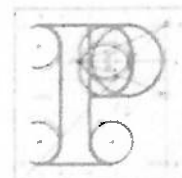


**Our Case Number:** ABP-322638-25



An  
Coimisiún  
Pleanála

Liona O'Toole  
10 Brookfield  
Finnstown Abbey  
Lucan

**Date:** 15 July 2025

**Re:** Proposed residential development at the Kishoge Development area of Clonburris SDZ  
In the townlands of Kishoge, Esker South, Grange and Balgaddy, Clonburris, County Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin  
Executive Officer  
Direct Line: 01-8737244

JA02

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**Independent Councillor for Lucan  
Peace Commissioner**

**Submission to An Bord Pleanála / An Coimisiún Pleanála**  
**Re: Kishoge/Clonburris SDZ Applications – Sites 3, 4 & 5 (Ref. JA06S.322638)**  
**From: Councillor Liona O'Toole**  
**Date: 13 July 2025**  
**Email: [lotoole@cllrs.sdublincoco.ie](mailto:lotoole@cllrs.sdublincoco.ie)**

## **1. Introduction: Support for Community and Strategic Vision**

I welcome the ambition set out in the Clonburris SDZ to develop a “vibrant community offering a new way of living” as stated in Section 1.2 of the Planning Scheme. However the success of this vision depends on balancing new development with the needs and protections of long-established communities in Lucan.

As a local councillor and resident of Lucan for over 30 years I have engaged directly with residents throughout this process including through public meetings and submissions. I fully support the submissions made by residents and endorse the issues concerns and proposed solutions they have highlighted. Their contributions reflect deep-rooted knowledge and a lived understanding of what these developments mean in practice.

## **2. Support for Resident Submissions**

Having attended resident meetings and reviewed the many detailed public submissions I want to explicitly support the arguments raised by the Lucan community including:

- The need for public consultation before introducing permeability links to established estates.
- Concerns about biodiversity loss removal of green space and noise barrier removal especially near Thomas Omer Way.
- Opposition to permeability links that alter the character and safety of estates like Foxborough, Tullyhall, Rossberry and Oldbridge without adequate community input.
- The pressure on existing transport, childcare, health and youth services which must be addressed *before* new residents move in.
- The need for dedicated play spaces and youth facilities rather than relying on centralised amenities that are not realistically walkable for all.

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These are not new or opportunistic objections. Many of these residents played a significant role in the planning of Clonburris especially during the period from 2015 to 2018 when the current SDZ plan was being developed and finalised. They participated in public consultations made formal submissions and worked constructively with the local authority to shape a sustainable community-focused plan. Now as individual applications are coming forward they are rightly calling for the intent of that planning process to be respected in practice.

### **3. Reinstate Part 8 Public Consultation on Permeability**

In 2018 South Dublin County Council adopted a policy requiring Part 8 public consultation before implementing permeability into existing estates. While An Bord Pleanála removed this condition from the final SDZ scheme it is still widely supported by councillors, residents and community management groups.

#### **Requested Condition:**

“No pedestrian, cycling or vehicular link to existing residential estates (including Foxborough, Oldbridge, Tullyhall, Rosberry etc.) shall be implemented without prior Part 8 public consultation and Council approval.”

This is necessary to maintain democratic oversight and community confidence.

Furthermore the Adamstown SDZ and Esker Embankment permeability proposals are currently going through a public consultation process providing a transparent and collaborative model for how such sensitive proposals should be handled. Many of the residents now raising concerns in Clonburris were also directly involved in shaping the SDZ masterplans and they rightly expect the same consultative standards to apply. Their concerns are grounded in:

- Safety risks associated with unmanaged permeability links;
- Loss of long-valued green space;
- Increased vulnerability to antisocial behaviour without local buy-in;
- Noise and amenity disruption due to the removal of sound buffers.

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Peace Commission**

I urge ABP to apply the same consultative principles now being followed in Adamstown to ensure permeability is context-sensitive and democratically endorsed.

#### **4. Step-Down & Independent Living: A Vital Missing Piece**

Lucan's housing stock was predominantly built in the 1990s with a high volume of 3-bedroom family homes and limited provision of smaller homes. As a result there is now a chronic shortage of step-down or independent living options (such as 1-2 bedroom accessible homes for older residents or downsizers) in the wider Lucan area.

Although Clonburriss SDZ references independent and semi-independent living there is currently no clear commitment to delivery scale location or timing. In Adamstown such units are only now being introduced despite the fact that we are already halfway through that SDZ's phasing.

This is a critical opportunity to address the imbalance:

- Allowing older generations to remain in their community in downsized homes
- Freeing up larger homes for younger families
- Maintaining social and intergenerational cohesion within Lucan
- Ensuring that the SDZ reflects real housing lifecycle needs.

Given that SDCC owns very limited development land in Lucan if this isn't planned within the SDZs now it may not happen at all.

#### **Requested Action:**

A substantial allocation of step-down, independent or age-friendly homes (e.g. accessible apartments, courtyard dwellings or one-bed bungalows) must be included in Sites 3, 4, and 5 delivered in early phases not delayed to later stages.

# CLLR. LIONA O'TOOLE



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## 5. Childcare Provision: Act Now Not Later

Lucan and Adamstown are facing a childcare crisis. As highlighted in the South Dublin County Childcare Committee (SDCCC) December 2024 Supply & Demand Report Lucan has:

- 1,300+ children on waiting lists across 54 services.
- A 66% decline in full day care services since 2016 despite population growth.
- Sessional services reduced by 50%.
- No creches yet built in many planned developments despite being approved.

Families are already struggling to access early learning care (ELC) especially for toddlers aged 1–3 the most in-demand group. This cannot continue.

### **Requested Action:**

Creche and childcare facilities must be delivered in advance of or simultaneously with new housing in Sites 3, 4, and 5.

## 6. Transport Infrastructure & Permeability: A Unique Challenge for Lucan

Lucan is unique in the Irish planning landscape. It is the only community bordered by two major Strategic Development Zones (SDZs) Adamstown and Clonburris adjacent to one another and covering nearly 500 hectares combined. These SDZs were designed as self-sustaining new towns each with its own integrated public transport and active travel infrastructure and not intended to overload or rely upon Lucan's existing road and bus networks.

The original transport vision included:

- Dedicated rail services (Adamstown and Kishoge stations),
- New and expanded bus corridors,
- Internal pedestrian and cycle networks,
- And major connecting roads like the R136 Outer Ring Road, the R120 Newcastle Road and the planned 120m Clonburris Street Link across the Grand Canal.

This infrastructure is more than adequate to support internal and external connections to and from Clonburris without introducing permeability routes through long-established low-capacity residential areas.

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## **7. Permeability: Understood in Principle, But Misapplied in Practice**

It is understood and widely accepted by both observers and residents that these new towns were never intended to be completely separate from the existing Lucan community. Connections between the old and new areas are essential and expected. However, the case being made here is that not all permeability links and potentially none are needed through long-established estates given the extensive network of existing and planned connections.

These include:

- Major connecting roads like the R136 Outer Ring Road and the R120 Newcastle Road,
- The planned 120m Clonburriss Street Link bridge over the canal,
- And new active travel infrastructure including the Griffeen Valley Park extension.

The Clonburriss SDZ has been comprehensively designed to provide integration without requiring intrusive links through quiet mature neighbourhoods. Permeability in this context would do more harm than good rerouting traffic and movement through estates that were never intended to serve such a purpose.

## **8. Community Fatigue and Consultation Deficit**

Lucan residents are not objecting to development but to the erosion of agreed consultation principles. Many have engaged with the planning of Clonburriss throughout its formal SDZ process particularly between 2015 and 2018 when the current scheme was shaped and adopted. The original LAP process (dating to 2006) was replaced by the statutory SDZ framework after 2014.

Residents made significant contributions during that time and they now rightly call for:

- Respect for the SDZ planning commitments,
- Proper consultation on permeability routes
- And fair treatment after 20 years of navigating multiple overlapping planning processes for Adamstown and Clonburriss.

This is not just about permeability or roads it is about trust in the process.

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## **9. Conclusion and Final Requests**

I welcome sustainable development but it must be delivered with respect for long-established communities. The residents of Lucan have contributed constructively and their voices must be central in the decision-making process.

**We respectfully request that An Bord Pleanála:**

- Reinststate Part 8 public consultation for any permeability into existing estates.
- Condition the early delivery of childcare services before or alongside housing completions.
- Require provision of step-down / independent living housing in early phases of Clonburris.
- Reject permeability links that serve no transport necessity.
- Acknowledge the unique dual-SDZ burden on Lucan and the fatigue experienced by residents engaged in two decades of strategic planning.
- Ensure that development in Clonburris honours the democratic commitments and practical frameworks adopted in the 2018 SDZ plan.

Let us ensure that Clonburris is built with the community—not at its expense.

Yours sincerely,

Liona O'Toole

Independent Cllr for Lucan