

ABP-322638-25

Kishoge Part X

South Dublin
County Council

Response to
Submissions.

SEPTEMBER 2025

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Table of Contents

1	INTRODUCTION	1
2	Prescribed Bodies and 3rd Parties	1
3	RESPONSE TO Submissions.....	1
3.1	Issue 1: Permeability Links: Local Opposition (Safety, Antisocial Behavior, Loss of Green Space & Private Amenity).	2
3.2	Issue 2: Proximity of Development to Railway Line and DART+ South West Infrastructure	4
3.3	Issue 3: Transport & Traffic: Existing Congestion, Inadequate Bus/Train Capacity and Parking Provision.....	9
3.4	Issue 4: Amenities & Services: Lack of Childcare, Retail, GP/Health, Youth and Sports Facilities/ Public Open Space- Sites 3, 4 & 5	11
3.5	Issue 5: Housing Mix: Call For More Social, Affordable, And Age-Friendly Housing- Sites 3, 4 & 5	14
3.6	Issue 6: Biodiversity & Heritage: Concerns Over Loss Of Habitats, Flora/Fauna, Archaeology- Sites 3, 4 & 5	15
3.7	Issue 7: Consultation & Oversight: Perceived Lack of Transparency and Meaningful Community Involvement- Sites 3, 4 & 5	15
3.8	Other matters- Sites 3, 4 & 5	15
4	Conclusion	15

1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners and Development Consultants, 26/27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by the Applicant, South Dublin County Council, County Hall Tallaght, Dublin 24, D24 A3XC, to make this submission to An Coimisiún Pleanála on its behalf, in response to the Commissions notification dated 12 August 2025.

This submission forms the Applicant’s Response to Prescribed Bodies’ and 3rd Parties’ Submissions made in respect of the proposed development subject of a Part X Planning Application to An Coimisiún Pleanála (ACP) ABP-322638-25 (and SDCC Reg. Ref. SDZ25X/0001), pertaining to:

Proposed mixed use residential-led development of 1,252no. dwellings, childcare, employment, retail and community uses, and associated site development works, at Kishoge Development Area, Clonburris SDZ, in the townlands of Kishoge, Esker South, Grange and Balgaddy, Clonburris, County Dublin.

We welcome this opportunity to provide further information and/or clarification to An Coimisiún Pleanála in relation to those specific matters raised in the submissions.

2 PRESCRIBED BODIES AND 3RD PARTIES

The following is a list of the Prescribed Bodies and the 3rd Parties who made submissions to ACP on the Part 10 Kishoge planning application, and which the Applicant’s submission responds to: -

- Commission for Railway Regulation
- Department of Housing, Local Government & Heritage- Development Applications Unit
- Irish Aviation Authority
- Iarnród Éireann
- Transport Infrastructure Ireland
- Uisce Éireann
- BPS Planning & Development Consultants on behalf of Tullyhall Residents Association
- Cllr. Liona O’Toole
- Cllr. Madeleine Johansson
- Eoin Ó Broin TD, Mark Ward TD, Derren Ó Bradaigh (Lucan Area Representative)
- Foxborough Maintenance Association
- Paul Gogarty TD & Cllr. Helen Farrell
- Paul O’Rourke

We have identified the issues raised in these submissions on site wide and site specific basis, as relevant. Where necessary to provide further clarity to ACP, we also attribute the commentary to the person or body that raised the issue.

3 RESPONSE TO SUBMISSIONS

The Applicant has gone to great length to ensure that a comprehensive planning assessment of the proposed development was provided to An Coimisiún Pleanála from a strategic infrastructure and policy basis and at a site specific context and development management level, having regard to the fixed and flexible objectives of the Clonburris SDZ Planning Scheme.

We refer the Commission to the Cover Letter, submitted with the application, which identifies an extensive list of supporting documents and assessment supporting the application. Of particular note, an Environmental Impact Assessment Report accompanied the application.

In preparing this response to the Commission, we note that the issues raised by 3rd Parties and Prescribed Bodies are not extensive and this is reflective of the comprehensive, transparent application and relatively prescriptive nature of the Clonburris SDZ Planning Scheme with respect to the location, type and scale of development that may be proposed within the plan boundary, character areas and sub-sites.

In summary, the following issues are identified as broadly capturing the content of the submissions made to the Commission:

- **Permeability Links: Local Opposition (Safety, Antisocial Behavior, Loss of Green Space)**
- Proximity of Development to Railway Line and DART+ South West Infrastructure
- Transport and Traffic Conditions and Public Transport Capacity
- Amenities and Local Services
- Housing Mix: Social, Affordable and Age-Friendly Housing
- Natural and Built Heritage
- Consultation & Community Engagement
- Other Miscellaneous Matters

The Applicant’s response is set out below, structured under the broad themes identified above.

3.1 Issue 1: Permeability Links: Local Opposition (Safety, Antisocial Behavior, Loss of Green Space & Private Amenity).

3.1.1 Permeability

Concerns have been raised regarding the proposed permeability links within **Sites 3 and 5**. In the submission made by BPS Planning & Development Consultants on behalf of Tullyhall Residents Association, particular concern was raised in respect of the vehicular, pedestrian and cycle access proposed from Tullyhall through to **Site 3**.

Cllr. Liona O’Toole further opposes the permeability links that *“alter the character and safety if estates like Foxborough, Tullyhall, Rossberry and Oldbridge”*. Cllr. Madeleine Johansson, Eoin Ó Broin TD, Mark Ward TD, Derren Ó Bradaigh (Lucan Area Representative), Paul Gogarty TD and Cllr. Helen Farrell further echo this sentiment.

Foxborough Maintenance Association consider that the proposed pedestrian connection from Foxborough Court to **Site 5** is *“unnecessary and obtrusive and will result in negative impacts on residents”*.

Figure 2.2.7 of the Planning Scheme outlines the fixed and flexible Overall Movement Concept for Clonburris Planning Scheme. The proposed development is consistent with the layout and connections identified in the Clonburris SDZ Planning Scheme.

As detailed on page 41 of the Architectural Design Statement, prepared by O’Mahony Pike Architects, the Site 3 proposal has two physical connections into adjoining estates: one vehicular, cycling and pedestrian connection via Tullyhall Rise (C), and one cycling and pedestrian connection via Rossberry Park (B). Potential future pedestrian and cycling connections are indicated at Oldbridge Grove (F) and Tullyhall Drive (E), they are facilitated for future use, but not currently proposed part of this application.

The SDZ Planning Scheme indicates connections at Tullyhall Rise (C), Tullyhall Crescent, Rossberry Terrace and Rossberry Park (B). As noted in the detail design consideration on page 19 of the

Architectural Design Statement, only Tullyhall Rise and Rossberry Park can be delivered due to private ownership issues at the adjoining Cul-de-sacs.

A Stage 1 Road Safety Audit was provided in Appendix D of the Site 3 - Infrastructure Design Report. It did not identify any road safety issues with the intimate street connection to Tullyhall Rise at location C.

The applicant has maintained a vehicular connection to Tullyhall Rise, as in the Planning Application Reg. Ref. SDZ22A/0001 & SDZ23A/0033 submitted by ESB Telecoms Ltd, a Right of Way is shown on Site Location Maps connecting through to Tullyhall Rise.

The proposed intimate street connection to Tullyhall Rise is consistent with the SDZ Planning Scheme. If deemed necessary, a hammerhead cul-de-sac could also be provided and has been tested to be feasible from a technical point of view.

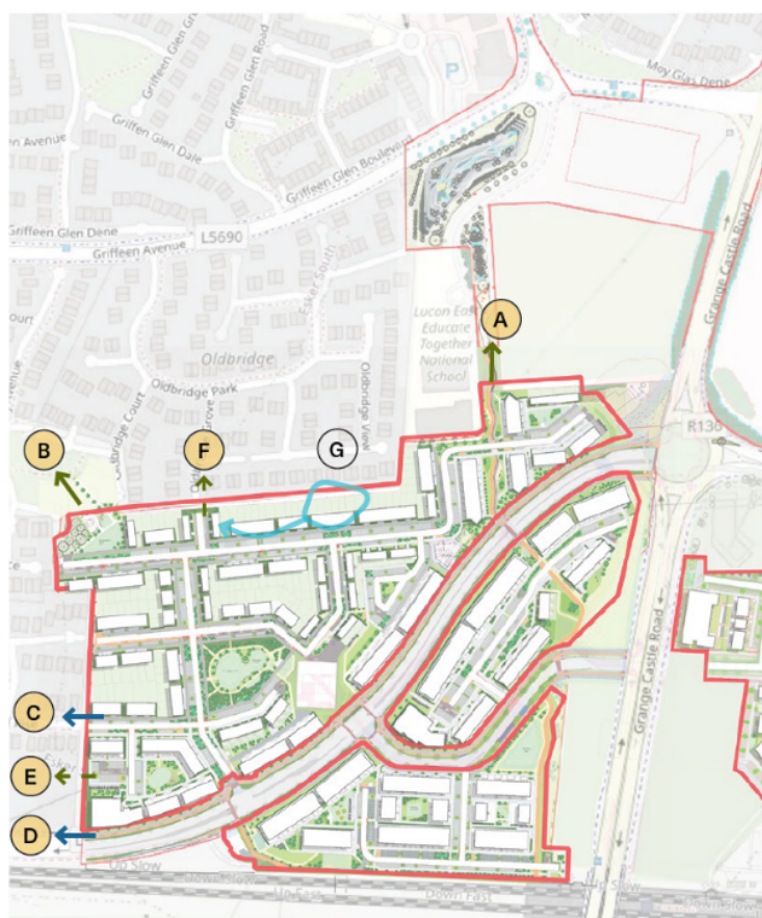


Figure 1: Extract from the submitted Architectural Design Statement, prepared by O'Mahony Pike Architects

During the **Site 5** design process, South Dublin County Council has taken into account the views of Foxborough residents regarding the proposed local street connection outlined in the SDZ (see p.29 of the MDO KSG-5 Architectural Design Statement). The original plan for a vehicular street connection between the development and Foxborough was reconsidered to a green corridor and pedestrian link. This revised connection will not only improve access to Griffen Community College but also enhance wider pedestrian and cycle networks, supporting sustainable travel and promoting stronger integration with the existing urban fabric.

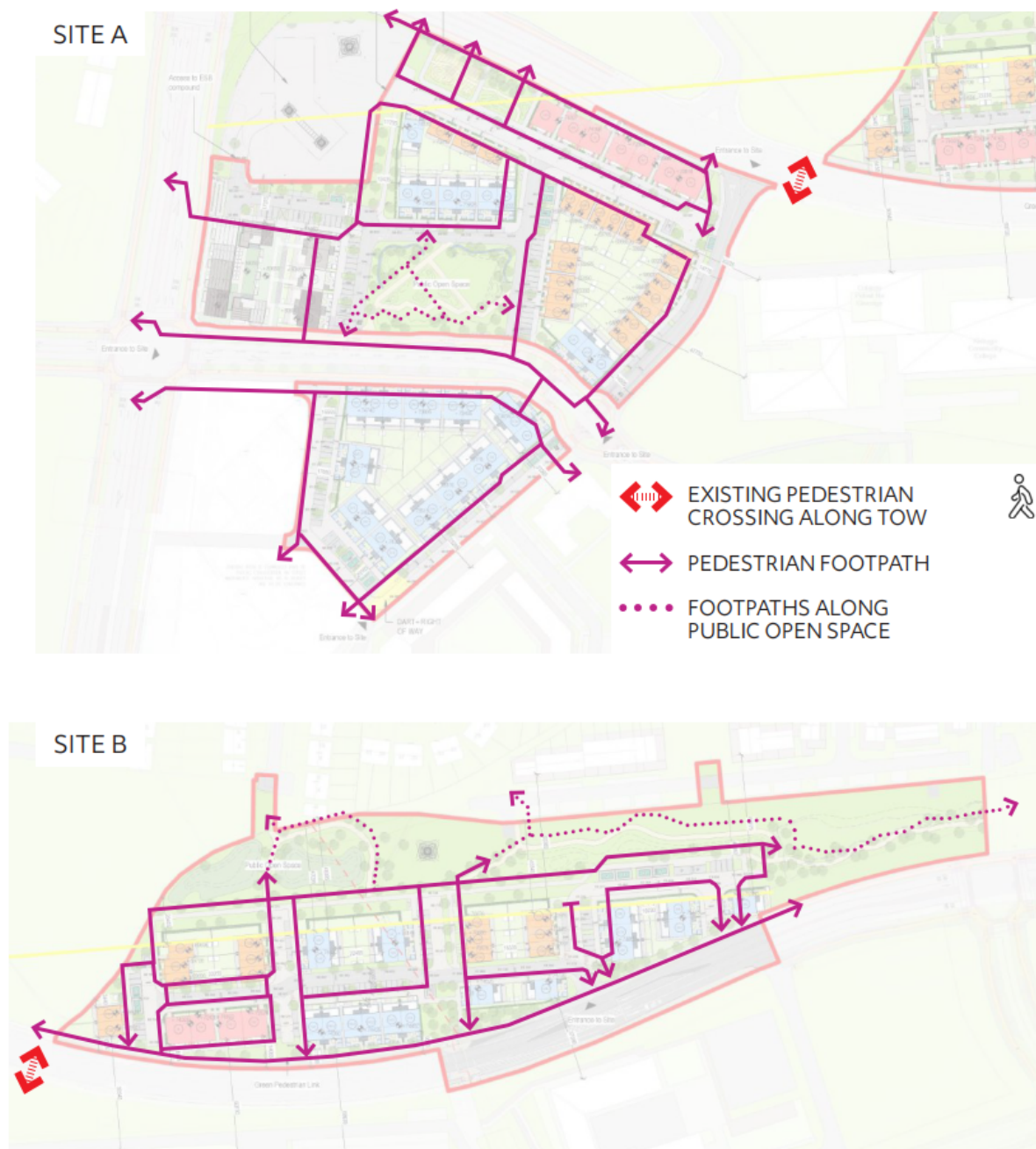


Figure 2: Inclusivity and Access Diagram from MDO Architectural Design Statement.

3.1.2 Loss of Private Amenity

BPS Planning & Development Consultants on behalf of Tullyhall Residents Association has requested that *“any new homes built immediately adjacent to the existing two-storey homes in Tullyhall... should themselves be two storeys in height”*.

The proposal is consistent with the building height ranges of the SDZ Planning Scheme. Where adjacent to existing gardens, first floor balconies will have appropriate screens to minimise potential overlooking issues.

3.2 Issue 2: Proximity of Development to Railway Line and DART+ South West Infrastructure

3.2.1 Site Ownership- Sites 3, 4 & 5

In the submission made by Iarnród Éireann it is highlighted that the proposed development is in close proximity to the DART+ South West Project. It is further noted that a “*preliminary review of the submitted boundary for the proposed development suggests there may be overlaps or conflicts with these designated lands*”.

The application red-line boundary corresponds to the surveyed fence-line, north of the railway in **Site 3**. This existing fence is located c.4m north of the railway line. In addition, a minimum 20-metre railway buffer zone is maintained from the northern edge of the railway line within Site 3, with a strategic green corridor running parallel to the railway. Property plans and boundary sections can be provided to Iarnród Éireann for coordination; however, no conflicts are noted by the Site 3 team.

The application red-line boundary aligns with the surveyed fence line located to the south of the railway within **Site 4**. This existing fence is nominally 7m south of the railway line. Property plans and boundary sections can be provided to Iarnród Éireann to support coordination, although the Site 4 team has identified no boundary conflicts. In addition, a minimum 20-metre railway buffer zone (designated no-build area), is maintained from the southern edge of the railway line within Site 4.

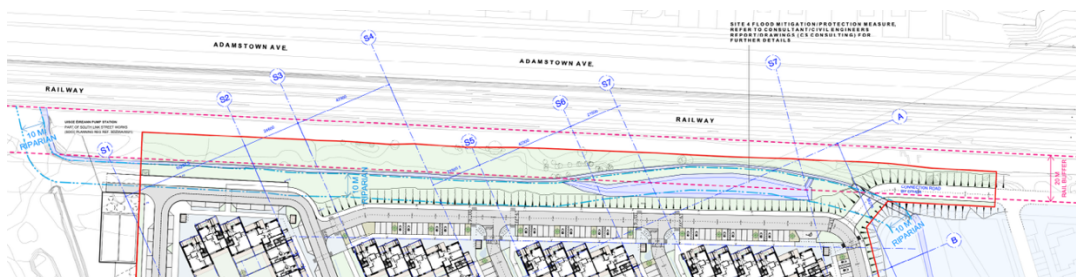


Figure 3: Extract of Site 4 Proposed Site Layout Plan: KSG4-DTA-00-SP-DR-A-1000

Iarnród Éireann further identify that C.I.É owns a section of Lynch’s Lane and request that the access route at the lane is maintained and kept clear at all times.

The section of Lynch’s Lane noted in the observation has been excluded from the Applicant’s blue-line boundary. Refer to drawings KSG-OMP-01-00-DR-A-1010 : Site Location Map Combined, and KSG-OMP-01-00-DR-A-1014, prepared by O’Mahony Pike Architects. As required by Iarnród Éireann, access via Lynch’s Lane will be preserved as part of the proposed development. Refer to **Site 5** drawing KSG5-MDO-XX-SP-DR-A-05001, prepared by McCauley Daye O’Connell Architects.



Figure 4: Extract of Site 5 Site Layout Drawing No. KSG5-MDO-XX-SP-DR-A-05001, prepared by McCauley Daye O’Connell Architects identifying the DART+ Right of Way.

3.2.2 Consultation with Iarnród Éireann- Sites 3, 4 & 5

Iarnród Éireann identify that “early engagement and agreement between all relevant parties is strongly advised to ensure that the proposed development does not interfere with the future operation of the DART+ South West Project”.

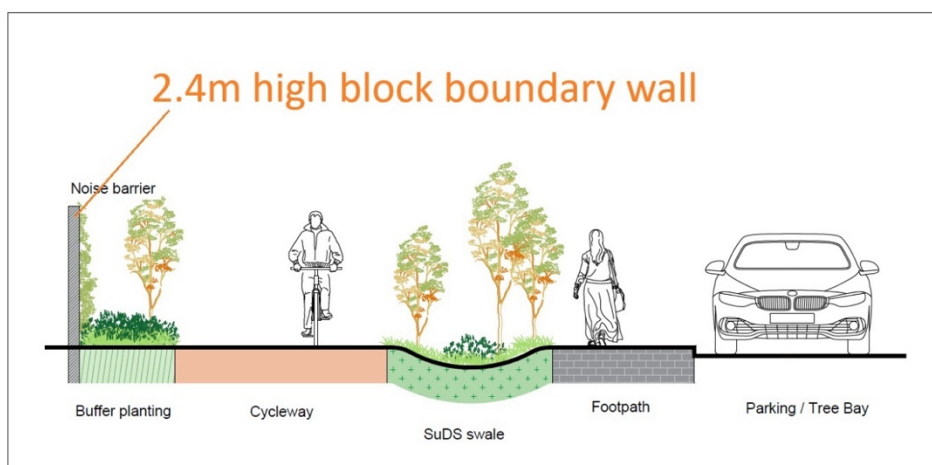
It should be noted that, prior to lodgement of this application, a number of coordination meetings were held, and relevant drawings shared between:

- The applicant’s Site 3 Design Team
- South Dublin County Council
- Clonburris Infrastructure Limited
- Iarnród Éireann
- ESB

This included a meeting between Clonburris Infrastructure Limited, Iarnród Éireann, & ESB on 19 December 2024, and Clonburris Infrastructure Limited, SDCC (the applicant), Site 3 design team, & ESB on 24 January 2025.

3.2.3 Boundary Treatment- Sites 3 & 4

Iarnród Éireann request that a 2.4m high solid block boundary treatment is erected by the applicant, on the applicants’ side of the property boundary along the interface of the proposed development and railway line. As required by Iarnród Éireann, a 2.4m block boundary wall will be erected on the applicant’s side of the property boundary. Such a wall is indicated on the Landscape Section through the Green Link, drawing no. KSG3-DOT-LS-02-DR-L-0000 for Site 3.



East-West Green Link Section

Figure 5: Extract from Landscape Section through Green Link KSG3-DOT-LS-02-DR-L-0000, prepared by Doyle O’Troithigh Landscape Architects

We would welcome the inclusion of a condition, if deemed necessary by the Commission, requiring that the boundary treatment adjoining Irish Rail lands at **Site 4** be agreed with Irish Rail.

3.2.4 Proximity of Development to Temporary Compound & Underground Cables- Site 3

Iarnród Éireann raise concerns with location of the proposed buildings on top of its temporary compound for the DART+ South West works and is proximate to its proposed cable easements.

We would highlight that the proposed layout is compliant with the Clonburris Planning Scheme at this location for the delivery of housing. We do however note the conflict between the Railway Order

and the SDZ and have endeavored to comply with the SDZ whilst meeting Iarnród Éireanns technical requirements.

Regarding the lands identified for temporary acquisition on Site 3 for the delivery of Dart + SW, where a temporary compound is indicated, this area is in phase 3D of Figure 2.1 of the Applicant’s Preliminary Construction & Environmental Management Plan, prepared by DBFL Consulting Engineers. This is intended to be the last phase of the construction phasing for Site 3. It will be constructed after the DART+ infrastructure has been delivered and the DART+ temporary compound is no longer in place.

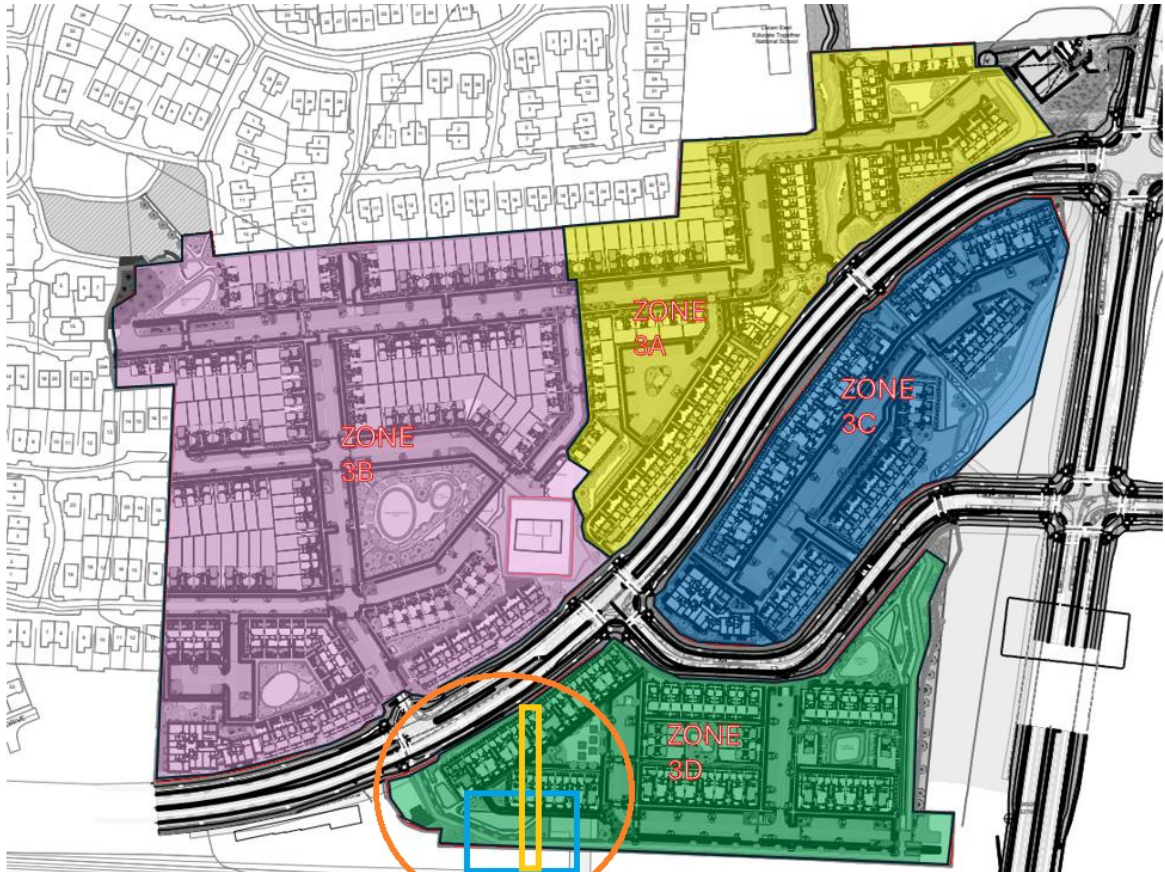


Figure 6: Extract from the submitted Preliminary Construction Environmental Management Plan, prepared by DBFL Consulting Engineers Indicative Phasing Plan with Zone 3D impacted by temporary lands acquisition highlighted.

The easement shown in the Dart+ Railway Order Property Plan for a 10KV underground crossing would result in the loss of c.15 units and an incomplete building frontages to Adamstown Avenue and the Railway Line (see Figure 7 below). The applicant has proposed an adjusted route through the planning scheme road network which is indicated on Drawing No. KSG3-MAE-00-XX-DR-E-6010, prepared by MandE.

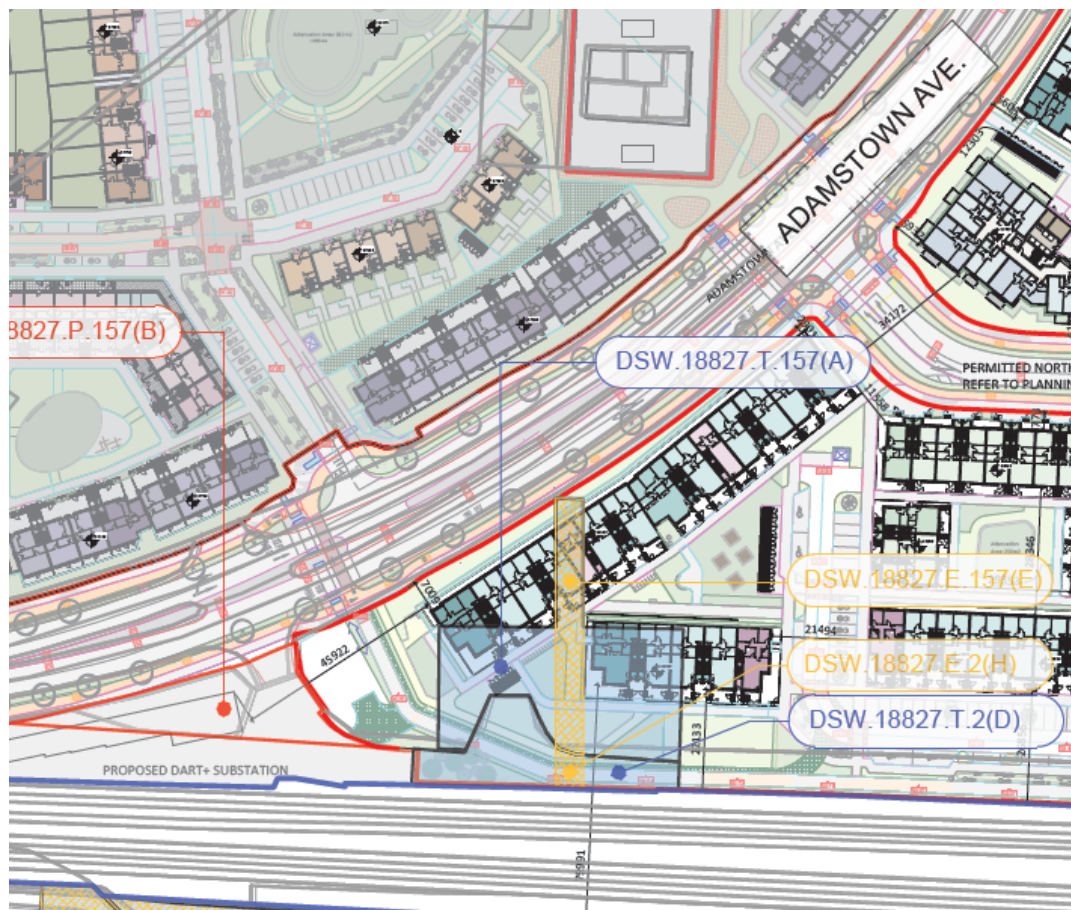


Figure 7: Overlay of Dart+ Property Plan on Site 3 Layout showing potential impact of Proposed Easement.

The future 38kV ESB underground track crossing has been discussed by numerous parties through coordination meetings and through sharing of relevant drawings. These parties include the Applicant’s Design Team, SDCC, Clonburris Infrastructure Limited (CIL), ESB and Iarnród Éireann. A utilities route that functions similarly and works with the applicant’s scheme has been coordinated between Site 3, CIL, SDCC and ESB (Fig 8). Coordination will continue as required between relevant parties going forward.

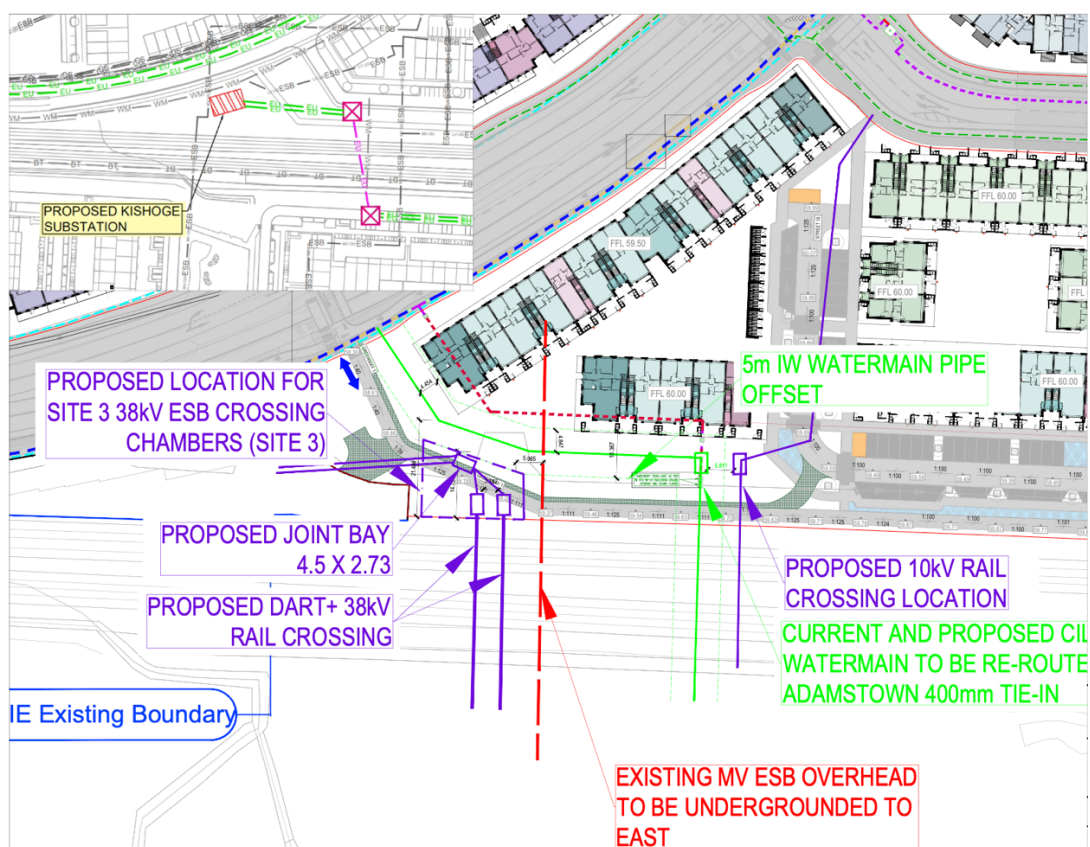


Figure 8: CIL/Kishoge Site 3 Utilities Coordination

For the lands identified for permanent acquisition by Iarnród Éireann adjacent to Site 3, where a 38kV electrical traction substation and access are located, both are located outside of the application boundary, to the west, and not impacted by this application.

3.2.5 Flood Compensation Storage Area

In their submission, Iarnród Éireann requested clarification on the proposed flood compensation area within Site 4, specifically whether this feature would impact railway land or infrastructure. As part of the application, a Flood Risk Assessment for Site 4 was prepared by JBA Consulting and subsequently peer-reviewed by McCloy Consulting.

JBA Consulting confirm in response to this concern that,

“The FRA confirms that there is no increase in risk to third party lands and that includes the Irish Rail property adjacent to the northern site boundary. A 170m³ flood storage area is located to the south of the Kilmahuddrick channel (on the opposite side of the channel from the railway line) to offset the loss of floodplain storage at the 0.1% AEP event further upstream. The storage area only becomes effective at a flood event of 1% AEP or greater and it routes some flow further away from the boundary of the railway. The levels/flows in the stream are therefore not increased adjacent to the railway and the compensatory storage is located as far from Irish Rail lands as possible. In addition, the storage area will not impact groundwater conditions on Irish Rail property and flooding to Irish Rail property is not increased.”

3.3 Issue 3: Transport & Traffic: Existing Congestion, Inadequate Bus/Train Capacity and Parking Provision.

3.3.1 Traffic & Transport- Sites 3, 4 & 5

There are site wide concerns raised about traffic congestion, public transport capacity and car parking provision

The submission made by BPS Planning & Development Consultants, on behalf of Tullyhall Residents Association raises concern with the current road safety challenges in the area and note that a number of road safety incidents have occurred in the last number of years. The submission seeks clarification as to whether a Road Safety Audit was submitted for the application.

Cllr. Madeliene Johansson notes that *“transport in the area is already under severe constraints”* while Foxborough Maintenance Association raise concern with traffic congestion along Balgaddy Road. Foxborough Maintenance Association further note that the *“level and frequency of public transport is not sufficient to meet the demand of Foxborough and the surrounding areas”*.

Paul Gogarty TD and Cllr. Helen Farrell note that *“there is updated information on bus networks, which remain wholly insufficient to serve such a high-density diverse population with complex transport requirements”*. This submission also raises concerns with the level of traffic congestion across the SDZ Planning Scheme area.

The submission by Paul O’Rourke further raises concerns with traffic congestion, specifically on Griffeen Avenue noting that *“associated with the developments of Sites 3, 4 & 5 will be an increase of traffic along the R136”*.

The proposed development as submitted to An Coimisiún Pleanála has been subject of an Environmental Impact Assessment Report (EIAR). The Applicant is satisfied that Appendix 13.2 (Traffic & Transportation Assessment) of the EIAR reasonably addresses the concerns raised in these submissions by concluding the following: -

“9.2 Summary

The findings of the analysis summarised within this Traffic and Transport Assessment are as follows:

- *Good quality cycle / pedestrian infrastructure is available in the vicinity of the subject sites.*
- *The sites benefit from very good public transport accessibility levels with both bus and rail services operating close to the sites.*
- *The subject proposals comply fully with the development plan’s cycle parking requirements.*
- *An appropriate quantum of car parking spaces has been provided for the proposed developments.*
- *Historic traffic counts were obtained via the planning application for the Clonburris Stage 2 Infrastructure; the historic baseline data was retrieved from the South West Dublin Local Area Model which supported the Clonburris SDZ assessment. This report was analysed with the objective of establishing local traffic characteristics in the immediate area of the proposed developments.*
- *It is established that, for Junctions 1, 2 and 6 for all design years, the Do-Something scenario is estimated to have a sub-threshold impact.*
- *TRANSYT analysis for Junctions 3, 4 and 5 shows an oversaturated performance during the morning and evening peak hours in the Do-Nothing and Do-Something scenarios. This result is expected and consistent with the Traffic & Transport Assessments of the Southern Link Street – Clonburris SDZ and Clonburris Stage 2 Infrastructure, prepared by DBFL Consulting Engineers. These documents showed an oversaturated network for Opening Year and Future Horizon Year, similar to results obtained above. It is important to note that the analysis has assumed the pedestrian stage will be called during every cycle. As such the TRANSYT analysis represents a worst-case scenario, with the junctions likely performing better than the TRANSYT results indicate. Additionally, the area will be served with high frequency bus & rail services, high quality cycle infrastructure and new road developments.*

9.3 Conclusion

It has been demonstrated that the subject proposals will not result in a material deterioration of local road conditions above that which is already forecast.

In conclusion, we believe that the opportunity is available, in terms of transport and traffic, for the planning authority to consider favourably the proposed development on the subject sites. Accordingly, it is concluded that the proposals represent a sustainable and practical approach to redevelopment on the subject lands and there are no traffic or transportation related reasons that should prevent the granting of planning permission for the proposed developments."

3.3.2 Car Parking Provision- Sites 3, 4 & 5

Paul Gogarty TD and Cllr. Helen Farrell consider in their submission that car ownership is still a necessity and note that the *"proposed parking spaces of less than 1 space per residential unit is completely insufficient"*.

The submission made by BPS Planning & Development Consultants, on behalf of Tullyhall Residents Association notes that *"existing car parking is already constrained... The proposed development risks worsening these shortages without sufficient new provision"*.

We note that the Clonburris SDZ Planning Scheme does not prescribe car parking standards, as such, we defer to Section 12.7.4 of the County Development Plan which outlines car parking standards for new developments. The proposed development is located within Zone 2.

Table 12.26 of the Development Plan outlines **maximum parking rates for residential development** while 12.25 outlines **maximum parking rates for non-residential development**.

At **Site 3**, the maximum quantum of car parking spaces for residential development is 657no. spaces while the maximum quantum for the creche use is 3no. spaces. It is therefore proposed to provide 456no. spaces, including 23no. accessible spaces and 3no. creche spaces, in accordance with the Development Plan requirements.

At **Site 4**, the maximum quantum of car parking spaces for residential development is 505no. spaces while the maximum quantum for the non-residential uses is 33no. spaces. It is therefore proposed to provide 408no. surface car parking spaces including 8no. creche spaces, 5no. retail spaces, 2no. employment spaces and 9no. community spaces.

At **Site 5**, the maximum quantum of car parking spaces for residential development is 259no. spaces. It is therefore proposed to provide 219no. spaces, in accordance with the Development Plan requirements.

We refer to Appendix 13.2 (Traffic & Transportation Assessment) of the EIAR and Section 10.5 of the Part X Planning Application Report, as submitted to An Coimisiún Pleanála, which further confirms that the quantum of car parking is in accordance with the Clonburris SDZ Planning Scheme and South Dublin County Development Plan.

3.4 Issue 4: Amenities & Services: Lack of Childcare, Retail, GP/Health, Youth and Sports Facilities/ Public Open Space- Sites 3, 4 & 5

There are general concerns raised about the general lack provision of amenities and services such as childcare, retail, GP/health, youth and sports facilities.

In the submission made by Paul O'Rourke, Mr. O'Rourke objects *"to the lack of recreation in Site 3"* noting that *"there is a real need for all weather sports facilities"*.

Paul Gogarty TD and Cllr. Helen Farrell note that *"retail provision has so far been minimal... 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"*.

Foxborough Maintenance Association note that *"there is scant detail on essential services in the plan such as retail, health and youth facilities"* and that *"there is a shortage of facilities for teenagers in the immediate area"*.

Cllr. Madeleine Johansson raises concern about “the low amount of retail and community space on these 3 sites” while Cllr. Liona O’Toole notes the “need for dedicated play spaces and youth facilities”.

The submission made by BPS Planning & Development Consultants on behalf of Tullyhall Residents Association notes that “the proposal includes no new amenities to serve an increased population”.

We refer to Sections 11 to 14 inclusive of the Part X Planning Application Report as submitted to An Coimisiún Pleanála, which confirm how the mix of non-residential uses proposed are in accordance with the provisions of the Clonburris SDZ Planning Scheme.

We refer the Planning Authority to Sections 3.4.1 and 3.4.2 below which confirm that the proposed non-residential uses are provided in accordance with the Clonburris SDZ Planning Scheme.

3.4.1 Childcare Facilities

In relation to childcare, the Clonburris SDZ Planning Scheme seeks to:

“facilitate the sustainable development of good quality and accessible early childhood care (early years and general childcare both home based and centre based) and education infrastructure”. It is further stated that “the Scheme supports the co-location of purpose built childcare facilities with primary schools and supports the provision of purpose built childcare facilities adjacent to existing or planned primary schools. Early childhood care in residential units should only be provided at an appropriate scale to complement purpose built facilities and are subject to appropriate safeguards. Childcare facilities should be within walking and cycling distance of educational, community facilities and employment locations”.

The Planning Scheme is not prescriptive in respect of the quantum of childcare spaces that should be provided at any given site. The Applicant has therefore had regard to the Childcare Facilities: Guidelines for Planning Authorities (2001).

Section 2.4 of the Guidelines set out general standards for the land use planning issues related to childcare provision in Ireland.

The Guidelines recommend childcare provision on the basis of 20no. childcare spaces for every 75no. dwellings permitted in a new residential scheme. The latest Planning Design Standards for Apartments Guidelines for Planning Authorities published in 2025 provides further clarification with regards to childcare provision:

“One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms.”

The proposed development as submitted to An Coimisiún Pleanála accommodates a total of 1,252no. dwellings, including 242no. 1-bed units, 435no. 2-bed units, 567no. 3-bed units and 8no. 4-bed units in a mix of houses, triplexes, duplexes and apartments.

Having regard to the provisions of Section 4.7 of the Childcare Guidelines, arguably 1-bed and 2-bed apartment units (677no.) can be discounted from the calculation of childcare space quantum requirements. Thereafter, a total 575no. 3-bed and 4-bed dwellings are proposed. This gives rise to a requirement for 153no. childcare spaces.

The proposed development as submitted to An Coimisiún Pleanála provides 2no. childcare facilities with a capacity of c. 200no. childcare spaces, 1no. located in Site 3 (c. 553sqm) which caters for c. 100no. children and 1no. located in Site 4 (c. 544sqm) which also caters for c. 100no. children.

The proposed childcare facility at Site 3 is in close proximity to the existing Lucan East Educate Together National School to the north. While the proposed childcare facility at Site 4 is located within the vicinity of the ‘Grange Local Node’ indicated by the Planning Scheme. Based on all the information submitted to An Coimisiún Pleanála, the Applicant is satisfied that the locations of both childcare facilities have been carefully considered and have had due regard to the provisions made in the Planning Scheme.

3.4.2 Other Non-Residential Development

Section 3.4.1 above confirms that childcare facilities are proposed at Site 3 and Site 4. Retail and community uses are proposed at **Site 4**. Table 3.3.8 of the Planning Scheme requires that the following non-residential floor area quantum is accommodated within the Kishoge South West Development Area:

- Non-retail commercial development – 200 sq m minimum
- Retail development – 550 sq m maximum
- Community – 600 sq m minimum

Within proposed **Site 4** (containing sub-sectors KSW-S1 and part of KSW-S2), Block F includes c.150sqm retail unit and a c.544 sq m childcare facility (with play area) at ground level, within the vicinity of the ‘Grange Local Node’ indicated by the Planning Scheme. The Planning Scheme categorises ‘Childcare Facilities’ as a ‘Community Use’. However, this arguably also functions as a ‘non-retail commercial development’ or employment provider. We would further highlight that, within the north western corner of Site 4, a community building (c. 683 sq m) is proposed fronting Griffeen Valley Park area.

Employment use (c.170 sq m) is envisaged as part of the reuse of Grange House in the south east corner of Site 4. Grange House will also benefit from proposed amenity open space, which will provide a public amenity and a buffer to this building of local heritage interest. The exact nature of the employment use and any works required to Grange House to facilitate this will be subject of a separate future application.

We would therefore submit that the proposed retail, employment and community facilities within Site 4 (sub-sectors KSW-S1 and KSW-S2) are consistent with the maximum retail/retail services and minimum commercial and community use quantum requirements of the Planning Scheme for Kishoge South West. They are also consistent with the Planning Scheme objective to locate a local park node and community facilities fronting Griffeen Valley Park along the western edge of Site 4, and to identify a use for Grange House.

Non-Resi Floor Space	Planning Scheme Requirement	Proposed in Site 4
Community	600 sqm min.	c. 683.0 sqm
Retail	550 sqm max.	c. 150.0 sqm
Non-retail commercial development / Employment	200 sqm min.	c. 544.1 sqm

Figure 9: Extract from Section 13, Table 7 of the Planning Report & Statement of Consistency, prepared by Stephen Little & Associates

3.4.3 Greenspace/Public Open Space

In their submission, Paul Gogarty TD and Cllr. Helen Farrell raise concerns about the insufficient space for additional GAA pitches within the SDZ. While this issue cannot be resolved within the scope of the current application, it is worth noting that Clonburris Infrastructure Limited submitted an application on 01 August 2025, proposing the development of three strategic public parks within the Clonburris SDZ and includes various GAA / soccer pitches.

In addition, we can confirm that Public Open Space is provided in accordance with Figure 2.1.2 of the Planning Scheme.

The proposed development provides c. 10,598 sqm of public open space, located within Site 3, Site 4 and Site 5: -

Proposal	Site 3	Site 4	Site 5	Total
Public open space (sq m)	7,015	778	3,101	10,894

Table 1: Breakdown of public open space provision

Each site facilitates the creation of local green infrastructure networks, where planting, pedestrian and cycling facilities are proposed, connecting to the railway station, Grand Canal corridor and/or public parks. Each site contains a network of street trees aligned with the road network.

Site 3 has three local parks and Site 5 has one. Site 4 is bordered by two strategic public open spaces, the Griffeen Valley Park extension and a linear park bordering Site 1 (east of Site 4).

Based on all the information submitted to An Coimisiún Pleanála, the Applicant is satisfied that the proposed development is consistent with the fixed and flexible provisions of the statutory Clonburris SDZ Planning Scheme, for the subject sites within the Kishoge Character Area.

The preparation of the SDZ Planning Scheme has been subject of public consultation at local level, democratically adopted by the Elected Members of the Council. It was subject of further appeal and independent assessment and approval by An Coimisiún Pleanála. ACP is therefore also obliged to assess and determine the merits of the application in the context of the fixed and flexible objectives of the statutory Planning Scheme.

3.5 Issue 5: Housing Mix: Call For More Social, Affordable, And Age-Friendly Housing- Sites 3, 4 & 5

3.5.1 Provision of Social Housing

Cllr Madeleine Johansson considers that *“the percentage of social housing should be increased so as to have a substantial impact on the housing waiting list in the county”*.

Section 2.1.6 of the SDZ Planning Scheme addresses social housing, stating that: -

“All development shall comply with the requirements of Part V of the Planning and Development Act, 2000 - 2016 (as amended) and with the South Dublin County Council Housing Strategy with regard to the provision of Social and Affordable Housing (if further amended)”.

In accordance with the above, it is South Dublin County Council’s strategy to provide only social and affordable housing on their lands. Social units account for 33% of the allocation while affordable units account for 67% in accordance with the SDZ Planning Scheme.

3.5.2 Step-down Housing Provision

Cllr. Liona O’Toole considers that *“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 Lucan Area”*.

The proposed development as submitted to An Coimisiún Pleanála provides 3no. 1-bedroom age-friendly apartments accommodated in a 1-storey apartment building within Site 4. The overall unit mix as submitted to An Coimisiún Pleanála is in accordance with the South Dublin County Development Plan 2022-2028.

We further refer to Sections 11 to 14 inclusive of the Part X Planning Application Report as submitted to An Coimisiún Pleanála, which confirm that the housing mix is in accordance with the provisions of the Clonburris SDZ Planning Scheme.

3.6 Issue 6: Biodiversity & Heritage: Concerns Over Loss Of Habitats, Flora/Fauna, Archaeology- Sites 3, 4 & 5

There are general concerns raised about biodiversity and natural heritage over the loss of habitats, flora/fauna and archaeology.

Paul Gogarty TD and Cllr. Helen Farrell consider that *“the proposed developments in Kishoge will result in the complete or serious destruction of habitats”*. The submission made by BPS Planning & Development Consultants raises a number of concerns relating to the impact on mature trees and wildlife and the ongoing disruption to local wildlife.

The proposed development, as submitted to An Coimisiún Pleanála, has been subject of an Environmental Impact Assessment Report (EIAR). The Applicant is satisfied that Chapter 6 (Biodiversity) of the Environmental Impact Assessment Report prepared by JBA consulting engineers and the Appropriate Assessment Screening Report, prepared by Minogue & Associates Ecological Consultants have adequately considered the impact of the proposed development on biodiversity and natural heritage in combination with the relevant conditions.

Chapter 16 (Cultural Heritage) of the Environmental Impact Assessment Report as submitted to An Coimisiún Pleanála considers the impact of the proposed development on cultural heritage, both archaeological and architectural. The Applicant is satisfied that cultural heritage has been adequately addressed in combination with the relevant conditions for Licensed Archaeological Monitoring.

3.7 Issue 7: Consultation & Oversight: Perceived Lack of Transparency and Meaningful Community Involvement- Sites 3, 4 & 5

The topic of public consultation has been raised in a number of submissions. Cllr. Liona O’Toole seeks to reinstate a Part 8 Public Consultation on Permeability.

In relation to public engagement with the SDZ planning scheme, the Planning Scheme has already gone through public consultation, was adopted by SDCC Councillors, was appealed, was independently assessed and ultimately approved by An Coimisiún Pleanála.

We note that the proposed development is a Part X Planning Application (made directly An Coimisiún Pleanála) which seeks approval for residentially-led development by South Dublin County Council, that requires Environmental Impact Assessment.

Any member of the public (or prescribed bodies) has had the opportunity to make a submission/observation within 6 weeks of the application being lodged. The commission also has discretion to hold a public oral hearing which if granted, members of the public and interest groups can attend, give evidence, and cross-question. In making its final decision the commission will have regard to the 3rd party and prescribed body engagement.

3.8 Other matters- Sites 3, 4 & 5

The Irish Aviation Authority (IAA) have requested that the applicant should be conditioned to notify the Authority, Weston Airport and Casement Aerodrome of the intention to commence crane operations with at least 30 days prior notification of their erection.

The applicant is satisfied to accept a standard planning condition relating to this matter.

4 CONCLUSION

We do not consider that the observations made to the commission, in respect of the Applicant’s Part X Planning Application to An Coimisiún Pleanála, raise any significant new issues that the Applicant has not already comprehensively dealt with through the Part X Planning Application made to An Coimisiún Pleanála (ACP).

It remains our opinion based on all the information submitted to An Coimisiún Pleanála, the Applicant is satisfied that the proposed development is complying with the provisions of the

statutory SDZ Planning Scheme. The SDZ Planning Scheme has already went through public consultation, was adopted by SDCC Councillors, was appealed, was independently assessed and ultimately approved by An Coimisiún Pleanála.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this submission in respect of planning application ACP Reg Ref ABP-322638-25 (SDCC Reg. Ref. SDZ25X/0001).

STEPHEN LITTLE & ASSOCIATES

04 September 2025

Stephen Little & Associates are committed
to progressing and achieving sustainable
development goals.

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