

**Submission to the Dun Laoghaire Rathdown County Council
on the
Dun Laoghaire Rathdown County Development Plan 2022-2028
Proposed Variation No. 1**

19 January 2026



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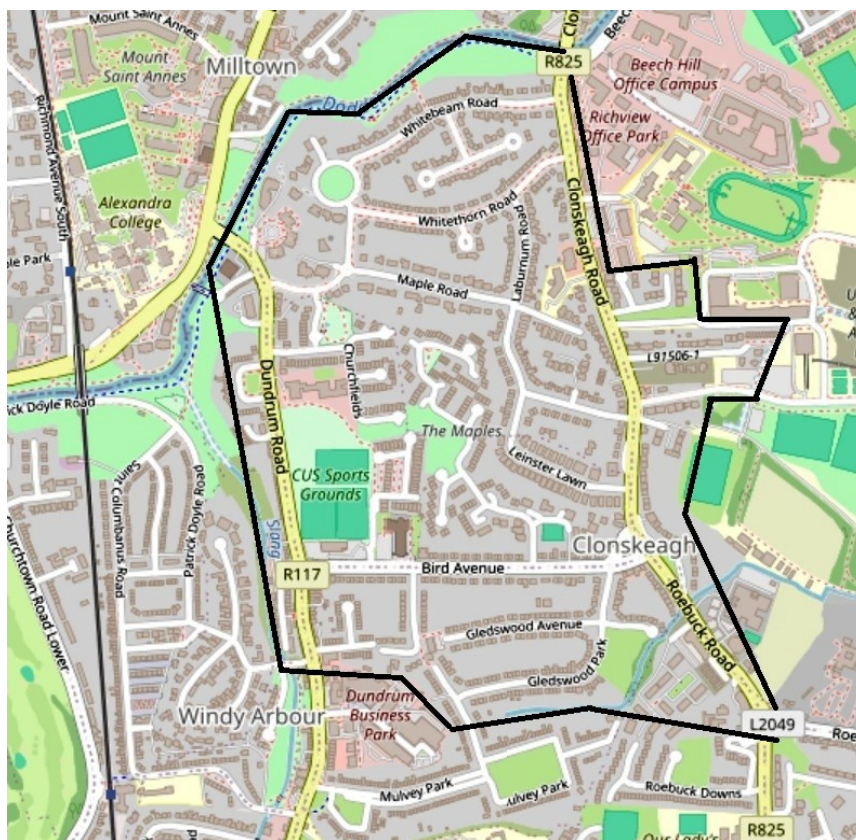
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OUR CREDENTIALS

Clonskeagh Residents' Association represents residents living in Clonskeagh in an area delineated by:

- The River Dodder to the north
- Clonskeagh Road to the east
- A line from the Roebuck Road-Goatstown Road junction westwards to the north of the Dundrum Business Park and
- The River Slang to the west.

This area has a population of some 4,400 residents with some 1,200 private houses and apartments.



This document has been approved by the Committee of the Clonskeagh Residents' Association prior to its submission.



PROPOSED VARIATION NO. 1

Following the publication of a number of national housing policies and guidelines in 2024 and 2025, the Minister for Housing, Local Government & Heritage's directed the Council to incorporate these into the County Development Plan 2022-2028.

These national policies and guidelines are:

- National Planning Framework First Revision April 2025
- NPF Implementation – Housing Growth Requirements for Planning Authorities 2025
- Planning Design Standards for Apartments, Guidelines for Planning Authorities July 2025
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

These national policies and guidelines seek to enable the acceleration of residential developments, particularly apartments, in the County by increased national standardisation of the physical planning requirements.

The Proposed Variation No. 1 contains a substantial volume of housing-related changes to the original County Development Plan 2022-28, covering inter alia residential housing development volumes, residential density, size and mix, and, various specifications for apartments.

While the Plan's focus on increased housing provision is welcome, the Association wishes to share its views on the following elements of the proposed revised County Development Plan:

- Apartment Mix
- Liveable housing
- Classification of Proximity and Accessibility of Public Transport Services
- Application of Classification of Proximity and Accessibility to Clonskeagh
- Transport Provision



APARTMENT MIX

The original County Development Plan 2022-2028 permitted apartment development within certain constraints.

Specific Physical Policy Recommendation 1¹ in the original County Development Plan set certain limits on the mix of apartments in a development, stating: *“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).”*

Regrettably the recent Ministerial direction removes these apartment mix limits from the County Development Plan, with this statement²:

“A. With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

B. Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.”

The Association is quite concerned that new apartment developments will comprise mainly studio and one-bedroom apartments and so not reflect reasonably the likely variety of apartment sizes being sought in the market.

¹ County Development Plan 2022-2028 Appendix 13 Table 2 Page 350

² County Development Plan 2022-2028 Proposed Variation No. 1 Item 65 Table 2 Page 42

LIVEABLE HOUSING

The County Development Plan sets *“out an approach centred on the core principle of sustainability with a focus on creating vibrant, **liveable**, climate resilient communities³.”* The Plan aspires for *“a **liveable** County, where our necklace of towns and village and the surrounding neighbourhoods work better for the people who use them. It should be a County where residents, workers and visitors alike can access transport options, housing, services and amenities including heritage, culture, recreational and community facilities, green infrastructure and biodiversity in a sustainable manner⁴.”*

The Council is obliged to achieve the National Planning Framework First Revision's National Policy Objective 12 to *“Ensure the creation of attractive, **liveable**, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being⁵.”*

The National Planning Framework First Revision noted that *“Any new home will have to accommodate changing needs over its lifetime. A **liveable and adaptable** housing development or house is one that is able to respond effectively to these needs without requiring costly and energy intensive alterations⁶.”*

“Liveability” refers to the qualities and characteristics of a place, both a dwelling and a neighbourhood, that support the wellbeing and quality of life of its residents. These features include:

- The quality of the housing build and the local infrastructure
- The available public transport and the neighbourhood's walkability
- The reliability of utilities
- The quality of the environment (air, water, green spaces and food)
- The social cohesion and community spirit
- The stability and opportunities of the local economy and
- The quality of local educational and healthcare facilities.

The recent Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024, the National Planning Framework First Revision 2025 and the Planning Design Standards for Apartments 2025 collectively and primarily seek to ramp up housing construction. In this haste, the “liveability” of new apartments may well suffer.

The Association is concerned particularly about the liveability of apartments on two grounds. As stated earlier, each apartment development now has no apartment mix requirements under Specific Planning Policy Recommendation 1 to fulfil.

³ County Development Plan 2022-28 Chapter 1 Section 1.1 Introduction Page 3.

⁴ County Development Plan 2022-28 Chapter 1 Table 1.4 Strategic County Outcomes Page 17.

⁵ National Planning Framework First Revision 2025 Chapter 4 Making Stronger Urban Places Page 49.

⁶ National Planning Framework First Revision Chapter 6 People, Homes & Community Section 6.6 Housing Page 89.



Additionally, new apartments now need to meet the minimum apartment floor area set by Specific Planning Policy Recommendation 2 of the Planning Design Standards for Apartments Guidelines for Planning Authorities 2025. These nationally-set minima range from 32 square metres (studio apartment) to 90 square metres (3-bedroom apartment).

The Association fears the Council's reliance on private sector housing developers may result in them delivering apartments that merely meet both these floor area minima and other minima as they seek to maximise their profits. That outcome, in time, may well make these apartments "unliveable" after generating significant up-front financial costs and carbon emission costs for their land acquisition, material production and construction.

These 2024-2025 national policy and guideline documents constrain some of the Council's freedom as the County's planning authority. But, they do not relieve the Council from its obligations under the National Planning Framework First Revision to ensure the "liveability" of urban places and achieve the National Policy Objective 12 *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

The Association strongly recommends the Council, both councillors and officials, look abroad (if not already done) for best practices in designing housing developments and their neighbourhoods e.g. Vienna, Amsterdam, Stockholm and Copenhagen. These learnings would guide the Council more firmly as the guardian of the public good in both its pre-planning and planning engagement with developers to ensure the required liveability of the dwellings and their neighbourhoods is attained.

While there is no doubt sustained and increasing pressure on the Council to facilitate ramped-up housing construction, the Council must strive continually to ensure all developments reach a standard that yields the *"liveable and adaptable housing"* the County Development Plan seeks. This "liveability" focus by the Council would lead to better housing and neighbourhoods, guaranteeing the accommodation and its locality would enjoy an extended and useful life.

CLASSIFICATION OF PROXIMITY AND ACCESSIBILITY TO PUBLIC TRANSPORT SERVICES

The residential density of any area is now to be defined by both the County Development Plan and the area's accessibility to public transport.

Table 3.8 Accessibility in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 provided a new set of physical planning terms based on proximity and accessibility to public transport.

These terms, renamed in the County Development Plan Proposed Variation No. 1, and their definitions are:

TERM	DEFINITION
Urban Neighbourhood	Within 1km walking distance of an existing/planned DART/LUAS <u>and</u> within 500m of Core Bus Corridor ⁷ combined with Parking Zones 1 and 2 (<i>NOTE</i>)
Suburban Accessible	Within a 500m walk of High Frequency Bus ⁸ combined with Parking Zone 2 (<i>NOTE</i>)
Suburban Intermediate	Within a 1km walk of High Frequency Bus <u>and</u> a 500m walk to Reasonably Frequent Bus ⁹ combined with Parking Zone 2 (<i>NOTE</i>)

Suburban/Urban Extension Remaining areas within Parking Zone 3 (*NOTE*)

NOTE: Parking Zones 1, 2 and 3 are defined in the County Development Plan 2022-28 Supplementary Map T2. Most of Clonskeagh falls into Parking Zone 3, with only its north-west and south-west corners along the Dundrum being classed a Parking Zone 2. The Core Bus Corridors within the County are the N11 and the Rock Road (Blackrock).

The Association has no views on these physical planning definitions.

⁷ Core Bus Corridors within the County are the Quality Bus Corridors along the N11 and the Rock Road (Blackrock).

⁸ High Frequency Bus arrives every 10 minutes during peak hours.

⁹ Reasonably Frequent Bus arrives every 15 minutes during peak hours.

APPLICATION OF CLASSIFICATION OF PROXIMITY & ACCESSIBILITY TO CLONSKEAGH

But, the Association definitely has a view on the application of these definitions in respect of the Clonskeagh area.

Available Clonskeagh Public Transport

The currently available public transport in the Clonskeagh comprises:

- LUAS Green Line (Broombridge to Bride's Glen/Sandyford via Windy Arbour and Milltown)
- Dublin Bus Route 11 (Sandyford Business District to Phoenix Park via Clonskeagh Road)
- Dublin Bus Route 44 (Enniskerry to DCU via Dundrum Road)
- Go Ahead Route S4 (Liffey Valley to UCD via Dundrum Road)

Dublin Bus Route 142 is ignored as it is an early morning rush-hour service (07:10 to 07:55 departure times) only bringing UCD students and employees from Portmarnock, the City Centre and Rathmines to UCD via Dundrum Road, Bird Avenue and Clonskeagh Road; there is no morning return service. Its early evening rush-hour service (16:35 to 17:35 departure times) similarly only brings UCD students and employees from UCD back to Rathmines, the City Centre and onwards to Portmarnock, again with no evening return service.

LUAS accessibility

For the avoidance of doubt, the bulk of the Clonskeagh area is **not** within a 1 kilometre walk of the LUAS from both the Windy Arbour and Milltown stops. This fact should be accepted by the Council when assessing planning applications for the Clonskeagh area.

The following map shows the limits in Clonskeagh of the 1 kilometre zones from both nearby LUAS stops:



Bus Service Accessibility

The current availability of the public transport bus services in Clonskeagh is:

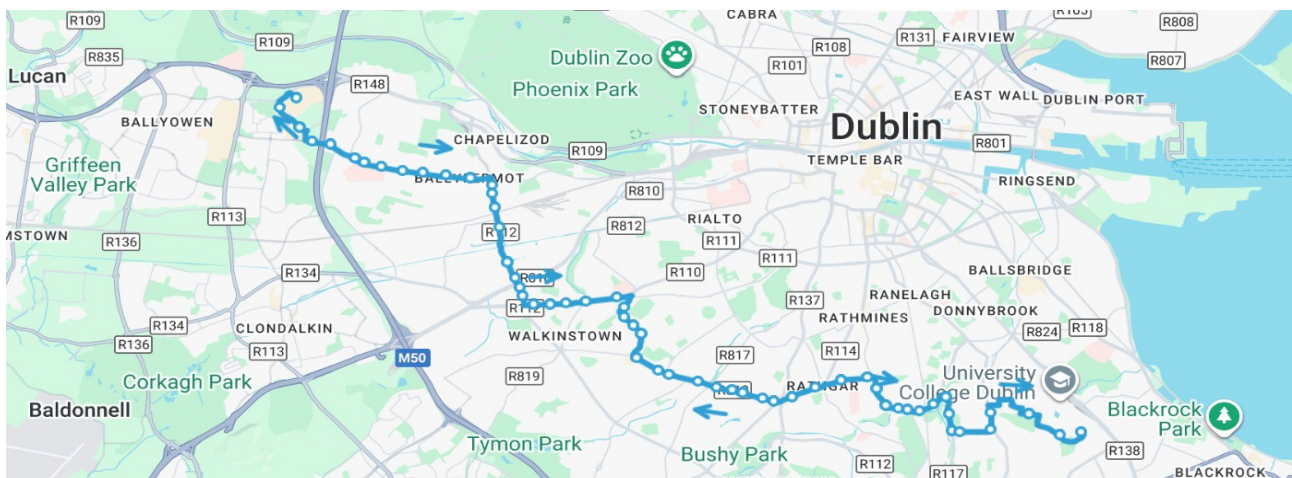
ROUTE NO.	ROUTE	RELEVANT ROADS	MON-FRI PEAK HRS FREQUENCY	MON-FRI SERVICES
11	Sandyford Business District to Phoenix Park	Clonskeagh Road	20 mins	43
44	Enniskerry to DCU	Dundrum Road	30 or 60 mins	18
S4	Liffey Valley to UCD	Dundrum Road, Bird Avenue & Clonskeagh Road	10 mins	107

The National Transport Authority's planned Bus Connects schedules¹⁰ show degraded, planned availability of public transport bus services in Clonskeagh:

ROUTE NO.	ROUTE	RELEVANT ROADS	MON-FRI PEAK HRS FREQUENCY	MON-FRI SERVICES
86	Ticknock to Mountjoy Square	Clonskeagh Road	30 mins	36
87	Belarmine to Mountjoy Square	Dundrum Road	60 mins	17
88	Enniskerry to Mountjoy Square	Dundrum Road	60 mins	18
S4	Liffey Valley to UCD	Dundrum Road, Bird Avenue & Clonskeagh Road	10 mins	107

Go Head S4 bus service

The Go Ahead S4 bus service is a High Frequency Bus in an 18 kilometre chain of 57 bus stops linking very distant Liffey Valley with our near neighbour UCD, through Cherry Orchard, Ballyfermot, Walkinstown, Crumlin, Terenure, Rathgar, Dartry, Milltown and Bird Avenue (see map below).



¹⁰ National Transport Authority's document Dublin Bus Connects_2025-10-01-Route_Frequency.pdf



This S4 bus service offers Clonskeagh residents no service to the City Centre, Ranelagh or Dundrum, their traditional centres for employment, shopping, entertainment and socialising. Given its distance, some 18 kilometres, Clonskeagh residents generally do not see the S4 bus service as suitable for and relevant to their own needs. The S4's main purpose is to feed UCD from its orbital route and the LUAS connection at the nearby Milltown stop.

Classification of Clonskeagh

The Council incorrectly treated Clonskeagh as an “*accessible location*¹¹” (defined as an area “*within 500 metres of existing or planned high frequency (i.e. 10 minute peak hours frequency) urban bus services*”) recently, for example in its approval of the Mount St Mary's Site 1 planning application. The sole basis for this treatment of the area was the availability of the S4 bus service (along the Dundrum Road-Bird Avenue-Clonskeagh Road) which, as explained above, is of very little benefit to and so very little used by Clonskeagh residents for their main life purposes.

Since then, the Proposed Variation No. 1 introduces a new physical planning classification of areas using the Council's terminology of Urban Neighbourhood, Suburban Accessible, Suburban Intermediate and Urban/Suburban Extension.

The foregoing LUAS and public transport bus services analyses have the following impacts:

- The north-west and south-west corners of Clonskeagh along the Dundrum Road being regarded as “Urban Neighbourhoods” due to their proximity to their nearby LUAS stop and their location in a Parking Zone 2 and
- The rest of Clonskeagh being classified as an “Urban/Suburban Extension” as a result of its poor bus service frequencies and its location in Parking Zone 3.

This new classification has differing consequential impacts on the future housing density of these areas within Clonskeagh.

¹¹ Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

TRANSPORT PROVISION

While the County Development Plan 2022-2028 Proposed Variation No. 1 dwells on housing mainly, the Association wishes to comment on the following transport aspects of the County Development Plan:

- Available Bus Services
- LUAS Expansion
- Car Parking
- Through Commuters

These topics have a bearing on the “liveability” of both Clonskeagh and other areas in the County.

Now that the proximity and accessibility to public transport is a strategic determinant of future residential density, it is essential that topics such as these are addressed in both the physical planning and transport planning processes to ensure “liveable” communities are built and thrive.

Available Bus Services

The County Development Plan seeks to achieve a modal shift in the County’s residents’ transport usage by reducing their private car dependency through a combination of measures such as active travelling (walking, cycling and public transport), the 10 minute neighbourhood, etc.

The Association highlighted earlier in this submission the paucity of both the current and planned public transport bus services linking the area with its natural centres of employment, shopping, entertainment and socialising, namely the City Centre, Ranelagh and Dundrum. (This is aggravated by the current near-capacity LUAS Green Line service.) Until there is a material improvement to those bus services to Dundrum, Ranelagh and the City Centre, it is difficult to see Clonskeagh residents making the required modal shift in their transport usage.

LUAS Expansion

The Dublin Metropolitan Area Spatial Plan in a principles-based approach identified Cherrywood, Ballyogan / Carrickmines and Sandyford as strategic employment locations¹² in the County, known as the MetroLink/LUAS Green Line Corridor. These locations are expected to see significant housing and employment growth.

However, the Council *“acknowledged that DLR is part of the wider Greater Dublin Area labour market which is characterised by considerable movement of employees between Counties and that the growth of DLR’s resident population/workforce will only generate a proportional increase in jobs located in the County.”*¹³

A clear implication of this acknowledgement is that there will be increased demand for public transport from residents of other Dublin districts to and from Cherrywood, Ballyogan –

¹² County Development Plan 2022-28 Chapter 2 Core Strategy Page 38

¹³ County Development Plan 2022-28 Chapter 2 Core Strategy Page 40

Carrickmines and Sandyford. This means there will be increased demand for a better LUAS service, more frequent services or longer trams or alternative rapid transport means.

Unfortunately, public transport provision is beyond the Council's domain, residing with both Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA). The TII and NTA may well be distracted by, for example the pending substantial MetroLink development that benefits mainly Fingal County and Dublin City. In that event, both their interest and ability to deliver an improved LUAS Green Line service may be deferred until MetroLink is running in years to come.

Currently, even the current off-peak mid-morning Green Line services to the City Centre are already exceptionally full, with many passengers standing tightly in cramped trams. This lived experience accords with TII's recent LUAS 2050 presentation; it deemed the Green Line capacity was "*OK for the short term*"¹⁴, hinting LUAS capacity difficulties may arise in 2027. That assessment should be a call to action by TII to expand, not extend, the current Green Line service now.

This current near-full capacity LUAS Green Line status will be aggravated by the completion in the interim of already approved new residential developments along or near the route, such as the nearby Dundrum Central (a.k.a. the former Central Mental Hospital with its 934 units for an expected 2,474 residents) and the local Mount St Mary's Site 1 (with its 129 apartments for an expected 186 residents).

The Association strongly recommends the Council continues to engage and work with TII at a senior level to focus on and lobby more actively for delivering an expanded (not extended), current LUAS Green Line service at the earliest opportunity ahead of the completion of both Dundrum Central and the MetroLink developments.

In that regard, the Council, TII and the NTA should share their respective data such as planning applications received, permissions already granted, LUAS passenger volumes along the Green Line, LUAS passenger forecasts, etc. This regular exchange and engagement would better inform both the Council (about the County's ability or inability to have the public transport services needed for its increasing population and the required modal shift the Council seeks) and both TII and the NTA (about the growing priority to expand (not extend) the current LUAS Green Line service, leading to its early delivery).

Car Parking

The Council set the Clonskeagh/Dundrum Specific Local Objective No. 7¹⁵ in the County Development Plan during 2022. The objective is "*To identify and address the on-going car parking issues within and surrounding UCD Campus. In particular, the Council will support, work in conjunction with and facilitate the on-going process of Mobility Management Planning for UCD, involving the University and the NTA, in order to achieve more sustainable travel patterns to and*

¹⁴ <https://www.rte.ie/news/business/2025/0701/1521271-plans-for-new-luas-lines-should-be-accelerated-tii/>

¹⁵ County Development Plan 2022-28 Chapter 14 Specific Local Objectives Page 323

from the University and to work towards the implementation of the UCD Travel Plan 2016 – 2021 – 2026.”

The Association wishes to highlight the deterioration in local parking on Leinster Lawn, Embassy Lawn, Nutgrove Park and Belfield Close over recent years. Comparable deterioration is seen also in nearby Louvain, Ardlea and has been caused by both UCD's use of paid permit car parking and the university's unrelenting growth. The deterioration is causing road blockages, especially for large and wider vehicles, and presents a threat to personal safety and to the mobility of emergency services. The Association expects the Council's engagement with UCD under this Specific Local Objective will result in a sustained improvement in the parking on these Clonskeagh residential roads.

Other local roads in the Clonskeagh area are impacted by a combination of “*overflow parking*” (cars being parked on a road or a green during working hours or overnight not where their owner lives or works) and “*cuckoo parking*” (cars being abandoned for days on end on a road not where their owner lives). Wynnsward Park, Rosemount Crescent, Gledswood Park, Gledswood Avenue, Bird Avenue and Beechmount Drive. Again this behaviour can cause road blockages, posing a threat to personal safety and the mobility of emergency services. Clonskeagh is not unique with this experience but it does behove the Council to strive with the TII and NTA to deliver improved public transport services and better designed and located parking spaces in the area.

Through Commuters

As noted earlier, the Council acknowledges that many workers in the strategic employment locations of Sandyford Business District, Ballyogan – Carrickmines and Cherrywood do and will reside outside the County. Many may have to commute through both the Clonskeagh Road and Dundrum Road by car, particularly if the LUAS Green Line is not expanded and the planned Bus Connect-degrading of the area's public transport bus services is implemented.

The matter of workers living distant from their employment location however is not confined to those strategic employment locations in the County. Employees and students based in Ballsbridge, Donnybrook, UCD, Dundrum, Nutgrove and other employment areas traverse the Clonskeagh area daily from their residences elsewhere. These commuters use the Dundrum Road, Bird Avenue, Clonskeagh Road (as well as adjoining “rat run” roads) in the area, both in the morning and evening rush hours.

With employment in the County forecasted to grow in the County Development Plan, the Association is concerned about the increasing environmental and safety risks posed by this anticipated growth in the neighbourhood's through road traffic. The Association wishes to engage with the Council to improve the through public transport provision, the permeability of road traffic, the environment and public safety in the area.



LOCAL AREA PLAN

The Association notes the Council has the Specific Local Objective No. 127 to produce a local area plan for Clonskeagh/UCD during the term of the current County Development Plan¹⁶.

The Association also notes that the 2023 Dundrum Area Based Transport Assessment from the consultants Systra will likely be one input to the production of this Clonskeagh/UCD Local Area Plan.

The Association wishes to engage with the Council very shortly to assist it in the developing and finalising this Clonskeagh/UCD Local Area Plan with the aim of making Clonskeagh a better neighbourhood for its residents. This Proposed Variation No. 1 submission gives the Council an insight into the Association's thinking.

¹⁶ County Development Plan 2022-28 Chapter 14 Specific Local Objectives Page 324

CONCLUSIONS

The Association has set out its concerns about elements of the Proposed Variation No. 1 of the County Development Plan 2022-28 in this submission.

While the Council's freedom as a planning authority is constrained, the Council must act in the public good to ensure all new residential developments are ***liveable and adaptable*** as the County Development Plan seeks. That requires the Council, both councillors and officials, to be informed on the required standards of liveability and adaptability and to secure their application in new developments.

The Association has demonstrated how the new physical planning definitions (Urban Neighbourhood, Suburban Accessible, Suburban Intermediate and Suburban/Urban Extension) will apply to the Clonskeagh area and expects the Council to accept this finding.

Finally, the Association has highlighted several local issues that affect the liveability of this neighbourhood as well as the Council's hopes for a modal shift in the transport behaviour of residents in the County. These issues include the poor local public transport bus services, the need for an expansion (not an extension) of the LUAS Green Line, local parking difficulties arising from UCD's proximity and the Association's desire to contribute to the formulation of the Clonskeagh-UCD Local Area Plan, one of the County Development Plan's local objectives.

The Association hopes the Council will set about delivering the County Development Plan 2022-2028 Proposed Variation No. 1 with an emphasis on the liveability of new housing developments in the public good and will work with the Association to improve the liveability of the Clonskeagh area.