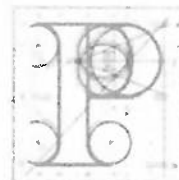


Our Case Number: ABP-322638-25



An
Coimisiún
Pleanála

Paul Gogarty TD & Cllr. Helen Farrell
39 Esker Lawn
Lucan
K78 K6R9

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

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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Paul Gogarty TD and Cllr Helen Farrell, c/o 39 Esker Lawns, Lucan, Co Dublin K78 K6R9

**An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902**

14th July 2025

Case reference: JA06S.322638

**Proposed residential development at the Kishoge Development area of Clonburris SDZ –
Sites 3, 4 and 5 in the townlands of Kishoge, Esker South, Grange and Balgaddy, Clonburris,
County Dublin**

To whom it concerns,

Given the scope of this development and the fact that it constitutes a large segment of the Clonburris SDZ, we respectfully request an Oral Hearing to go through the scheme in the detail it deserves and allow residents and elected representatives to cross-examine relevant officials based on 2025 information.

As An Coimisiún Pleanála will be aware, the overall plan was appealed in 2018/19 period, citing major deficits in facilities and infrastructure. As a considerable amount of time has since passed, any examination of the Kishoge elements of this development need to be examined in the context of what has and has not happened in the intervening period.

There is updated information on bus networks, which remain wholly insufficient to serve such a high-density diverse population with complex transport requirements. The train station has finally opened, albeit at a refurbishment cost of €4 million and provided with no proper car park; except on-street, necessitating the removal of a lane, which has already led to major congestion to the complete frustration of the population in the area. Schools have been or are in the process of relocating, but are largely servicing the population outside the SDZ, not within it. There is an even greater deficit of playing pitches, community buildings and other amenities and

with no phasing in the master plan, there is no guarantee these will ever be provided in a reasonable timeframe. We are already seeing a slowing of delivery of phased community resources in Adamstown SDZ, so without these safeguards in place in Kishoge, the new community is likely to be considerably under-resourced.

Childcare places are at a premium, with the Adamstown SDZ development not keeping up with demand and with parents contacting Local Councillors and TD's to express concern about their inability to get a place for their babies and children locally. The current provision at these sites and in the Masterplan is at the very low end of what is necessary. Parking provision, as has been seen in Adamstown SDZ and Kilcarbery is insufficient and a linear public transport system does not allow multiple workers renting the one property whose jobs, education, access to childcare and facilities depend on mobility to be able to park vehicles, and as a result people are parking on pavements and in bus lanes. These are all issues that need to be urgently addressed.

Retail provision has so far been minimal as per the building that has taken place off the Fonthill Road. Progress on the South Link Street has been good, but there is no sense of any major amenities being provided for the houses that have been or are going to be built in the next five years.

Given that these elements of the plan are so large as having required the local authority to go before the planning authority, we believe that this is an opportunity for a fundamental review of the plan for the area in question.

An Oral Hearing would be the best medium through which to do this, but in the meantime we also wish to make a number of headline observations.

A recommendation to the Government that the Clonburris SDZ plan be reviewed

Adamstown saw a review of the 2003 plan in 2013. The Clonburris plan of 2007 was reconstituted in 2015 and as it was passed in 2019, we believe that a further review should be scheduled. We would like the Commission to make this recommendation to the Taoiseach and members of the cabinet.

Protection of cul de sacs for existing residents

While the Clonburris SDZ and the Kishoge elements focus on permeability throughout the housing developments, this cannot and should not create permeability into existing housing estates such as Foxborough, Tullyhall and Oldbridge, without full consultation by residents and the expression of these wishes by elected representatives via a Part 8 process, or similar.

During the SDZ debates, a number of motions were passed, and while a binding veto by residents was not permitted, there was clear reference to consultation with residents living in existing housing developments. This process is not such a consultation as Councillors do not have a vote on same.

The context of this is simple. Anyone buying or choosing an offer of a house in the Kishoge area will be doing so in full knowledge that permeability is at the heart of the development. Anyone who purchased or moved into a house adjoining the SDZ moved into a cul de sac for a specific reason, the most prominent being a safe and secure area for small children to play under supervision by parents. Other considerations would have been less passing traffic and less opportunities for would-be robbers to escape as easily from the area. In this context, it is unfair and unjust to create pedestrian openings into such estates without the express opportunity of residents to discuss this, in isolation and on its own merits, with the final vote coming from elected Councillors.

It goes without saying that any road opening is equally unwarranted.

A recalculation of school places

While this is a matter for the Department of Education, it goes without saying that the Clonburris school spaces in the Kishoge area, are already saturated by current demand from outside the SDZ. While some of the primary demand may temporarily reduce due to population stabilisation at this end of Lucan (while increasing massively in Adamstown), the growth is going to come from the second level population. Consideration needs to be given for an additional school.

A recalculation of playing pitch requirements

The overall Clonburris SDZ had space for just one full size GAA/Rugby pitch and five soccer pitches. Unless the plan is for a massive influx of foreign workers at the expense of local housing need, there will definitely be a need for additional GAA pitches – and indeed this need is already apparent in the wider Lucan and Clondalkin communities. And on the assumption that a higher cohort of residents may come from Asia (as has been witnessed in the Seven Mills area thus far), it is also the case that at least one and possibly more cricket pitches also need to be catered for.

Update needed on future Garda station and Fire Station locations and timescale

At this stage we need to hear further tangible information from the Dublin Fire Service and the Garda Commissioner regarding when these stations need to be located and will open fully. Land may be reserved but we need certainty as to whether this is still optimal, or else it could be put to better use.

Update on retail and community building provision

Has there been any analysis of the nature of migration into Clonburris so far in terms of who is purchasing the full sale price or affordable housing, or who is moving into specific social housing units? What are their needs? Is depending on the Liffey Valley retail hierarchy sufficient any longer, given the daily congestion on the Fonthill Road?

Assessment of parking requirements at Kishoge train station

When Kishoge was earmarked to open first it had dedicated car parking. As time passed, this availability was removed, necessitating the narrowing of the R136 roadway and ongoing congestion as a result. SDCC maintains that this is a positive, meaning the slowdown of traffic passing through what will be increasingly a residential area. This congestion on a road that previously operated fluidly is a source of great frustration to residents in the area and is seen as an engineered congestion that is wholly avoidable. But that said, it is critical that it remain an orbital route to Tallaght as was originally planned, as one accident on the M50 will lead to diversions. This needs to be looked at more closely during an oral hearing.

Assessment of congestion

Congestion is predicted to elongate at peak hours according to TII and the NTA. What is the current plan for dealing with this in terms of the routes within and adjoining the SDZ? The Northern section is already regularly congested. What plans are in place to deal with this? For example, roundabouts encourage flow but are bad in congestion, while traffic lights are bad in flow but are better to manage congestion. Are there any plans for dual roundabout traffic light configurations within the masterplan and this part of Kishoge?

Again, an oral hearing is essential to tease these issues out

Sources of heating in dwellings

Currently it is planned that heat pumps will be the source of heating, not district heating - reported that this can be decided later, but can this be decided in the current permission?

Need to clarify use of bridge over the Southern Link Road

Reading from the plan, it appears that bridge over the Southern Link Road will now *possibly* be limited to just Active Travel? Does this not mean that a further access point for vehicular traffic is removed from a heavily populated area and will add to localised congestion. Should this not be dual road and active travel?

Bus route planning

Under Material Assets (Transport) Report, there is inadequate provision for new bus routes. Overall, it is essential that bus routes, at the earliest possible point in the project, connect Kishoge to school, employment, retail and leisure centres in the greater vicinity, to ensure quality of life for residents and to avoid reliance (and potential stressors around parking spaces in the SDZ) on cars. While "Local Bus 1" and "Local Bus 2" seem to be good proposals, the rollout of the routes should be done in consultation with residents to ensure routes that serve immediate needs of residents and link up with existing routes that vehicle capacity may need to be increased for. It is also important to review impact on existing bus network and commuter rail services to ensure that capacity is sufficient to serve the future needs of the greater Kishoge and Clonburris areas. Future Lucan Luas routes should aim to include dense development areas such as Clonburris as well as serving existing, older population centres. This is why we need to cross-examine the NTA regarding future plans. At the last Oral Hearing this was not permitted, and we had to go through the third party of Council officials, but ideally we need to query the agencies to see the specifics of what is planned and also see what conditions An Coimisiún Pleanála can put in, if any, pending a wider SDZ review.

Additionally, construction of the limited parking spaces that allow for future install of charging stations is a positive, and perhaps something learned from Adamstown, but more parking spaces overall are vitally needed to avoid major issues with connectivity and functionality for residents.

A recalculation of parking spaces

While it is all well and good that car use should be discouraged, car ownership is still a necessity, even in an SDZ. The W4 bus route and the Kishoge and Clondalkin train stations provide access to Dublin City Centre, but many workers are further afield in areas such as Cherrywood or work different shifts in hospitals and IT centres where it is not possible or safe to use public transport. Moreover, a lot of the people living in Adamstown own vans and visit various locations as part of their work. They need somewhere to park adjacent to where they live. Childcare is not always available in the immediate locality (as we currently see in Adamstown) and even with what is proposed you will see people dropping off children en route to work. It may be a hybrid situation where people work from home, but they still need to use a

car and have somewhere to park it. The current parking provisions need to be increased and if this can be done in this section pending a wider review then the Commission should facilitate.

Proposed parking spaces of less than 1 space per residential unit is completely insufficient - we only have to look at parking issues in Adamstown to see that this will also happen in Clonburris. Modal shift to public transport urgently needed, but using a "car lite" approach of only 883 spaces for the whole mixed-use development is completely at odds with people's needs. The report states that "The availability of parking spaces is a key determinant of mode choice and car usage." however, this is completely at odds with the experience of the rollout of Adamstown, with obvious issues with insufficient car parking spaces in the area. This proposed approach has to be realistically set against needs of the families who will live in Clonburris, many of whom will have multi-phase journeys to work or education and that public transport, even when established fully (and this will not be immediate - see Adamstown) may not serve the residents. Affordable purchase units get 1 parking space (so other categories get less?) which will be a source of discontent and friction in the area.

Archaeology

Under the "Archaeology" report: the following excerpt is of note: *"Archaeological testing was carried out in part of Site 3 during 2024 by Ian Russell of ACSU, under licence 24E0780. At the time of writing, this report or bulletin summary were not available for review. -*

It is essential that planned development at Kishoge be paused until access to the 2024 excavation report by Ian Russell be consulted, or at very least, consultation with Ian Russell happen to ensure that development will not proceed without correct excavation, or monitoring, for the site areas.

Biodiversity

Under the "Biodiversity" report: It makes for difficult reading with the loss and total destruction of many sites of importance for flora and fauna and runs to nearly 300 pages. The proposed developments in Kishoge will result in the complete or serious destruction of many habitats. The full set of proposals, mitigations, standards and remedial measures in the Environmental Impact Assessment need to be discussed during an Oral Hearing and furthermore be fully monitored and fully adhered to, and reviewed, at all stages during the project, with adequate enforcement measures.

Examples include: "The Kilmahuddrick Stream flowing west through the immature woodland to the north of Site 4, [is a...] habitat [that] is considered to be of county level ecological

importance due to the connectivity with the River Griffeen (370m downstream), as well as its capacity to support local fauna.

AND "Drainage ditches (FW4) [...] are present along a number of boundaries within and adjacent to Site 4. [...] This habitat is considered of high local ecological importance given its role in providing landscape connectivity with the surrounding landscape and surface water network (i.e., the Kilmahuddrick Stream) and its capacity to host a breeding grounds for local Common Frog.

AND "March (GM1) [...] This habitat is considered to be of high local ecological importance given its rarity, and the associated

flora, within the local landscape, as well as capacity to provide refuge and foraging opportunities for local fauna.

AND "Dry meadows and grassy verges (GS2) - Grassy verges are present north of the SDCC Parks Depot and between the sections of woodland in the northern section of the site. [...] This habitat is considered to be of high local ecological importance due to the variety of flora, including uncommon and rare red-listed flora as well as the variety of species utilising the habitat within the site.

Trusting the above points are considered in the Commission's adjudications and that our request for an Oral Hearing is positively considered

Yours sincerely,

Paul Gogarty TD

Cllr Helen Farrell