457 Irish Water SD-C431-162 Land Development Agency SD-C431-416 Department of Defence SD-C431-464 Development Applications Unit		
Summary	CE Response	
Department of Defence The submission includes a number of attachments including a submission made to the County Development Plan in 2021 and a technical safeguarding report. Observations are made relating to the zoning of lands where they lie within the vicinity of Casement Aerodrome and the safeguarding requirements within the related airspace, particularly Grange Castle, Citywest, Newcastle and Adamstown areas. It is indicated that the proposed expansion at Grange Castle raises particular concern as it extends significantly closer to the approach to Runway 22 and the associated Public Safety Zones. The Air Corps recommends that the area underneath the approach surface for Runway 22 is not rezoned and remains 'green space' to protect the 1370m	Department of Defence The submission from the DoD is welcomed, noting however that no submission was made at the draft Variation stage of the process. The issues identified in this submission regarding the operational protection of Casement, including height are noted. However, the proposed Variation identified Grange Castle lands – Amendment no. 18 - as a future SDA with the requirement to carry out a study of the lands for alternative uses while retaining the golf course. The material alteration MA18.1 clarifies that the golf course is to be retained as a 18 hole municipal course. The detailed design, height and massing of any scheme on the lands, or generally, would evolve through the masterplan engagement with the planning authority and planning application process. At this stage of the process, the matters raised for Grange Castle are out of scope. Similarly, for Citywest, where the lands have	

Red Zone for Runway 22. The submission highlights that future zoning, building height policies and development proposals within the Grange Castle, Citywest, Newcastle and Adamstown areas should remain compatible with the long-term operational requirements of the aerodrome. The Department of Defence and the Air Corps have indicated that they are not opposed to the zoning change of land surrounding Casement Aerodrome as outlined in SDCC Development Plan, Variation No. 2. Rather, it seeks to ensure that SDCC fully recognises and incorporates Casement Aerodrome safeguarding requirements into the planning process. Uisce Éireann The submission from Uisce Éireann had no objection to the changes proposed and no further comments to make. In this regard it welcomes the inclusion of CS7 SLO4 at draft Variation stage. UÉ highlighted the importance of strategic water services planning in supporting future development. The submission recognised South Dublin as a key growth area and stressed the need for ongoing collaboration between the Council, developers and Uisce Éireann to ensure that water services infrastructure is planned, funded and delivered in parallel with future growth. The emphasis was on ensuring that essential utility infrastructure forms part of an integrated and coordinated approach to development.	been agreed to be zoned at the meetings in June and are now only subject to amendments to the SLO. In the case of Ballynakelly and Cornerpark in Newcastle, the Department's submission is responded to in Section 3.1 of this report under the relevant material alteration. Uisce Éireann The submission from Uisce Éireann is noted and welcomed. The Council acknowledges the importance of strategic water services planning in supporting the sustainable growth of South Dublin County Council and recognises the critical role that water and wastewater infrastructure plays in facilitating future development. SDCC will continue to engage proactively with Uisce Éireann to facilitate water services infrastructure throughout the county so that it can be aligned with the phased development of lands. Ongoing collaboration between the Council, Uisce Éireann and other stakeholders will help to support a coordinated and integrated approach to growth, ensuring that essential utility infrastructure is provided in tandem with future development needs. MARA The CE notes the submission from MARA and given no lands in the County are within a maritime area, or the submission relate specifically to an MA, the submission is out of scope. LDA The Chief Executive notes the submission from the Land Development Agency (LDA), including its support for Variation No. 2 and its comments relating to a number of specific Material Alterations. The submission also highlights the important role of
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MARA MARA reviewed the proposed Material Alterations to Variation No. 2 of the South Dublin County Development Plan 2022-2028 and noted that none of the amendments relate to lands within the Maritime Area. Having considered the proposed changes, MARA confirmed that it has no additional comments beyond those contained in its submission of 9 March 2026. MARA also reminded the Planning Authority of its statutory obligation to provide a copy of the adopted variation within one week of its adoption, in accordance with the Planning and Development Act 2024. LDA The Land Development Agency (LDA) expressed overall support for Variation No. 2 and its alignment with national housing policy but raised concerns regarding proposed Specific Local Objectives (SLOs) restricting bulk purchases of residential units. The LDA advised that these restrictions could hinder its ability to deliver affordable and cost-rental housing through initiatives such as Project Tosaigh. The submission requested that the LDA be included, alongside local authorities and Approved Housing Bodies (AHBs), as an exception to the bulk purchase restrictions across a number of proposed material alterations. The LDA argued that this amendment would better support national and local housing delivery objectives and facilitate the provision of affordable and social housing on strategically located lands throughout South Dublin.	the LDA in supporting the delivery of housing nationally, including affordable and cost-rental housing initiatives. The LDAs submission as it relates to the material alterations on bulk purchase is included under the single response to the lands where the SLO is proposed, see Section 3.1. TII It is noted that TII raised no observations or objections in relation to the proposed Material Alterations, having regard to relevant national and regional policy and guidance. The Chief Executive notes the comments from Transport Infrastructure Ireland (TII) and its role in ensuring the protection of the safety, capacity and strategic function of the national road network and the safe operation of the LUAS. Department of Education and Youth The Chief Executive welcomes the submission from the Department of Education and Youth. Comments made that relate to specific material alterations are addressed under the relevant material alteration in Section 3.1 of this report. The Chief Executive welcomes the Department's support for the inclusion of educational capacity considerations within the proposed Material Alterations and its commitment to ongoing engagement with the Council. SDCC will continue to collaborate with the Department of Education and Youth to support the timely planning and delivery of educational infrastructure and to ensure that school capacity requirements are appropriately considered alongside future growth and development across the County.
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TII Transport Infrastructure Ireland (TII) indicates that they have no further comment with regard to the Material Alterations to the proposed Variation to the SDCC CDP. TII seek to address the safety, capacity and strategic function of national roads and the safe operation of the LUAS. Department of Education and Youth The submission welcomed the Council's ongoing engagement on educational planning and confirmed its willingness to continue working with the Council to ensure adequate school provision across the county. The submission included specific comment on certain material alterations. DHLGH The Department highlighted that a number of potential archaeological monuments and recorded monuments occur within, or in close proximity to, lands affected by the proposed Material Alterations. Where these relate to material alterations, they are included under the relevant MA reference in section 3.1 of this report. The Department advises that any rezoning proposals should be fully cognisant of the statutory protections afforded to these sites and the archaeological policies and objectives of the South Dublin County Development Plan 2022-2028. The submission emphasised the need to safeguard both known and previously unidentified	DHLGH The submission from the Department of Housing, Local Government and Heritage (DHLGH), Development Applications Unit (DAU) is noted. The Department's observations regarding the presence of recorded monuments, potential archaeological features and the need to have regard to statutory protections and relevant heritage policies are acknowledged. It is noted that the majority of lands affected by the proposed Material Alterations will be subject to the preparation of Masterplans, which are considered an appropriate mechanism through which archaeological and cultural heritage considerations can be comprehensively assessed and integrated into the future planning and development of these areas. Further to this, the planning application process will facilitate the identification, protection and management of both known and previously unidentified archaeological assets, having regard to the archaeological policies and objectives of the South Dublin County Development Plan 2022-2028 and the requirements of relevant legislation. The matters raised by the Department have been considered in the assessment of the relevant Material Alterations and will continue to inform the planning and development framework for these lands. OPW The submission from the OPW is welcomed and has been dealt with in detail under the Environmental Assessments section of this report, Section 3.3.
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archaeological features and deposits that may be impacted by future development. Overall, the Department recommended that archaeological and cultural heritage considerations be carefully integrated into the assessment and implementation of the proposed alterations. The Department notes the objectives set out in the County Development Plan within Policy NCBH1 and Policy NCBH13. Office of Public Works (OPW) The OPW sets out its role as lead agency for the coordination of an integrated ‘whole-of-Government’ approach to flood risk management in Ireland. The opportunity to comment on the proposed material alterations is welcomed.	
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3.3 Environmental Assessments

Submission No. SD-C431-277 Office of Public Works SD-C431-56 Saggart Community Council SD-C431-97 EPA SD-C431-488 Office of the Planning Regulator	
Summary	CE Response
SEA/AA Environmental Protection Agency The EPA outlines South Dublin County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans. Where further changes to the Draft Variation are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. If the Variation is adopted/made an SEA Statement should be prepared that summaries the following: • How environmental considerations have been integrated into the Variation; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation;	SEA/AA Environmental Protection Agency The Chief Executive notes the submission from the Environmental Protection Agency (EPA) and their observations regarding the importance of integrating environmental considerations into the proposed Variation and Material Alterations and ensuring consistency with the principles of proper planning and sustainable development, climate change mitigation and adaptation, and relevant national, regional and local policy objectives. Environmental considerations have informed the preparation and assessment of the proposed Variation and associated Material Alterations. The EPA's recommendation that any further modifications be screened for potential significant environmental effects is noted and will be addressed, in accordance with the relevant statutory environmental assessment requirements. The preparation of an SEA Statement following the adoption of the Variation will be undertaken as part of the statutory process.

• The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Variation. A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process. The EPA sets out the requirement for consultation with prescribed bodies under the SEA Regulations. MA5.1 Citywest Observations are raised in relation to the SEA and AA Assessment. It is submitted that the SEA screening reasoning should be clarified in respect of Citywest particularly regarding cumulative impacts on education, health care, community infrastructure, recreation, potable water, wastewater and transport. The need for the final AA Screening and final AA Screening Determination to address any final adopted amendments made to MA5.1 is also raised. OPR The OPR submission provides an observation advising to clearly state the conclusion in relation to potential effects on European Sites in the Screening for SEA and AA Report for the MA65.1 and MA66.1.	MA5.1 Citywest Following formal screening of the Proposed Variation No.2, it was determined that a full SEA and AA were required and these processes have been carried out in accordance with the relevant EU Directives and national legislation. The SEA Environmental Report and NIR of Variation No.2 were undertaken in respect of the proposed variation, including the zoning of lands at Citywest. All proposed material alterations to proposed Variation No.2 were evaluated in line with the relevant SEA and AA legislation, noting that the zoning of the lands at Citywest was not a material alteration and that only the SLO attached to the lands was subject to material alterations, many reflecting the recommendations of the SEA. The approach through the SEA and AA in the proposed Variation provides an additional layer of environmental information on the proposed lands which in turn has aimed to provide context, and site-specific awareness of any strategic environmental sensitivities. The proposed material alteration will be subject to the existing environmental protection measures of the County Development Plan 2022 –2028 and the mitigation measures already provided for through the SEA and AA process of Proposed Variation No 2. It is noted that concerns are raised in the submission in relation to cumulative and in combination effects. Section 7.5 of the NIR and Section 7.3 of the SEA ER identify and comment on the potential for significant cumulative effects arising from plans in particular, given this is a county scale land use plan. Plans and programmes considered as part of this assessment includes the hierarchy of land use and related plans relevant to
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SFRA The OPW's submission is made specifically concerning strategic flood risk assessment. The OPW notes that a footnote referencing "OPW Climate Change Sectoral Adaptation Plan, Flood Risk Management, 2019" still needs to be updated to reference the Flood Risk Management Climate Change Sectoral Adaptation Plan for the period 2025-2030. <i>Adamstown West</i> The OPW's submission states that their previous observation which stated "Further clarity/confirmation might be provided to support the assertion that the watercourse at this location is a surface water drainage feature, rather than a watercourse as indicated in EPA data" has not been addressed in the material alterations. <i>Citywest</i> The OPW notes the response included in the SFRA at material alterations stage outlining culvert blockages at times of intense rainfall in response to their initial submission's observation of an un-modelled watercourse to the south of the zoned area, which has a number of historic flood events associated with it. The OPW indicates that SDCC should liaise with the design team for the River Camac Flood Alleviation Scheme regarding the flood risk in the area.	the Proposed Variation, as set out on pages 70-73 of the Environmental Report. The plans and programmes identified in the hierarchy have been subject to full SEA and AA and where relevant project level assessment via the EIA and AA Directives. In relation to issues raised regarding education, health and transport, existing policies from the South Dublin CDP 2022 -2028 will also apply as well as consultation with Department of Education and Skills, Department of Health and the National Transport Authority as relevant. Relevant transport projects within the NTAs GDA Strategy have been or will be subject to full EIA and AA and relate predominantly to existing built land and artificial surfaces. The need to meet 2040 climate targets and the decarbonising of the transport system in and around the plan area in addition to the consenting process for these projects, does not result in adverse cumulative impacts at strategic scale. At county scale environmental assessment, it is not proportionate or realistic to undertake detailed capacity studies in relation to water and wastewater. This information is reviewed by Uisce Éireann and therefore the assessments must rely on this information provided at county scale. Furthermore, UÉ raised no concerns with regards to MA5.1. MA5.1 provides a set of objectives allowing for assessments through a plan led masterplan process that will inform more refined site-specific proposal on the lands. At strategic scale, these are considered to be broadly consistent with Strategic Environmental Objectives with project level assessments and
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	the application of existing South Dublin County Development Plan protection measures. MA5.1 provides for additional environmental protection measures including surface water and ecological considerations. The mitigation measures in the Citywest lands reflect the environmental profile of the lands, as noted in the SEA Environmental Report and NIR. The site-specific investigations would be appropriately scoped and carried out by suitably qualified specialists. The approach through the SEA and AA in the proposed Variation has been to describe an additional layer of environmental information on the proposed lands which in turn has aimed to provide context, and site-specific awareness of environmental sensitivities and in response, developed site level mitigation to inform lower tier projects should they arise. The Planning Authority has undertaken the required AA process in accordance with the Habitats Directive and relevant guidance. The AA process has informed the preparation of the Variation, and all necessary avoidance, mitigation and safeguard measures are integrated into the Variation. Making a comparison with other development is not applicable, given each of the lands are located in different geographical locations throughout the county. Each of the lands are reviewed on their own individual merits and, as such incorporate different needs and requirements. Comparing Citywest with other lands in the proposed Variation No.2 is not a justified equivalent or parallel. The Chief Executive is satisfied that all proposed material alterations to the proposed Variation No.2 were evaluated in
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	line with the relevant SEA and AA legislation. The material alterations of the Variation comply with the requirements of the associated Directives. It is considered that the SEA and AA have satisfactorily addressed the cumulative impacts and in combination significant effects was undertaken under the SEA and AA as documented throughout the assessment process. The current County Development Plan also includes numerous policies and safeguards in relation to education, health, transport matters and key social infrastructure. OPR The Planning Authority notes the OPR's observation. Section 2.2 of the CE Report sets out the Chief Executive's response and recommendation on MA65.1 and MA66.1. SFRA Office of Public Works The submission from the OPW is noted. The reference in the footnote to the 2019 Climate Change Sectoral Adaptation Plan will be updated to reflect the more recent 2025 Sectoral Plan, noting that this does not have any further impact on the SFRA. <i>Adamstown West – Amendment No.2</i> The original submission by the OPW sought further confirmation that the watercourse at this location is a surface water drainage feature. This was responded to in the CE Report dated May 2026. where it was indicated that the SFRA will be updated to state:
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	<i>The SFRA confirms Site 158 [Adamstown SDZ West] is not within Flood Zone A or B, nor HEFS extents. The SFRA notes a watercourse mapped under the Eastern CFRAM flows along the eastern boundary, and that remnant field drains are surface water features manageable within the SuDS network.</i> Following additional clarification from JBA consultants, the following was clarified with respect of the site: <i>Having reviewed the OSI historic maps (6" & 25") of Site 158, there is no indication of a stream in this area. The geometry of the watercourse does not also match a natural river system and has 90-degree bends. Further review of the LIDAR confirms that there is no catchment to the west of the site that would provide river flows to this system. In its current form it acts as a surface water drain that serves Site 158 only.</i> A drainage channel mapped within the EPA river network crosses the site. After further review of historic mapping and LiDAR data indicates that it functions as a local surface water drain serving the site and adjacent lands, rather than a natural watercourse. Given its limited catchment, the associated flood risk is considered low and can be assessed and managed through a site-specific Flood Risk Assessment, noting that the Eastern CFRAM outputs should be drawn upon to inform, not substitute for, a site-specific Stage 3 FRA. <i>Citywest</i> The Planning Authority liaised with the design team of the Camac Flood Alleviation Scheme (FAS) as advised by the OPW. The design team indicated that based on their latest predicted flooding extents there are no predicted fluvial flooding issues
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	on the site and that any surface water (pluvial) issues can be addressed through surface water management within the required masterplan and through the planning application process. It is noted that the modelling work is still ongoing for the Camac scheme and that further liaison with the OPW and the Camac FAS design team will be undertaken as part of the required site-specific flood risk assessment within point e. of CS8 SLO2.
CE Recommendation SEA/AA No change except for that set out in Section 2.2 in response to the OPR's observation. SFRA To update the SFRA by way of footnote reference to the Flood Risk Management Climate Change Sectoral Adaptation Plan for the period 2025-2030 <i>Adamstown SDZ West</i> To update the text within the final SFRA as follows: <i>Having reviewed the OSI historic maps (6" & 25") of Site 158, there is no indication of a stream in this area. The geometry of the watercourse does not also match a natural river system and has 90 degree bends. Further review of the LIDAR confirms that there is no catchment to the west of the site that would provide river flows to this system. In its current form it acts as a surface water drain that serves Site 158 only.</i> <i>Citywest</i> No change	

3.4 Out of Scope

A number of submissions, while referencing a particular material alteration (MA) refer to matters that do not directly relate to the Proposed Material Alteration to the Proposed Variation No.2 of the County Development Plan. In many cases submissions also raised issues directly relevant to the material alterations and where this is the case they have been summarised and responded to in the relevant MA.

For the purposes of clarity issues raised which were out of scope are outlined and briefly summarised below:

Submission No.		
SD-C431-56 Saggart Community Council	SD-C431-59 Kieran Mullen	SD-C431-66 Lisa A Lowry
SD-C431-70 Amanda Higgins	SD-C431-72 Harish Kumar Muttath Krishnan	SD-C431-74 Gwen Maguire Maguire
SD-C431-85 Siobhan Hennessy	SD-C431-103 GARETH HICKEY	SD-C431-103 GARETH HICKEY
SD-C431-115 Anne Kavanagh	SD-C431-141 Patrick Healy	SD-C431-237 Emma Murphy
SD-C431-238 Sandra M	SD-C431-253 Seán Ó Rudaí	SD-C431-259 Seán Ó Rudaí
SD-C431-278 Magdalena Zajac	SD-C431-333 Fiona Smyth	SD-C431-362 Michael Malley
SD-C431-401 Cairn Homes Plc.	SD-C431-428 Tom Moriarty	SD-C431-444 Josip Pavlic
SD-C431-467 Evara Developments Ltd	SD-C431-469 SLR Consulting Ireland	SD-C431-501 LIONA O'TOOLE
SD-C431-566 Saggart Village Residents' Association		
Summary		CE Response
MA 2.1 Adamstown SDZ West		
Submissions raise concerns regarding:		Section 58 of the Planning and Development Act 2024 sets out the legislation in relation to the variation process to a Development Plan.
<u>Density, Visual Amenity and Settlement Character</u>		
Submissions sought lower density development, reduced building heights, enhanced landscaping and strong visual		Part 13(f)(ii) states the following:

buffers to ensure an appropriate transition between Adamstown and the surrounding rural landscape. <u>Loss of Open Land and Green Buffers and Historic Landscape</u> Submissions raised concerns regarding the loss of open countryside and the lack of defined green buffers, calling for stronger measures to protect landscape character, prevent settlement coalescence and retain open space. Concerns were raised in relation to historic nature of the lands and overall landscape character of the lands. MA5.1 Citywest Submissions raised observations relating to zoning, overdevelopment, education, health provision, childcare, utilities/services, transport and crime and heritage. A submission also states that the current Masterplan wording for the SLO fails to consider the following: • Social Infrastructure Audit • Education Capacity Assessment • Healthcare Assessment • Childcare Assessment • Sports and Recreation Assessment • Water and Wastewater Infrastructure Assessment • Uisce Éireann consultation • Phasing and Delivery Programme • Implementation Mechanisms	<i>that written submissions with respect to the modification that constitutes a material alteration of the proposed variation or an assessment referred to in paragraph (b) or (c) and made to the planning authority within the period specified in the notice shall be taken into account by the authority before the variation of the development plan is made.</i> Part 15(c) (iv) <i>submissions made by any other person in relation to the modification to the proposed variation and any strategic environmental assessment or appropriate assessment of the modification (and the report may, for this purpose, group and summarise the issues raised in different submissions on a thematic basis),</i> On this basis, only submissions or observations made in respect of the proposed material alterations and accompanying SEA or AA are taken into consideration within this Chief Executive's report. The purpose of this stage of the consultation process is to enable the public and interested parties to give their observations on the proposed Material Alterations. It is noted that in many cases the issues raised were previously considered at the draft Variation stage of the process and where this was the case they informed the proposed Variation and the material alterations.
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- Monitoring Arrangements

A submission refers to SLO requirements set out in other lands associated with the proposed Variation No.2 and argues that similar provisions should be incorporated on the Citywest lands.

A submission outlines that the projects set out in the SDCC 3 Year Capital Programme 2025-2027 for the area do not demonstrate that the infrastructure needs have already been met. The Capital Programme also does not present an equivalent integrated package of named investment for Saggart, Rathcoole, Newcastle and Brittas as a connected group of settlements. While individual projects are identified, these villages will share many of the cumulative impacts of Citywest growth and should not be treated as peripheral to the rezoning decision.

MA16.1 Liffey Valley MRC

A submission raised no objections to apartment development at this location. Age friendly apartments must be considered for development of these lands along with social and affordable housing.

Lucan is expected to accommodate approximately 35% of the additional housing growth proposed through Variation No. 2 representing one of the largest concentrations of future residential growth within the county. Lucan has no DART service, no Luas connection, one primary care centre, no public hospital and a road network already operating under significant congestion and capacity

constraints. Lucan has been identified to accommodate a disproportionately large share of that growth. Therefore, the Development Plan requires stronger safeguards to timely deliver strategic transport, healthcare and community infrastructure before or alongside future development.

Collectively, the amendments relating to Adamstown SDZ West, the Adamstown South & West (Outer) Strategic Development Area, Finnstown Castle, St. Edmundsbury and Liffey Valley strengthen the Development Plan by ensuring that future growth is better aligned with infrastructure delivery, environmental protection and long-term community wellbeing. The amendments adopted by the elected members recognise that sustainable communities require more than housing alone.

MA17.1 and MA17.2

A submission was made by KPMG Planning on behalf of Cairn Homes Plc. Concerns are raised with the wording of the bulk purchase SLO which could undermine legitimate housing delivery models, specifically create uncertainty for apartment development, and fail to make appropriate provision for the role of the Council, The Land Development Agency (LDA), Approved Housing Bodies (AHBs) and other State-supported housing delivery mechanisms. The wording would constrain apartment delivery, state-supported acquisition mechanisms, LDA activity, affordable housing, cost-rental delivery or other legitimate mixed-tenure housing models. It is not considered necessary to stitch restrictions on bulk

purchase into the development plan. National housing policy is clear that local authorities should be empowered to restrict the bulk purchase of houses and duplexes. The current wording risks inadvertently restricting the bulk purchase of units for social and affordable housing.

MA22.1

A submission refers to MA22.1 however the comments relate to wider strategic issues linked to healthcare capacity, visual amenity, loss of strategic open land and the absence of a clear phasing strategy linked to infrastructure delivery with the risk of development proceeding ahead of infrastructure.

MA42.1

A submission was made by SLR Consulting Ireland acting as environmental advisors to Roadstone Ltd. The submission wants to re-iterate the importance of protecting strategic assets. Belgard Quarry is a long-established and economically important limestone quarry asset providing a continuous supply of natural aggregate supporting the construction industry at a national scale. This continued long term secure supply of aggregates is essential to supporting ongoing and unprecedented demand for infrastructure and residential development across the country. The location of Belgard Castle RPS 206 (DU021-026) a protected structure within the quarry lands is referenced.

It is considered that while Belgard Quarry continues in operation, the future rezoning of lands in this vicinity for

residential use is extremely premature and it is considered that while the quarry is in operation, there is a direct conflict with residential use on the identified lands.

The South Dublin County Development Plan 2022-2028 (SDCC) recognises the aggregate industry as “an important economic sector that provides the raw materials for the construction industry”. There is concern that the future rezoning of these SDA lands to residential would conflict with this existing land use and may not be feasible in the short to medium term. Any rezoning of lands for residential development in proximity to an operating quarry would be contrary to the Council’s objective of ensuring the protection of access to proven aggregate resources into the future.

Reference is made to the OPR Case Study Paper CSP07, titled "Quarries and the Local Authority Development Plan," published in May 2025 and other documents relating to aggregates. It is respectfully requested that South Dublin County Council review and consider this case study as part of the future studies to inform the rezoning of ‘Future Strategic Long-Term Development Areas (Future SDAs)’ and in particular in consideration of MA 42.1 which will impact on the operation of Belgard Quarry and its ability to provide a fixed, finite resource for the local economy.

3.5 Procedural Matters

Submission No. SD-C431-257 Seán Ó Rudai SD-C431-498 O’Flynn Group	
Summary	CE Response
OPR Powers A submission suggests that the Office of the Planning Regulator's recommendation to 'continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation' is over-prescriptive in a similar manner to Mount Salus Residents Owners Management Company Limited By Guarantee v. An Bord Pleanála [2026] IECA 28 and by recommending all the sites for rezoning is not allowing the council the flexibility granted by the NPF Implementation Guidelines of 'up to 50% additional provision'. Material Alterations - Zoning A submission from O’Flynn Group queries whether the statutory process permits the inclusion of entirely new rezoning proposals that were not part of the original variation placed on public display. The submission argues that Section 58 of the Planning and Development Act 2024 consistently refers to a “material alteration of the proposed variation”, meaning that any material alteration must remain directly linked	OPR Powers As set out in the OPRs submission, Recommendations are made by the OPR where clear inconsistencies with legislative provisions or policy frameworks are identified and are intended to be addressed to ensure compliance. The OPR has made recommendations to the proposed Variation at both draft and material alteration stage. The reference to the Mount Salus case is noted. In Mount Salus Residents Owners Management Company Limited By Guarantee v. An Bord Pleanála [2026] the Court found that the OPR and the Minister erred in law in giving a direction to the planning authority concerned relating to how development plan policy was interpreted having regard to national policy. At this Material Alteration stage, the Office has made two recommendations. The rationale for the recommendations is set out in the submission from the OPR to the Material Alterations, following on from their submission at the draft Variation stage. A summary of the submission and hyperlink to same is set out in section 2 of this CE Report. Once the Variation is adopted, it will be a matter for the OPR to assess it and form an opinion on its consistency with the National

to, and modify, the variation originally published and subject to public consultation. It is suggested that material alteration process cannot be used to introduce new residential rezonings on lands that were not previously included in the Proposed Variation or assessed by the Chief Executive. Instead, such rezonings should be progressed through a separate variation process in their own right. The submission requests that the Chief Executive explicitly address in the Section 58 report whether the inclusion of additional sites at material alteration stage is lawful and within the scope of the statutory process. This issue is considered particularly significant where newly introduced sites are being relied upon to compensate for the removal of residential lands that had previously been assessed and recommended by the Planning Authority. If the introduction of new residential lands is deemed permissible, the Chief Executive should assess whether the revised residential land strategy still achieves the objectives of Variation No. 2. It contends that the proposed inclusion of Cornerpark and Elmcastle Court does not simply replace housing capacity lost elsewhere, as these sites have different planning characteristics, environmental constraints and implementation considerations. The submission argues that the Chief Executive should clearly examine both the procedural legitimacy of introducing new sites through material	Planning Framework and relevant policy, as set out under section 63(10) of the Planning and Development Act 2024. At this stage of the process the OPR has not made any recommendations to the Minister. Material Alterations - Zoning A submission made by / on behalf of the developer for MA6.1 St. Edmundsbury within which the issue of the appropriateness of new zoning at material alteration stage was raised. Issues raised in the submission have generally been responded to in the CE Response to MA6.1 and in MA65.1. In relation to material alterations, the Planning Authority is satisfied that the process outlined in Section 58 of the Planning and Development Act 2024 has been followed. In this regard, the inclusion of the lands at Elmcastle Court, Kilnamanagh and Cornerpark, Newcastle were subject to public consultation under Section 58 (13) (f). All submissions on these MAs were then reviewed, summarised and responded to and will be considered by the elected members, as required by the Act, at the Special Council Meeting on 19th October 2026. The lands are not considered as a replacement or alternative to the original lands proposed as part of the variation. The NPF Implementation Guidelines requested that planning authorities consider up to 50% additional provision. In this regard, the proposed Variation identified approximately 45% additional provision. The inclusion of Elmcastle and Cornerpark (Haughan's Field) supplements the lands proposed in the draft Variation while remaining within the 50% additional provision. It is considered that the lands introduced at material alteration stage,
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alterations and the planning implications of relying on these sites to replace previously identified residential lands. The submissions also highlights the OPR and its statutory power for recommendations. In light of the above, it requests that the Chief Executive's report expressly consider the statutory and legal implications of the Proposed Material Alterations before making recommendations to the elected members.	while considered by the Chief Executive as not being preferred sites, are directly linked to the Variation and its purpose to identify land to meet the baseline target with additional provision. It is noted that the OPRs submission to the Material Alterations includes Recommendation 1, summarised and responded to in section 2 of this CE Report and referred to in the response to MA6.1 and other material alterations. It is also noted that the OPR in their submission did not raise an objection or observation in relation to the lands at Cornerpark or Elmcastle.
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Section 4 – List of Submissions

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[SD-C431-1071 Bogumila Beszcanska](#)
[SD-C431-1072 Caoimhe Farrell](#)
[SD-C431-1073 Catherine Rafferty](#)
[SD-C431-1074 Charles Molloy](#)
[SD-C431-1075 Austin Mc Carthy](#)
[SD-C431-1076 illegible](#)
[SD-C431-1077 Colm Connolly](#)
[SD-C431-1078 D H](#)
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[SD-C431-1080 Danny Tyrrell](#)
[SD-C431-1081 David Harding](#)
[SD-C431-1082 Deirdre ni Mhurchu](#)
[SD-C431-1083 Donncha Mc manus](#)
[SD-C431-1084 Eileen Shoer](#)
[SD-C431-1085 Elizabeth Moffatt](#)
[SD-C431-1086 Ethan Toomey](#)
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[SD-C431-1091 Gillian Doyle](#)
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[SD-C431-1093 Helen Hickey John Hickey](#)
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[SD-C431-1637 Nathan Dooley](#)
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[SD-C431-1639 Emur Sonat Erdem](#)
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[SD-C431-1641 Michael prendergast](#)
[SD-C431-1642 Finbar O'Gorman](#)
[SD-C431-1643 Michael Lancaster](#)
[SD-C431-1644 Fiona Lennon](#)
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[SD-C431-1646 Maura Egan](#)
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[SD-C431-1649 Mattie Mc Cabe](#)
[SD-C431-1650 Mary Rudden](#)
[SD-C431-1651 Mary Kennedy](#)
[SD-C431-1652 Mary Nolan](#)
[SD-C431-1653 Mary hackett](#)
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[SD-C431-1655 Gary Kiernan](#)
[SD-C431-1656 Mary Duffy](#)
[SD-C431-1657 Mary Curley Peter Curley](#)
[SD-C431-1658 Martina Dunne](#)
[SD-C431-1659 Mario Zhlo](#)
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[SD-C431-1662 Marie Tyrrell](#)
[SD-C431-1663 Marie O Sullivan](#)

[SD-C431-1664 Marie Murray](#)

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[SD-C431-526 Christina Browne](#)
[SD-C431-527 Sophia Byrne](#)
[SD-C431-528 Amit Sharma](#)
[SD-C431-529 Alison Kenny](#)
[SD-C431-530 Ranjana Sharma](#)
[SD-C431-531 Maria Murphy](#)
[SD-C431-532 Hugh Carty](#)
[SD-C431-533 Dan Barjovanu](#)
[SD-C431-534 Cyclist](#)
[SD-C431-535 Anne-Marie Flynn](#)
[SD-C431-536 Devinder Sharma](#)
[SD-C431-537 Amy Kelly](#)
[SD-C431-538 Martin Kelly](#)
[SD-C431-539 Renee Flynn](#)
[SD-C431-540 Yuvraj Shah](#)
[SD-C431-541 Sheetal Shah](#)
[SD-C431-542 Joanna Kuruc](#)
[SD-C431-543 Maria Guerriero](#)
[SD-C431-544 Ciaran Byrne](#)
[SD-C431-545 Kathryn Murray](#)
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[SD-C431-548 Fidelma Duffy](#)
[SD-C431-549 James Delaney](#)
[SD-C431-550 Lisa Moloney](#)
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[SD-C431-552 Lisa Donnelly](#)
[SD-C431-553 Brian McKenna](#)
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[SD-C431-1098 Janice O'Brien](#)
[SD-C431-1099 Joan Mc Cartney](#)
[SD-C431-1100 John Corkery](#)
[SD-C431-1101 John Walsh](#)
[SD-C431-1102 Joseph S](#)
[SD-C431-1103 Martin Boland](#)
[SD-C431-1104 Martin Mees](#)
[SD-C431-1105 Martin Mouler](#)
[SD-C431-1106 Mary Clancy](#)
[SD-C431-1107 Mary Downes](#)
[SD-C431-1108 Mary J Nolan](#)
[SD-C431-1109 Mary Manley](#)
[SD-C431-1110 Mary O'Reilly- Moore](#)
[SD-C431-1111 Matthew Doherty](#)
[SD-C431-1112 Maura Butler](#)
[SD-C431-1113 Kathleen Denny](#)
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[SD-C431-1115 Leonard Toomey](#)
[SD-C431-1116 Liam Byrne](#)
[SD-C431-1117 Louise Dwoling](#)
[SD-C431-1118 M L](#)
[SD-C431-1119 Margaret Butler](#)
[SD-C431-1120 Margaret Dowling](#)
[SD-C431-1121 Margaret Doyle](#)
[SD-C431-1122 Maureen Brady](#)
[SD-C431-1123 Margaret Mc Cabe](#)
[SD-C431-1124 Marjorie Elliott](#)

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[SD-C431-1666 Gerry Geheran](#)
[SD-C431-1667 maria hamill](#)
[SD-C431-1668 Marcia Mc Donagh](#)
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[SD-C431-1670 Lucia gavin](#)
[SD-C431-1671 Lorraine Norry](#)
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[SD-C431-1679 lenie Dabatos](#)
[SD-C431-1680 Lauryn Ince](#)
[SD-C431-1681 L Traynor](#)
[SD-C431-1682 Hannah Condon](#)
[SD-C431-1683 Kevin Downes](#)
[SD-C431-1684 Kevin Donoghue](#)
[SD-C431-1685 Keith Flanagan](#)
[SD-C431-1686 Kate Sawyer](#)
[SD-C431-1687 Kathryn Keenan](#)
[SD-C431-1688 Helena O'Brien](#)
[SD-C431-1689 Kathleen Diggins](#)
[SD-C431-1690 Karl Feeney](#)
[SD-C431-1691 Karen Quinn](#)
[SD-C431-1692 Hugh Mulrooney](#)
[SD-C431-1693 Julie Monahan](#)
[SD-C431-1694 Josie Carey](#)

[SD-C431-555 Malik Irfan](#)
[SD-C431-556 Ballydowd Residents' Association](#)
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[SD-C431-558 Ben Healy](#)
[SD-C431-559 Lizzie Munnelly](#)
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[SD-C431-561 Ben Healy](#)
[SD-C431-562 Luke Heffernan](#)
[SD-C431-563 Caroline Carney](#)
[SD-C431-564 Derek Porter](#)
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[SD-C431-568 Finnstown Abbey Residents Association](#)
[SD-C431-569 Sinéad Farrell](#)
[SD-C431-570 Senan Farrell](#)

[SD-C431-1125 Marian Tynan](#)
[SD-C431-1126 Maxim N/A](#)

[SD-C431-1127 Marianne O Connell](#)

[SD-C431-1128 Mark Harding](#)
[SD-C431-1129 Mark Whelan](#)
[SD-C431-1130 Maura Lynagh](#)

[SD-C431-1131 Maya Campbell](#)
[SD-C431-1132 May Mullarkey](#)
[SD-C431-1133 Matthew Kernan](#)
[SD-C431-1134 Illegible illegible](#)
[SD-C431-1135 Olive Stridford](#)
[SD-C431-1136 Michael Boland](#)

[SD-C431-1137 Pamela French](#)
[SD-C431-1138 Pat Mc grath](#)

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[SD-C431-1700 John Harrington](#)

[SD-C431-1701 illegible](#)
[SD-C431-1702 John Dooley](#)
[SD-C431-1703 John bekema](#)
[SD-C431-1704 Jacqueline O' Brien](#)
[SD-C431-1705 Joanne Carolan](#)
[SD-C431-1706 James Monahan](#)

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[SD-C431-1708 David Marshall](#)

[SD-C431-1709 Imelda O Hara](#)
[SD-C431-1710 Patricia Haran](#)