

Variation No. 1 to South Dublin County Development Plan 2022- 2028: Clondalkin Local Planning Framework

Chief Executive's Report on
Submissions/Observations
Received on the Material
Alterations to Proposed
Variation 1 to the County
Development Plan 2022-2028

13th February 2026



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1.0 Introduction

1.1 Preamble

This report relates to submissions and observations received from members of the public, key stakeholders and prescribed authorities / public bodies following the publication of the Proposed Material Alterations to Variation No. 1 to the South Dublin County Development Plan 2022-2028 - the Clondalkin Local Planning Framework.

The Proposed Variation together with the environmental assessments, was initially placed on public display from Tuesday 26th August 2025 until Monday 29th September 2025. A total of 235 submissions were received and a Chief Executive's Report on submissions and observations was prepared and submitted to the Elected Members of South Dublin County Council for their consideration on the 5th of November 2025.

At a Special Council meeting on the 11th of December 2025, the Elected Members of South Dublin County Council considered the Variation and the Chief Executive's Report on submissions/observations received. At the meeting it was resolved by the Elected Members to make the Variation with alterations, and as a number of these alterations constituted a material alteration to the Variation, the proposed material alterations were subject to further public consultation.

In accordance with Section 13(6)(ac) of the Planning and Development Act 2000 (as amended), the proposed material alterations were published for public consultation from Thursday 18th December 2025 to Monday 26th January 2026 inclusive.

1.2 Environmental Assessments

In accordance with Section 13(6)(aa) of the Planning and Development Act 2000 (as amended), South Dublin County Council screened the alterations and determined that a Strategic Environmental Assessment (SEA) was not required with respect to any of the alterations including the proposed material alterations. AA screening was also undertaken and it was determined that a stage 2 Appropriate Assessment (AA) was not required for any of the proposed alterations.

In this regard, the following documents were published for inspection and public consultation:

1. Strategic Environmental Assessment (SEA) Screening Report of Material Alterations
2. SEA Screening Determination
3. Appropriate Assessment (AA) Screening Report of Material Alterations
4. AA Screening Determination

1.3 Public Consultation

Written submissions or observations on the proposed material alterations to the Variation, the SEA and AA determinations in accordance with Section 13(6) of the Planning and Development Act 2000, as amended, and the associated SEA and AA screening reports were invited from members of the public and other interested parties.

A copy of the proposed material alterations was available for inspection (excluding Bank Holidays) from Thursday 18th December 2025 to Monday 26th January 2026 inclusive during normal opening hours at the following locations:

- County Library, Parthalán Place, Tallaght, D24 TNP8
- County Hall, Tallaght, D24 A3XC
- Clondalkin Library, Monastery Road, Clondalkin, D22 XPO3

All documentation could also be viewed on, or downloaded from, the council's website at: <https://www.sdcc.ie/en/devplan2022/>

A public information drop-in day was held in respect of the proposed material alterations to Variation No. 1 to the County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework at Clondalkin Civic Offices on Wednesday 14th January between 4pm and 6pm.

1.4 Statutory Bodies

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

1.5 Submissions Received

There were 12 submissions received during the public consultation period on the proposed material alterations to the Variation. Written submissions and observations were published on the website of the authority, <https://consult.sdublincoco.ie/en/consultation/proposed-material-alterations-variation-no-1-county-development-plan-draft-clondalkin-local-planning>.

In this Chief Executive's Report submissions have been summarised under the relevant material alteration with the Chief Executive's response and recommendation to the issues raised. Access to each submission in full is available through the relevant hyperlinks in this report within each summary section and through the list of submissions also included in the report.

1.6 List of Submissions

Submission	Author	Type
SD-C396-1	Tara Horigan on behalf of the Health and Safety Authority (HSA)	Individual / Organisation
SD-C396-2	James O'Brien	Individual
SD-C396-3	Jessica Keogh	Individual
SD-C396-4	Bea B	Individual
SD-C396-5	National Transport Authority (NTA)	Organisation
SD-C396-6	Office of Public Works (OPW)	Organisation
SD-C396-7	Department of Education and Youth (DoEY)	Organisation
SD-C396-8	Environmental Protection Agency (EPA)	Organisation
SD-C396-9	Office of the Planning Regulator (OPR)	Organisation
SD-C396-10	Irish Water	Organisation
SD-C396-11	Transport Infrastructure Ireland (TII)	Organisation
SD-C396-12	Thornton O'Connor Town Planning	Organisation

Table 1.1: List of submissions.

Table 1.2 below indicates the number of observations (issues or separate items) raised in submissions broken down by Material Alteration. Some submissions raise more than one observation. For example, the OPW ([SD-C396-6](#)), has made one submission, but made separate observations on two different Material Alterations (SFRA 1 and SFRA 2) within that one submission.

Number of Observations Raised by Material Alteration			
	Category	Observations Raised	% of Total
1	Proposed Material Alteration No. 4	2	8
2	Proposed Material Alteration No. 7	1	4
3	Proposed Material Alteration No. 8	2	8
4	Proposed Material Alteration No. 9	1	4
5	Proposed Material Alteration No. 10	1	4

6	Proposed Material Alteration No. 20	2	8
7	Proposed Material Alteration No. 25	3	12
8	Proposed Material Alteration No. SFRA 1	2	8
9	Proposed Material Alteration No. SFRA 2	2	8
10	Proposed Material Alteration No. SEA 1	1	4
11	Outside of the Scope of Proposed Material Alterations	8	32
		25	100

Table 1.2: Breakdown of observations by Material Alteration.

1.7 Next Steps

This CE Report, issued on the 13th February 2026, will be considered with the proposed Material Alterations as a Headed Item at the full Council meeting on March 9th. At that meeting Members will be required to make a resolution to make the Variation with the Material Alterations or to adopt it with minor modifications to the Material Alterations.

The final text of the variation will include the non-material amendments which were agreed at the Special Meeting of the Council on 11th December. All amendments were reviewed following that meeting and only those that were material in nature were published for public consultation, as provided for in the Planning and Development Acts.

The Variation will have immediate effect.

2.0 Summaries, Chief Executive’s Responses and Recommendations to Issues Raised in Submissions on the Material Alterations

The Chief Executive’s (CE) response and recommendation is set out below for submissions which raised issues on the Material Alterations.

In instances where no submission was received relating to a Material Alteration, the reference number of that Material Alteration is given alongside the response and recommendation of the CE. The wording of each Material Amendment where no submission was received is provided in Appendix 1.

In some instances, submissions were received which did not relate to a Material Alteration. These are set out in Section 3 of this report.

Chapter 2: Vision and Strategic Objectives

Proposed Material Alteration No. 1
No submission has been received in response to MA 1. It is considered that this MA positively strengthens the strategic objectives.
CE Recommendation It is recommended that the Proposed Material Alteration MA1 to Variation No. 1 be adopted.

Chapter 4: Green Infrastructure

Proposed Material Alteration No. 2
No submission has been received in response to MA 2. It is considered that the proposed wording positively strengthens the objective.
CE Recommendation It is recommended that the Proposed Material Alteration MA2 to Variation No. 1 be adopted.

Proposed Material Alteration No. 3
No submission has been received in response to MA 3. It is considered that the proposed wording positively strengthens the objective.
CE Recommendation It is recommended that the Proposed Material Alteration MA3 to Variation No. 1 be adopted.

Chapter 5: Sustainable Movement

Material Alteration Number: MA 4	
Section 5.6, Page 43	
<p><i>Insert a new Objective under SM1: Active Travel - Overarching as follows:</i></p> <p>‘SM1 Objective 6: To ensure that new development areas apply the principle of filtered permeability, providing for pedestrian and cyclist movement, discouraging through traffic by private car.’</p>	
Submission No.	Submission Summary and CE Response
SD-C396-5 National Transport Authority	<p>Submission Summary: The NTA are supportive of MA4.</p> <p>CE Response: The NTA support is welcomed.</p>
SD-C396-9 Office of the Planning Regulator	<p>Submission Summary: The Office welcomes the inclusion of MA4.</p> <p>CE Response: The submission is noted and welcomed.</p>
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration MA4 to Variation No. 1 be adopted.</p>	

Proposed Material Alteration No. 5
<p>No submission has been received in response to MA 5.</p> <p>It is considered that the proposed wording positively strengthens the objective.</p>
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA5 to Variation No. 1 be adopted.</p>

Proposed Material Alteration No. 6
<p>No submission has been received in response to MA 6.</p> <p>It is considered that this MA increases clarity.</p>
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA6 to Variation No. 1 be adopted.</p>

Material Alteration Number: MA 7

Section 5.6, Page 47

Insert a new Objective under SM5: Priority, Secondary and Strategic Permeability Routes (and amend numbering as needed) as follows:

‘To support the potential for strategic permeability routes within the existing village area only where the opportunity arises as part of proposed redevelopment and / or the consent of the relevant landowners and subject to any proposals undertaking the appropriate environmental and archaeological assessments.’

Submission No.

Submission Summary and CE Response

[SD-C396-9 Office of the Planning Regulator](#)

Submission Summary:

The Office welcomes the inclusion of MA7.

CE Response:

The submission is noted and welcomed.

CE Recommendation:

It is recommended that the Proposed Material Alteration MA7 to Variation No. 1 be adopted.

Material Alteration Number: MA 8

Section 5.6, Page 47

Insert an additional objective under SM5: Priority, Secondary and Strategic Permeability Routes (and amend numbering as needed) as follows:

‘To hold public consultation and seek agreement with those directly impacted on any future proposed permeability links or estate opening.’

Submission No.

Submission Summary and CE Response

[SD-C396-5 National Transport Authority](#)

Submission Summary:

The NTA refers to proposed MA8 which provides for an additional objective under SM5: Priority, Secondary and Strategic Permeability Routes as follows:

‘To hold public consultation and seek agreement with those directly impacted on any future proposed permeability links or estate opening.’

Though the NTA fully supports further consultation during scheme or project development, it is considered that it is not always

	<p>possible to reach agreement with all those directly impacted. Furthermore, it is important that the wider impacts of permeability schemes benefits for the wider area and the potential contribution to the overall pedestrian network are also considered in decision making.</p> <p>As such, it is recommended that the commitment to ‘<i>seek agreement with those directly impacted</i>’ should be removed.</p> <p>CE Response: The content of the submission is noted. It is acknowledged that it is not always possible to reach agreement with all those directly impacted by permeability routes, it is desirable however, to seek agreement in as far as is possible and within reason with those who are likely to be impacted. It is considered that the wording in the MA is appropriate.</p>
<p>SD-C396-9 Office of the Planning Regulator</p>	<p>Submission Summary: The Office welcomes the inclusion of MA8.</p> <p>CE Response: The Council welcomes the submission.</p>
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration MA8 to Variation No. 1 is adopted.</p>	

<p>Material Alteration Number: MA 9</p>	
<p>Section 5.6, Page 50, Figure 5.11</p>	
<p><i>Amend title of Figure 5.11 to:</i> ‘Existing and proposed safe routes to School locations and proposed potential junction improvements’ <i>And</i> <i>Remove the junction numbers from Figure 5.11.</i></p>	
<p>Submission No.</p>	<p>Submission Summary and CE Response</p>

SD-C396-4

Bea B

Submission Summary:

This submission objects to the downgrading of language in the Clondalkin LPF, particularly the use of vague terms such as “potential” in relation to Safe Routes to School, which weakens intent, accountability and delivery. The following points are made within their cover letter and observation:

- They believe Safe Routes to School not to be aspirational, stating under European best practice, '*school-front safety is a minimum standard*'.
- The state that 'Clondalkin does not need endless consultation cycles', with the problems being well known and well evidenced, and the wider community requiring implementation of proven measures.
- Streets are dominated by private vehicles, with this environment failing children, frontline workers and residents who rely on safe walking, cycling and public transport to get to school and work every day. They go on to state that planning decisions must serve the whole community, not a small, car-dependent minority, with safe access to school and work a requirement now and should not depend on car ownership.
- The submission also notes it is alarming that such weakening of language is occurring in respect of locations immediately at the front of schools, as these are locations where children cross the road daily.
- They note that Clondalkin is a diverse community with many residents not relying on private cars and are well accustomed to walking, cycling, and public transport when safe infrastructure exists. They state that '*street design and planning priorities continue to centre car storage and car movement*', which forces car dependency on the local population.
- They state that public consultation is often attended by car dependant population, effectively excluding public transport users from shaping decisions.

The proposed submission seeks a commitment to Safe Routes to Schools using “Proposed” wording and commitment to implement those changes that benefit the most diverse, poor and non-car dependent population of Clondalkin, and to move from consultation to delivery of the LPF.

They finally note in their cover letter that there may be legal liability to the Council where risks have been identified and effective mitigation not carried out.

CE Response:

The use of the term 'potential' is used with reference to junction improvements only, see wording of the amendment above. There is no change proposed to the wording of the title of Figure 5.11 as it relates to Safe Routes to School.

It is only junction improvements where the proposed change to 'potential' instead of 'proposed' is made in the MA as further assessments of these junctions are required prior to the implementation of any works. See SM9 Objective 1 which states (following the December Council Meeting):

'To assess the need for junction improvements, upgrading where necessary, to improve road safety for all users, giving priority to those most vulnerable, while providing for traffic flow in and out of the village centre having due regard to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012.'

The Council is fully committed to the 'Safe Routes to Schools' programme with the approach of the LPF clearly set out in the dedicated section on 'Safe Routes to Schools' set out on page 50 of the document. The following objectives of the LPF are also noted.

SM6 Objective 1

'To support the development of 'Safe Routes to Schools' throughout the LPF area, supporting measures that prioritise the safety of school children and the creation of safer school routes through the implementation of appropriate infrastructure measures'.

SM6 Objective 2

'To engage with the road safety officer to create school focused transport campaigns regarding mindset changes around travel to and from school, creating a 'movement' from private motor vehicles to more sustainable methods of transport.'

CE Recommendation:

It is recommended that the Proposed Material Alteration MA9 to Variation No. 1 be adopted.

Chapter 6: Community, Homes and Employment

Material Alteration Number: MA 10	
Section 6.2, Page 56	
<p><i>Insert a new Objective under CHE2: Education Facilities as follows:</i></p> <p>‘CHE2 Objective 4: To continue to engage with the Department of Education and Youth to support the provision of school accommodation for children and young people with special educational needs within Clondalkin as required to meet identified needs.’</p>	
Submission No.	Submission Summary and CE Response
SD-C396-7 Department of Education and Youth	<p>Submission Summary: The Department of Education and Youth welcomes MA10, highlighting the importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs.</p> <p>CE Response: The content of the submission is noted and welcomed.</p>
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration MA10 to Variation No. 1 be adopted.</p>	

Proposed Material Alteration No. 11
<p>No submission has been received in response to MA 11.</p> <p>It is considered that the proposed wording positively strengthens the objective.</p>
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA11 to Variation No. 1 be adopted.</p>

Proposed Material Alteration No. 12
<p>No submission has been received in response to MA 12.</p> <p>It is considered that this MA supports the delivery of youth facilities.</p>
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA12 to Variation No. 1 be adopted.</p>

Proposed Material Alteration No. 13

No submission has been received in response to MA 13.
It is considered that this MA supports social inclusion.

CE Recommendation

It is recommended that the Proposed Material Alteration MA13 to Variation No. 1 be adopted.

Proposed Material Alteration No. 14

No submission has been received in response to MA 14.
It is considered that the proposed wording positively strengthens the objective.

CE Recommendation

It is recommended that the Proposed Material Alteration MA14 to Variation No. 1 be adopted.

Proposed Material Alteration No. 15

No submission has been received in response to MA 15.
It is considered that this MA promotes the use of vacant/obsolete floorspace for startup enterprises or cultural uses.

CE Recommendation

It is recommended that the Proposed Material Alteration MA15 to Variation No. 1 be adopted.

Proposed Material Alteration No. 16

No submission has been received in response to MA 16.
It is considered that this MA supports Clondalkin as a Fairtrade Town.

CE Recommendation

It is recommended that the Proposed Material Alteration MA16 to Variation No. 1 be adopted.

Chapter 7: Conservation and Built Heritage**Proposed Material Alteration No. 17**

No submission has been received in response to MA 17.
It is considered that the proposed wording positively strengthens the objective.

CE Recommendation

It is recommended that the Proposed Material Alteration MA17 to Variation No. 1 be adopted.

Chapter 8: Urban Design Strategy

Proposed Material Alteration No. 18
<p>No submission has been received in response to MA 18. It is considered that this MA increases clarity.</p>
<p>CE Recommendation It is recommended that the Proposed Material Alteration MA18 to Variation No. 1 be adopted.</p>

Proposed Material Alteration No. 19
<p>No submission has been received in response to MA 19. It is considered that this MA illustrates more clearly that Old Nangor Road is two way.</p>
<p>CE Recommendation It is recommended that the Proposed Material Alteration MA19 to Variation No. 1 be adopted.</p>

Material Alteration Number: MA 20	
Section 8.5.2, Page 93/94	
<p><i>To include a new mini framework in Chapter 8, section 8.5.2 Mini Framework Sites titled 'Tower Road / Main Street Junction' with the wording and images as set out in the attached pdf document named 'MINI FRAMEWORK FOR TOWER ROAD/MAIN STREET JUNCTION'</i></p> <p>See Appendix 2 for detail of the alteration.</p>	
Submission No.	Submission Summary and CE Response
<p>SD-C396-5 National Transport Authority</p>	<p>Submission Summary: The NTA are supportive of the inclusion of the Tower Road / Main Street Junction mini framework, noting the potential for future permeability routes in this area.</p> <p>CE Response: The content of the submission is noted and welcomed.</p>
<p>SD-C396-9 Office of the Planning Regulator</p>	<p>Submission Summary: The Office is satisfied that the inclusion of MA 20, which includes a new Mini Framework for Tower Road / Main Street Junction, is consistent with the overarching Urban Design Strategy for Clondalkin set out in Chapter 8 of the proposed Variation.</p> <p>CE Response:</p>

	The submission is noted and welcomed.
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration MA20 to Variation No. 1 be adopted.</p>	

<p>Proposed Material Alteration No. 21</p>	
<p>No submission has been received in response to MA 21.</p> <p>It is considered that this MA strengthens the parameters within the Water Tower Opportunity Site by identifying the watermain.</p>	
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA21 to Variation No. 1 be adopted.</p>	

<p>Proposed Material Alteration No. 22</p>	
<p>No submission has been received in response to MA 22.</p> <p>It is considered that this MA strengthens the parameters within the Dutch Village Opportunity Site by ensuring the protection of the existing monument on the site.</p>	
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA22 to Variation No. 1 be adopted.</p>	

<p>Proposed Material Alteration No. 23</p>	
<p>No submission has been received in response to MA 23.</p> <p>It is considered that this MA accommodates the need for civic engagement.</p>	
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA23 to Variation No. 1 be adopted.</p>	

<p>Proposed Material Alteration No. 24</p>	
<p>No submission has been received in response to MA 24.</p> <p>It is considered that this MA increases clarity.</p>	
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA24 to Variation No. 1 be adopted.</p>	

Material Alteration Number: MA 25

Section 8.7, Page 104, Figure 8.32

Amend Figure 8.32 as follows:

- *'On page 104 of the Draft LPF, remove reference to 'vehicle movement' and to illustrate more clearly the long term high capacity public transport route, as identified in the adopted County Development Plan; and*
- *Include the identification of the permeability links in the Figure 8.32 Key, identified as 'n' and 'o' between the Ninth Lock Framework site and the Mill Centre site, as shown on the revised map below.*

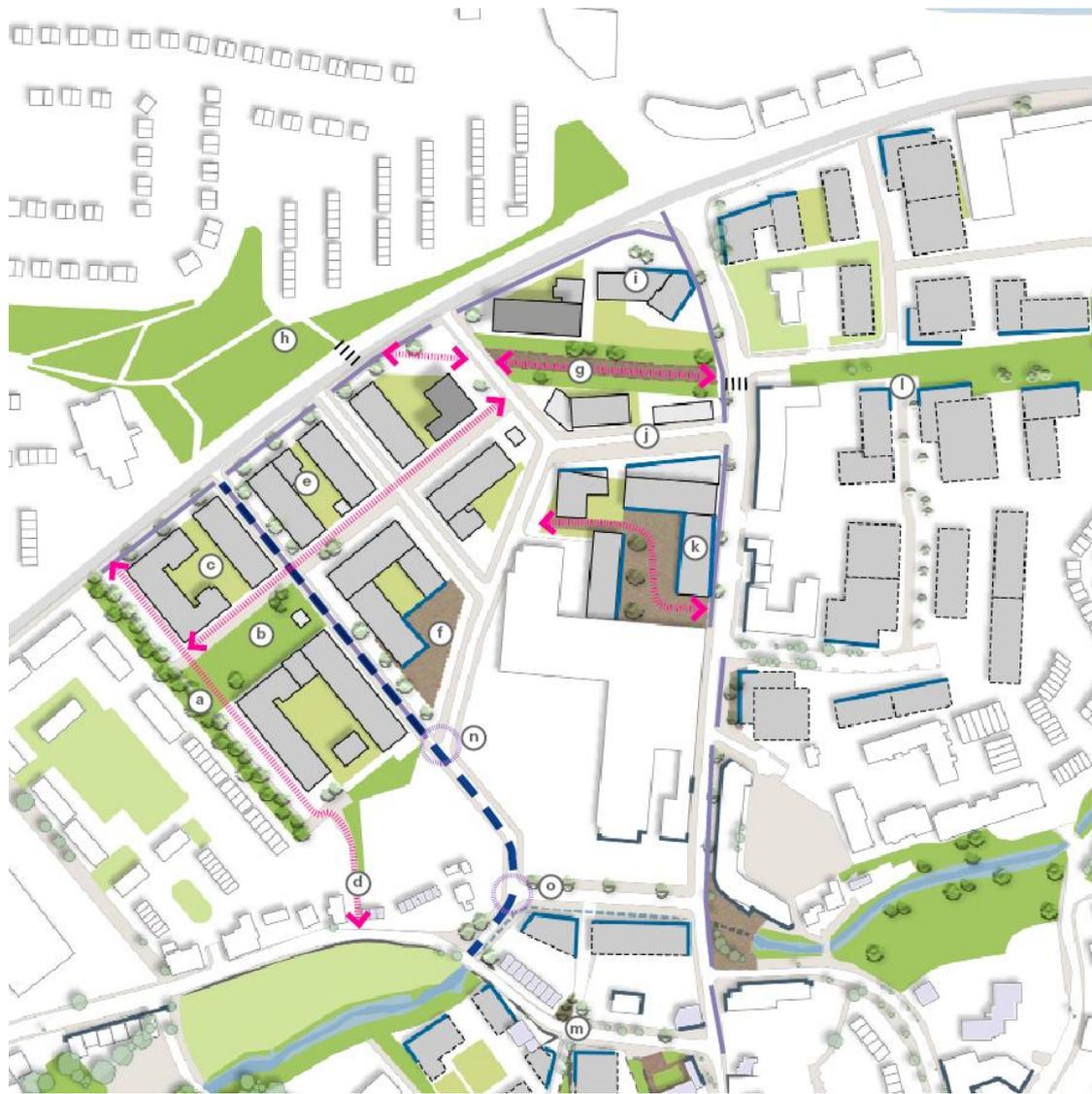
Current Draft LPF Figure 8.32 (Extract)



Current Draft LPF Figure 8.32 Legend/Key (Extract)



Proposed Change to Draft LPF Figure 8.32 (Extract)



Proposed Change to Draft LPF Figure 8.32 Legend/Key (Extract)

-  Active Movement
-  Active travel route
-  High Capacity Public Transport Reserve
-  Future Permeability
-  Active Frontage

And add the following text in key for letter 'n':

Future permeability link between the Ninth Lock Framework site and the Mill Centre site.

And add the following text in key for letter 'o':

Future permeability link between the Ninth Lock Framework site and the Mill Centre site.

Submission No.	Submission Summary and CE Response
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<p><u>SD-C396-2</u> <u>James O'Brien</u></p>	<p>Submission Summary: The submission acknowledges the need for residential development; however, the submitter highlights a number of issues that relate to the movement strategy for the Ninth Lock Road Framework Site including:</p> <ul style="list-style-type: none"> - Vehicular permeability through the Mill Shopping Centre car park and/or the funnelling onto Old Nangor Road is unsustainable with the road already being at capacity. - Traffic displacement will impact Millpark Estate which was not designed for large traffic volumes and will lead to 'rat-running' in the area. - Lead to permanent gridlock in the village core. <p>The submission proposes that primary vehicular access should be via the New Nangor Road as this will protect the safety and character of existing residential communities.</p> <p>The submission requests that the council should amend the movement for the Ninth Lock Road Framework Site.</p> <p>CE Response: The content of the submission is acknowledged. However, this amendment (see above) removes the reference to vehicular movement from the Framework Site to the Old Nangor Road and clarifies that it is a permeability route with the longer term potential for a high capacity public transport route.</p>
<p><u>SD-C396-5</u> <u>National Transport Authority</u></p>	<p>Submission Summary: The NTA are supportive of MA25 which amends Figure 8.32 to remove reference to vehicle movement and illustrate clearly the long term high capacity public transport route as identified in the CDP. MA25 also includes the identification of permeability links between the Ninth Lock Framework Site and the Mill Centre site.</p> <p>CE Response: The content of the submission is noted and welcomed.</p>
<p><u>SD-C396-12</u> <u>Thornton O'Connor Town Planning</u></p>	<p>Submission Summary: The proposed submission has been submitted by Thornton O'Connor Town Planning on behalf of ARP 4.3 Sustainable Communities (Ireland) Fund, in relation to lands located at the Ninth Lock Framework Site and Material Alteration 25.</p> <p>A large extent of the lands within the Ninth Lock Framework Site are owned by the submitter's client.</p> <p>The submission states that it is noted that the movement parameters for the site (page 101 of the Draft Clondalkin LPF) have not been updated to reflect the changes listed under</p>

MA25. To ensure clear and appropriate vehicular movements to the Ninth Lock Framework Site is provided for as part of any future development, it is requested that the following minor changes to the text provided on page 101 of the Draft Clondalkin LPF are made:

From:

“Encourage servicing to the Mill Shopping Centre to be carried out by way of access through a new road network within the Framework site, to help reduce commercial traffic movement within the village centre.”

To:

"Encourage vehicular access to the Ninth Lock Framework Site and the adjacent Mill Centre to be carried out in a manner that ensures that the new road network within the Ninth Lock Framework Site makes appropriate provision for future access to the Mill Centre from the Ninth Lock Road up to the extent of boundary controlled by each site owner, so as to ensure the efficient movement of traffic within the village centre over time.”

This ensures the movement and access strategy will allow the Ninth Lock Framework Site to come forward for development in a manner that does not prejudice the future development of adjacent lands and the wider movement strategies.

The submission also notes the Ninth Lock Framework Site is subject to a number of design parameters which were altered under MA25, including permeability routes, active movement routes, vehicular connections, etc. As there is no certainty at this stage that adjacent landowners will agree to the inclusion of their land as part of any future development on the submitters land, their ability to deliver a scheme that precisely adheres to the Clondalkin LPF is restricted. The submission requests that the following language be included within the Ninth Lock Framework site section of the plan as follows:

The map and key are indicative only and intended to illustrate the broad development principles for the area. The precise layout, alignment and delivery of routes, connections and infrastructure may be subject to change at planning application stage, having regard to land ownership, technical constraints and detailed design, provided the overall objectives of the Framework Site are met.

The submission notes that in Objective SM5 under MA7, similar language has been introduced.

	<p>CE Response:</p> <p>In respect of the parameters referred to, it is noted that the wording of the parameters in the LPF facilitates options for the future servicing of the Mill Shopping Centre from the New Nangor Road through the Ninth Lock Framework Site thereby reducing the need for commercial traffic to access the service area exclusively from the Ninth Lock Road. It is not considered that the parameter as currently worded would prejudice the future development of any lands or wider movement strategies. It would be premature at this point to specify how that traffic would access the wider network through the Framework Site.</p> <p>In relation to the issue around proposed amended wording it is noted that the preparation of Framework Plans for large scale potential development sites within the LPF area is one of the key requirements arising from the decision of the Council to prepare a statutory plan for the Clondalkin Area. The purpose is clearly set out in the document with parameters and direction provided in relation to any potential future development of these lands. It is considered that the parameters and guidance set out in the Variation (LPF) are appropriate in terms of the need for the LPF to provide general direction on the Urban Design approach which should be taken in respect of the future development of this site.</p>
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration MA25 to Variation No. 1 be adopted without modification.</p>	

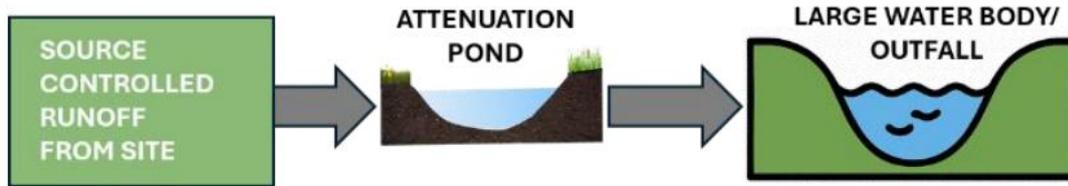
<p>Proposed Material Alteration No. 26</p>	
<p>No submission has been received in response to MA 26. It is considered that this MA increases clarity.</p>	
<p>CE Recommendation</p> <p>It is recommended that the Proposed Material Alteration MA26 to Variation No. 1 be adopted.</p>	

Strategic Flood Risk Assessment

Material Alteration Number: SFRA 1	
Section 8.2	
<p><i>Amend the text in section 8.2 of the SFRA to:</i></p> <p>The Justification Test is required for all opportunity sites and areas for potential development within a flood zone, whether located behind defences or not.</p> <p>Climate change impacts have been assessed due to the use of HEFS extents within the baseline Flood Zone A & B extents throughout this SFRA. Clondalkin is not at risk of coastal flooding. Figure 8-2 below shows risk to opportunity sites in Clondalkin. Justification tests follow in Appendix A.</p> <p>Due to the current absence of the Camac FRS flood extents and the related uncertainty in flood extents within the Clondalkin area, it is necessary to proceed to assess the opportunity sites based on the HEFS flood extents. The HEFS extents provide valuable information to inform zoning decisions, particularly where development is proposed in areas that may be vulnerable under more extreme climate scenarios. Therefore, the HEFS flood extents have been used as part of the Justification Test appraisal of the opportunity sites undertaken in Appendix A. This approach aligns with the National Planning Framework (NPF), which identifies flood risk management and climate adaptation as key components of sustainable spatial planning. The NPF Strategic Flood Risk Assessment emphasises that flood risk should be a core consideration in land use planning, that the sequential approach should guide zoning decisions and that climate resilience must be embedded in all planmaking processes. The baseline Flood Zone A & B extents and the opportunity sites are provided in Figure 8-2. Figure 8-3 provides the HEFS flood extents with the opportunity sites that have been used as part of the Justification Test undertaken in Appendix A.</p>	
Submission No.	Submission Summary and CE Response
<u>SD-C396-6 Office of Public Works</u>	<p>Submission Summary:</p> <p>The OPW stated that clarification for providing justification tests for the opportunity sites which are not at risk of flooding currently but could be in the future is welcomed. The OPW do state that previously comments at Draft LPF stage were not addressed in the proposed material alterations regarding no plan-making justification tests for existing zonings that are at risk of flooding such as TC, VC and RES.</p> <p>CE Response:</p> <p>The OPW’s welcoming of the approach to the justification tests is noted. In relation to the further comments regarding justifications for existing zonings, it is noted that this issue was addressed as part of the SFRA carried out for the South Dublin County Development Plan 2022-2028 and that no changes to zoning</p>

	were included within this variation.
<u>SD-C396-9 Office of the Planning Regulator</u>	<p>Submission Summary: The OPR welcomes the additions and clarification relating to the Plan Making Justification Test.</p> <p>CE Response: The Council welcomes the submission.</p>
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration SFRA1 to Variation No. 1 be adopted.</p>	

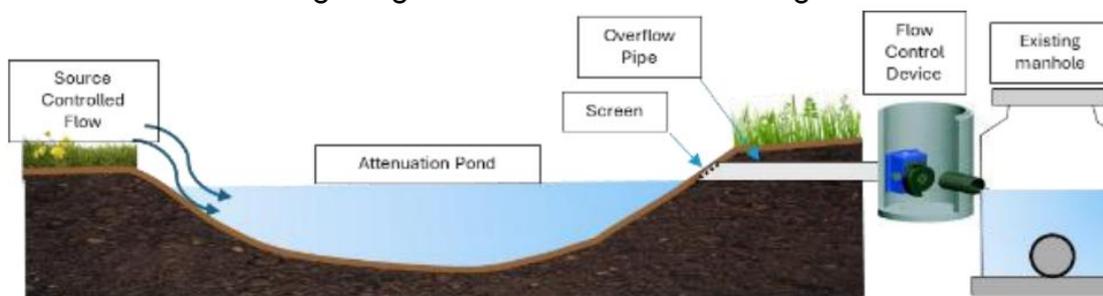
Material Alteration Number: SFRA 2	
Appendices A – Section A.1	
<p><i>To amend the draft SFRA to include present day flood risk mapping as a distinct layer within the document; and To amend the SFRA, to include a new section on stormwater management within the Justification Test for each opportunity site in Appendix A (Appendix A.1.1, A.1.2, A.1.3 and A.1.4), indicating the appropriate measures for stormwater management (SuDS) for each site, identifying as appropriate where integrated and area-based provision of SuDS and green infrastructure can be incorporated in order to avoid reliance on individual site by site solutions as follows:</i></p> <p>Add ‘Stormwater Management’ section in A1.1: ‘The site is predominantly greenfield and relatively large, providing excellent scope to implement an integrated and sustainable stormwater management strategy. Given its size, the area lends itself well to a masterplan-based SuDS design, where runoff from different development parcels can be managed collectively rather than through separate, site-bysite systems. A stormwater attenuation basin could be strategically located along the southern boundary near River Camac if the topography allows. This basin would serve as the main control feature, temporarily storing surface water before releasing it at a restricted rate— kept to the greenfield runoff equivalent or a practical minimum of 2 L/s in accordance with CIRIA guidance. A typical schematic for such site is illustrated below: Additionally, source control SuDS measures such as swales, rain gardens, and permeable paving should be incorporated within individual plots to slow, treat, and retain runoff close to where it falls. These measures will contribute to the overall network, reducing reliance on hard-engineered solutions and enhancing biodiversity and amenity. Exact location of attenuation site will depend on topographical and hydraulic assessment during later design stages.’</p> <p>And add the following image in the ‘Stormwater Management’ section in A1.1:</p>	



Add 'Stormwater Management' section in A1.2:

'Site 2 primarily comprises existing commercial and warehouse developments that are already connected to a stormwater drainage network. In the event of redevelopment or future expansion, it is recommended to incorporate blue/green SuDS measures to improve runoff management, water quality, and site resilience. Suitable measures may include green roofs, tree-pit infiltration, and permeable paving to promote local infiltration and reduce surface runoff. Where sufficient space exists, swales or landscaped attenuation features can be added to enhance on-site storage and reduce peak flows. As a final measure, to minimise pressure on the public drainage network, underground storage tanks may be installed to control discharge at a rate equivalent to the greenfield runoff or 2 L/s, whichever is greater, thereby mitigating the risk of downstream flooding. Site 3 is predominantly greenfield, providing significant flexibility for the implementation of an integrated SuDS strategy within a coordinated masterplan framework. The site's undeveloped nature allows for a holistic green approach that manages surface water runoff at source, promotes infiltration, and enhances amenity and biodiversity. A stormwater attenuation basin can be strategically located within the site, aligned with the natural topography to collect and temporarily store runoff from surrounding development parcels. The stored water can then be discharged in a controlled manner to the external stormwater network, as illustrated in the schematic below. This controlled release, managed through a flow control chamber ensures that discharge rates do not exceed the greenfield runoff equivalent, or a minimum of 2 L/s, in accordance with CIRIA guidance. The exact location, geometry, and outlet configuration of the basin will be determined following a detailed topographical and drainage connectivity assessment. Where possible, the basin should be integrated with landscaped areas or public open space, creating opportunities for biodiversity enhancement and visual amenity, while contributing to the overall stormwater management capacity.'

And add the following image in the 'Stormwater Management' section in A1.2:



Add 'Stormwater Management' section in A1.3:

'At present, Sites 5 and 6 are characterised as compact urban plots, largely

occupied by existing buildings. While, Site 4 remains greenfield, offering more flexibility for surface water management interventions. If these three sites are developed collectively under a coordinated masterplan, Site 4 could function as a green infrastructure site. This would allow runoff from Sites 5 and 6 to be conveyed to Site 4, where stormwater attenuation could be achieved. Flow control devices could then regulate discharge to the public stormwater network, ensuring compliance with the greenfield runoff rate or a minimum of 2 L/s, in line with CIRIA SuDS design guidance. However, if the sites are developed individually on a piecemeal basis and Town Centre development is anticipated at these sites. Therefore, limited green opportunities will be available. In this scenario, surface water management should focus on building-integrated SuDS measures, including green roofs, tree infiltration pits, bioretention planters, and permeable paving to promote interception, filtration, and local storage of runoff. Given the limited space, underground storage tanks will be essential to provide adequate attenuation capacity. These tanks should be designed to restrict outflow to the equivalent greenfield runoff rate, preventing surcharging of the downstream public drainage network and reducing the risk of localised flooding.'

Add 'Stormwater Management' section in A1.4:

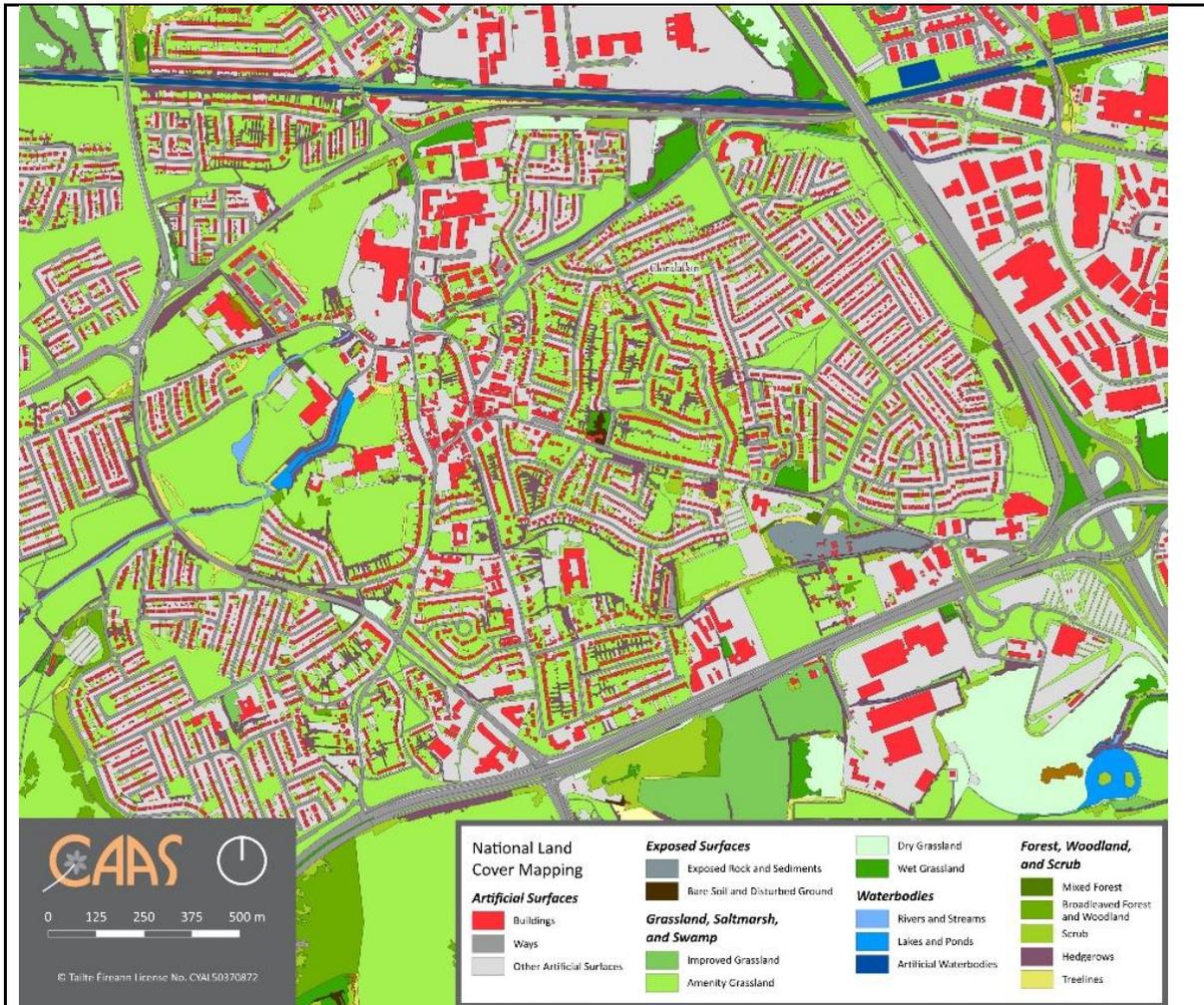
'Given the anticipated use as Town Center with high -density redevelopment, the incorporation of surface -based attenuation features such as swales or attenuation ponds may be constrained. Nevertheless, a strong emphasis should be placed on decentralised SuDS measures that can effectively manage runoff close to source. These may include green roofs and podium planting to reduce rainfall impact, tree -pit infiltration systems to promote local infiltration, and permeable paving for car parks or access areas to attenuate flows and improve water quality. Where feasible, landscaped zones or setback areas along the site's perimeter could accommodate bioretention planters or shallow rain gardens, contributing to both hydraulic control and visual amenity. Nevertheless, underground attenuation storage should be provided to capture excess runoff, with flow -controlled devices before connecting to the existing public stormwater network. Discharge from the site should be limited to the greenfield runoff equivalent or a minimum of 2 L/s, in line with CIRIA guidance.'

Submission No.	Submission Summary and CE Response
SD-C396-6 Office of Public Works	<p>Submission Summary: The OPW welcome the intention to include present day flood risk mapping for Clondalkin to demonstrate the current predicted flood risk within LPF boundary.</p> <p>The OPW also welcomes the inclusion of stormwater management sections for each opportunity site.</p> <p>CE Response: The content of the submission is noted and welcomed.</p>

<p>SD-C396-9 Office of the Planning Regulator</p>	<p>Submission Summary: The OPR welcomes the additions and clarification relating to the Flood Zones and the inclusion of additional Nature Based Solutions and Sustainable urban Drainage System (SuDS) text to the Strategic Flood Risk Assessment.</p> <p>CE Response: The Council welcomes the submission.</p>
<p>CE Recommendation:</p> <p>It is recommended that the Proposed Material Alteration SFRA2 to Variation No. 1 be adopted.</p>	

Strategic Environmental Assessment

<p>Material Alteration Number: SEA 1</p>
<p>Section 4.6</p>
<p><i>Add Táihte Éireann National Land Cover Map into the Strategic Environmental Assessment Environmental Report in section 4 and include a title for the map as follows:</i></p> <p>‘The Táihte Éireann National Land Cover Map shows land cover across the Clondalkin area, including artificial surfaces, grassland, waterbodies and hedgerows.’</p>



Submission No.

Submission Summary and CE Response

[SD-C396-8](#)
[EPA](#)

Submission Summary:

The EPA acknowledge the notice to the public consultation. The submission notes the proposed SEA determination.

The submission states that the EPA focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. The submission notes that the EPA functions do not include approving or enforcing SEAs or plans.

The submission states that it is a priority of the EPA to focus on reviewing and commenting on key sector plans and notes that the EPA provides a 'self-service-approach' via guidance document 'SEA of Local Authority Land Use Plans-EPA Recommendations and Resources'. This document sets out key recommendations for integrating environmental considerations into Local Authority land-use plans. These should be considered, as appropriate and

relevant to the alterations. The following is noted in respect of the proposed alterations:

- **Sustainable Development:** In proposing alterations, the EPA have stated that SDCC should ensure it is consistent with the need for proper planning and sustainable development. In considering the alterations, SDCC should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans. Finally, SDCC should ensure that the Variation is consistent with key relevant higher-level plans and programmes.
- **Future Modifications to the Variation:** The EPA state where future changes to the Variation are proposed, they should be screened for likely significant effects in accordance with SEA Regulations.
- **SEA Statement - 'Information on the Decision':** The EPA state once the Variation is adopted, an SEA Statement should be prepared that summarises how environmental considerations have been integrated into the Variation, how the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation, the reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with and the measures decided upon to monitor the significant environmental effects of implementation of the Variation.

CE Response:

It is considered that the proposed material alterations comply with the requirements in relation to sustainable development set out in the submission.

CE Recommendation:

It is recommended that the Proposed Material Alteration SEA1 to Variation No. 1 be adopted.

3.0 Submissions / Observations made which are outside of the scope of the Proposed Material Alterations

Section 13(6)(ad)(ii) states in relation to the matters to be taken into account at this stage of the process that the written submissions or observations with respect to the proposed material alterations and/or the environmental assessments shall be taken into account by the authority before the variation of the development plan is made. Given the number of submissions which addressed issues which were outside of the scope of the Material Alterations, and therefore could not be included in the formal summary of relevant submissions, it was considered appropriate to include a summary of these submissions and to provide any clarifications possible, notwithstanding the fact that they cannot be considered at this stage of the process and therefore no formal recommendation can be made in relation to them.

Chapter 3: Climate Action and Infrastructure	
Submission No.	Submission Summary and CE Response
SD-C396-1 Tara Horigan	<p>Submission Summary:</p> <p>The Health and Safety Authority has indicated that their document entitled ‘Guidance on technical land-use planning advice’ should be consulted and that it would expect ‘the planning guidelines’ (inverted commas added) to contain:</p> <ol style="list-style-type: none"> 1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU. 2. The consultation distances and generic advice, where applicable, supplied by the Authority to South Dublin County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority. 3. A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments. 4. Mention of the following notified establishments: Microsoft Grangecastle, BOC Gases Bluebell, Kayfoam Woolfson and Irish Distillers Fox and Geese. <p>CE Response:</p> <p>The content of the submission is noted. However, the submission content is not included as part of any Proposed Material Alteration to the Draft Plan. Consequently, the submissions request cannot be</p>

	<p>considered at this stage of the plan-making process. It is further noted that the content raised in the submission has previously been addressed in the Chief Executives Report on the Proposed Variation No. 1 to the County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework which was published on 5th November 2025 on the Council’s public consultation portal (Draft Clondalkin Local Planning Framework South Dublin County Council's Online Consultation Portal). The response made clear that there were no Seveso sites within consultation distance of the lands within the Variation. Furthermore, policy and objectives for Seveso sites (Comah) are contained within the adopted County Development Plan.</p>
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CE Recommendation:	
None.	

Chapter 5: Sustainable Movement

Submission No.	Submission Summary and CE Response
SD-C396-3 Jessica Keogh	<p>Submission Summary:</p> <p>The submission expresses concern over the fact that the Council is ignoring the views of local people which is described as ‘falling on deaf ears’. It notes also that the gate in question has been in place for over 40 years and that people in Clondalkin have been able to access the Old Nangor Road without the need to have a walkway through a private estate for all that time.</p> <p>The submission highlights the anxiety generated by the concern around anti-social behaviour which the proposal has generated.</p> <p>The submission points out that the time allocated for consultation did not suit people who work.</p> <p>The submission asks that the Council heeds the objections of the constituents who live in the area. They are not being raised for no reason.</p> <p>The opening of the gate would lead to more parents parking cars at the opening to leave children out to get to school through the estate. Residents bought houses here so that they could have security.</p> <p>The proposed opening also raises concerns about the safety of children who live in the estate.</p> <p>The objection is made on behalf of all Cherrywood Residents.</p> <p>CE Response:</p>

	<p>The content of the submission is noted. However, the submission content is outside the remit of any Proposed Material Alteration to the Draft Plan.</p> <p>The principle of inclusion of the secondary permeability route referred to has been established through the decision (resolution) of the Council at the meeting held on the 11th of December 2025. As such the submission does not relate to the Material Alteration MA7 referred to in the submission as the MA relates to the separately identified strategic permeability routes proposed in the Variation / LPF. Notwithstanding this, the following objectives of the LPF relating to permeability are noted;</p> <p>SM5 Objective 2: To encourage permeability improvements in general, including those identified as secondary permeability links, at suitable locations following appropriate consultation, throughout the Plan area.</p> <p>SM5 Objective 4: To engage with the community prior to any formal Part 8 or related process to facilitate consultation on proposed new links and their design.</p>
<p>SD-C396-5 National Transport Authority</p>	<p>Submission Summary:</p> <p>The NTA submission reiterates the following recommendations made in its submission to the Draft Plan:</p> <ul style="list-style-type: none"> • The section 'Roads, Traffic and Junction Management' should include reference to the relationship between the plan area, national road network and national roads policy. • SM11 Objective 5 should be amended to provide an assessment of the effect of implementation of the LTP measures against the objectives of the LTP. <p>CE Response:</p> <p>The content of the submission is noted. The NTA recommendations have been followed in this regard. The Chief Executive's Report on the Proposed Variation No. 1 to the County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework which was published on 5th November 2025 on the Council's public consultation portal (Draft Clondalkin Local Planning Framework South Dublin County Council's Online Consultation Portal), stated the following:</p> <p>'Amend SM9 Objective 1 to make reference to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012 to read from:</p> <p>SM9 Objective 1: To assess the need for junction improvements, upgrading where necessary, to improve road safety for all users, giving priority to those most vulnerable, while providing for traffic flow in and out of the village centre</p>

To read:

SM9 Objective 1: To assess the need for junction improvements, upgrading where necessary, to improve road safety for all users, giving priority to those most vulnerable, while providing for traffic flow in and out of the village centre **having due regard to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012.**

At the special council meeting on the 11th of December 2025, these amendments were agreed. Having reviewed all amendments arising, this amendment was not considered material in nature as the measures included are already provided for in the South Dublin County Development Plan 2022-2028. This variation will become a part of the County Development Plan and the amendment was not included as a material alteration.

In this regard, the following objective of the County Development Plan is noted;

‘SM6 Objective 4: To maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012), the Trans-European Transport Networks (TEN-T) Regulations and with regard to other policy documents such as the TII M50 Demand Management Report 2014 and the N4 and N7 Corridor Study 2017.’

With regard to the changes to the monitoring, the alteration was agreed at the special council meeting on 11th December and was considered to be non material and will be incorporated into the final variation.

Amend SM11 Objective 5 to read from:

SM11 Objective 5: To review the Local Transport Plan for Clondalkin, following implementation of the measures in this Plan, to establish the effect the interventions have had on reducing traffic and improving mode share and safety within the village and to examine whether a further review of high level interventions are required.

To read:

SM11 Objective 5: To review the Local Transport Plan for Clondalkin, **to assess the effect of implementation of the LTP measures against the Objectives of the LTP, and** to establish the effect the interventions have had on reducing traffic and improving mode share and safety within the village and to examine whether a further review of high level interventions are required.

CE Recommendation:

None.

Chapter 8: Urban Design Strategy

Submission No.	Submission Summary and CE Response
SD-C396-2 James O'Brien	<p>Submission Summary:</p> <p>The submission states that the Urban Design Strategy does not take into account in the heights of properties in Millpark. The submission suggests that the two story Millpark houses (No. 129 – 144) will be overshadowed by the proposed Ninth Lock development.</p> <p>The submission requests that the council should investigate the height of the Millpark residential structures along the boundary line.</p> <p>CE Response:</p> <p>The content of the submission is noted. However, the submission content is outside the remit of any Proposed Material Alteration to the Draft Plan. Notwithstanding this the following is noted.</p> <p>In respect of the western boundary of the site adjoining the ‘Contextual Analysis’ for the Ninth Lock Road Framework Site, the LPF (on page 101) states as follows; <i>‘The western edge of the framework site is adjacent to finer grain historic and contemporary housing and should respond to these. Across the 400 + m of the framework site proposals will need to reconcile this difference in context.’</i></p> <p>The key to figure 8.32 also requires that the exiting tree line to the western boundary of the site is retained and enhanced.</p> <p>These provisions of the Framework Site provide that the detailed design of future development on the framework site considers the residential amenity of adjoining properties at Millpark.</p>
<p>CE Recommendation:</p> <p>None.</p>	

Chapter 9: Implementation and Monitoring

Submission No.	Submission Summary and CE Response
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<p>SD-C396-5 National Transport Authority</p>	<p>Submission Summary: The NTA recommend that the 'Implementation' column of Table 9.1 should include specific reference to the LTP, as recommended in their Draft Plan submission.</p> <p>CE Response: The content of the submission is noted. The NTA recommendation has been followed in this regard. The Chief Executive’s Report on the Proposed Variation No. 1 to the County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework which was published on 5th November 2025 on the Council’s public consultation portal (Draft Clondalkin Local Planning Framework South Dublin County Council's Online Consultation Portal), stated the following:</p> <p>‘Amend Table 9.1, in the ‘implementation’ column of table 9.1 under ‘Sustainable Movement for All’, to include the following text: ‘That the transport and movement objectives of the LPF be implemented and considered against their achievement of the measures set out in the LTP.’</p> <p>With regard to the changes to the implementation and monitoring and this table, the alteration was agreed at the special council meeting on 11th December and was considered to be non-material and will be incorporated into the final variation.</p>
<p>CE Recommendation:</p> <p>None.</p>	

General	
Submission No.	Submission Summary and CE Response
<p>SD-C396-5 National Transport Authority</p>	<p>Submission Summary: The NTA notes that Material Alterations to the Draft Local Transport Plan (LTP) have not been proposed and supports the publication of the LTP with the Final LPF (the Variation) for Clondalkin.</p> <p>CE Response: The content of the submission is noted.</p>
<p>SD-C396-10 Irish Water</p>	<p>Submission Summary: The submission states that Uisce Éireann have no observations to the proposed material alterations in respect of Variation No. 1 of Clondalkin LPF.</p> <p>CE Response:</p>

	The content of the submission is noted.
SD-C396-11 Transport Infrastructure Ireland	<p>Submission Summary: The submission from TII states that TII have no observations to the proposed material alterations in respect of Variation No. 1 of Clondalkin LPF.</p> <p>CE Response: The content of the submission is noted.</p>
<p>CE Recommendation: None.</p>	

Appendix 1: Proposed Material Alterations to which no submissions referred and which have been recommended for adoption in Section 2 of this report

Chapter 2: Vision and Strategic Objectives

Material Alteration Number:	MA 1
Location in Draft LPF (Section and Page No.)	Sections 2.5 (page 14), Section 9.1 (page 112 and 113) and page 3
Figure or Table No. (if applicable)	Table 9.1
<p><i>Amend strategic objectives on page 3, in Section 2.5 on page 14 and in Table 9.1 on pages 112 and 113:</i></p> <p><i>Amend the first Strategic Objective as follows;</i></p> <p>‘Promote good urban design and healthy placemaking to create a strong sense of place and to build positively on Clondalkin’s rich heritage and identity’.</p> <p><i>And the fourth Strategic Objective as follows;</i></p> <p>‘Ensure that areas of concentrated new growth are well connected to the town village centre, existing and planned transport nodes, and to the surrounding areas, ensuring the necessary infrastructure is provided as required, adding to the vitality of the town village.’</p> <p><i>And the sixth Strategic Objective as follows;</i></p> <p>‘Protect biodiversity, while Sstrengthening and expanding the existing green infrastructure, as the foundation of a green and blue infrastructure network in the village and surrounding areas.’</p>	

Chapter 4: Green Infrastructure

Material Alteration Number:	MA 2
Location in Draft LPF (Section and Page No.)	Section 4.4 (page 30)
Figure or Table No. (if applicable)	N/A
<p><i>Amend GI3 Objective 2 as follows:</i> ‘Reinforce and extend GI stepping stones within the village core and its approach, through emerging village enhancement and other schemes by retaining and protecting existing street trees and pockets of open space and planting new trees, where feasible. Only where reasons are clearly demonstrated and reasoned, Where should Village Enhancement Schemes or new development requires the removal of trees, remove existing trees, in that instance appropriate replacement planting shall be identified within the Plan area.’</p>	

Material Alteration Number:	MA 3
Location in Draft LPF (Section and Page No.)	Section 4.6 (page 34)
Figure or Table No. (if applicable)	N/A
<p><i>Amend GI7 Objective 1 as follows:</i> ‘Improve the ecological value and connectivity of landscape features within new development through the implementation of the Green Space Factor, ensuring that all relevant developments meet the Green Space Factor score. In particular, ensure that all new development:</p> <ul style="list-style-type: none"> a) Avoids sensitive sites and features through site location and/or site design b) Retains natural features, to the greatest extent possible, as informed by ecological assessments. b)c) Provides for native tree and ecologically friendly planting on new development sites in line with public realm recommendations. a)d) All new developments are Is designed in accordance with SDCC’s Sustainable Drainage Explanatory, Design and Evaluation Guide 2022 or as amended and should incorporate Nature Based Solutions into the site design.’ 	

Chapter 5: Sustainable Movement

Material Alteration Number:	MA 5
Location in Draft LPF (Section and Page No.)	Section 5.6 (page 44)
Figure or Table No. (if applicable)	N/A
<p><i>To amend SM2 Objective 1 to read:</i> ‘To support the development of walking infrastructure within the village and wider LPF area, by enhancing walking through increased permeability, the improvement of pedestrian crossings, the widening of footpaths to support universal access where feasible, and an attractive public realm facilitated by village enhancement schemes.’</p>	

Material Alteration Number:	MA 6
Location in Draft LPF (Section and Page No.)	Section 5.6 (page 47)
Figure or Table No. (if applicable)	N/A
<p>‘To ensure that new development and key lands maximise the potential for active travel connectivity between the areas outside the village centre, including the Ninth Lock Framework site, to the village centre, local services and schools and to public transport.’</p>	

Chapter 6: Community, Homes and Employment

Material Alteration Number:	MA 11
Location in Draft LPF (Section and Page No.)	Section 6.2 (page 57)
Figure or Table No. (if applicable)	N/A
<p><i>Amend CHE4 Objective 1 as follows:</i> ‘To continue to deliver on play spaces within Clondalkin, ensuring that existing estates are considered for play provision in accordance with SDCC’s Play Policy 2025-2030, and new residential and mixed-use developments include play spaces to the standard required as part of their design and delivery.’</p>	

Material Alteration Number:	MA 12
Location in Draft LPF (Section and Page No.)	Section 6.2 (page 59)
Figure or Table No. (if applicable)	N/A
<p><i>To include a new objective in Chapter 6 of the LPF under CHE8: Social Inclusion as follows:</i> ‘To support the delivery of a dedicated youth facility in Clondalkin where the need is identified by the youth service providers.’</p>	

Material Alteration Number:	MA 13
Location in Draft LPF (Section and Page No.)	Section 6.2 (page 59)
Figure or Table No. (if applicable)	N/A
<p><i>To include a new objective in Chapter 6 of the LPF under CHE8: Social Inclusion as follows:</i> ‘To support the designation of Clondalkin as an Autism Friendly Town.’</p>	

Material Alteration Number:	MA 14
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Location in Draft LPF (Section and Page No.)	Section 6.3 (page 63)
Figure or Table No. (if applicable)	N/A
<p><i>To amend CHE13 Objective 1 on page 63 as follows:</i> ‘To support the provision of a mix of tenure types, housing sizes and typologies within Clondalkin LPF in creating the creation of suitable accommodation for all in promoting sustainable and mixed income communities and, while supporting the delivery of social, cost rental and affordable housing by SDCC, LDA, AHBs or other relevant providers, discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social, social rental, cost rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) in line with the Housing Strategy and Interim HNDA of the South Dublin County Development Plan.’</p>	

Material Alteration Number:	MA 15
Location in Draft LPF (Section and Page No.)	Section 6.4 (page 64)
Figure or Table No. (if applicable)	N/A
<p><i>Insert new objective in Chapter 6 of the LPF under CHE16: Village Improvement as follows:</i> ‘To facilitate and promote the use of vacant/obsolete floorspace within Clondalkin Village for startup enterprise or cultural uses such as arts and crafts or similar subject to the relevant zoning and placemaking objectives of the County Development Plan and the Local Planning Framework’.</p>	

Material Alteration Number:	MA 16
Location in Draft LPF (Section and Page No.)	Section 6.4 (page 66)
Figure or Table No. (if applicable)	N/A
<p><i>Insert a new objective in Chapter 6 of the LPF under CHE17: Retail and Services as follows:</i> ‘Support the concept of Clondalkin as a Fairtrade Town.’</p>	

Chapter 7: Conservation and Built Heritage

Material Alteration Number:	MA 17
Location in Draft LPF (Section and Page No.)	Section 7.4 (page 77)
Figure or Table No. (if applicable)	N/A
<p><i>Amend CBH8 Objective 4 as follows:</i> ‘To promote SDCC’s Shop Front Grant Scheme and Shop Front Design Guide to improve the appearance of independently owned and other shops fronting public streets so as to enhance Clondalkin’s visual cohesion and attractiveness, particularly within the village core, having due regard to the recommendations in the Clondalkin Village Architectural Conservation Area 009 Character Appraisal and Recommended Safeguarding Policies.’</p>	

Chapter 8: Urban Design Strategy

Material Alteration Number:	MA 18
Location in Draft LPF (Section and Page No.)	Section 8.5.2 (page 93)
Figure or Table No. (if applicable)	Figure 8.13
<p><i>Amend Figure 8.13 on page 93 of the Draft LPF which in error had shown the location of the Mill Centre Car Park Mini Framework instead of the correct location of the Old Nangor Road Mini Framework as shown below.</i></p> <p>Current Draft LPF Figure 8.13 (Extract)</p>  <p>Proposed Change to Draft LPF Figure 8.13 (Extract)</p>	



Material Alteration Number:	MA 19
Location in Draft LPF (Section and Page No.)	Section 8.5.2 (page 93)
Figure or Table No. (if applicable)	Figure 8.15
<p><i>Amend Figure 8.15 on page 93 of the Draft LPF to illustrate more clearly that Old Nangor Road is two way.</i></p> <p>Current Draft LPF Figure 8.15 (Extract)</p>	



Proposed Change to Draft LPF Figure 8.15 (Extract)



Material Alteration Number:	MA 21
Location in Draft LPF (Section and Page No.)	Section 8.5.3 (page 95)
Figure or Table No. (if applicable)	N/A
<p><i>Add an additional parameter within the Water Tower section on page 95 of the Draft LPF to state:</i></p> <p>‘Ensure access and wayleave to the watermains which run adjacent to the water tower, going across Monastery Road, are maintained.’</p>	

Material Alteration Number:	MA 22
Location in Draft LPF (Section and Page No.)	Section 8.5.3 (page 95)
Figure or Table No. (if applicable)	N/A
<p><i>Add an additional bullet point under the parameters for development relating to the Dutch Village on page 95 of the Draft LPF to state:</i> 'To take account of the recorded monument status of the adjacent existing monument (Mon. No. DU017-043---)'</p>	

Material Alteration Number:	MA 23
Location in Draft LPF (Section and Page No.)	Section 8.6 (page 96)
Figure or Table No. (if applicable)	N/A
<p><i>Amend the wording of the Ninth Lock Road to Old Nangor Road VES Design Parameters as follows:</i> 'Facilitate the re-design of the Civic Plaza at the Clondalkin Civic Office as a key node within the village centre, providing for local events and civic engagement, integrating it into the emergence of the Ninth Lock Road VES and active travel schemes.'</p>	

Material Alteration Number:	MA 24
Location in Draft LPF (Section and Page No.)	Section 8.6.2 (page 98)
Figure or Table No. (if applicable)	N/A
<p><i>Amend UD6 Objective 2 on page 98 as follows:</i> 'To support the rebalancing and redistribution of space within Clondalkin Village, notably to Main Street and at the junction with Tower Road, Convent Road, Orchard Road, Pope Lane and Laurel Park to provide for an improved pedestrian and cycle environment, urban greening and nature-based SuDS</p>	

features where feasible, and increased activation, making it more vibrant, engaging, and welcoming for all.'

Material Alteration Number:	MA 26
Location in Draft LPF (Section and Page No.)	Section 8.7.2 (page 109)
Figure or Table No. (if applicable)	N/A
<p><i>Amend KF3 Objective 1 on page 109 as follows:</i> 'To protect the historic integrity of Knockmeenagh Lane and associated Slí Mor while supporting sensitive solutions to its improvement as an active travel route along its existing connection from Monastery Road to New Road, providing for potential new active travel connections to and from the framework site to the Lane and further northwards.'</p>	

Appendix 2: Material Alteration 20, Mini Framework 'Tower Road / Main Street Junction'

MINI FRAMEWORK FOR TOWER ROAD/ MAIN STREET JUNCTION

The mini-framework addresses the future development potential of the eastern frontage of Tower Road from the Tower Shopping Centre to the junction with Main Street to the south. The subject area is located within ACA 009 Clondalkin Village, with its associated discouraging of the amalgamation of adjoining plots. As such, the area is considered as three key potential development plots per the diagram opposite:

1. Tower Shopping Centre
2. The Dispensary Building
3. 04 Tower Road, Dolcan House & 9-10 Main Street

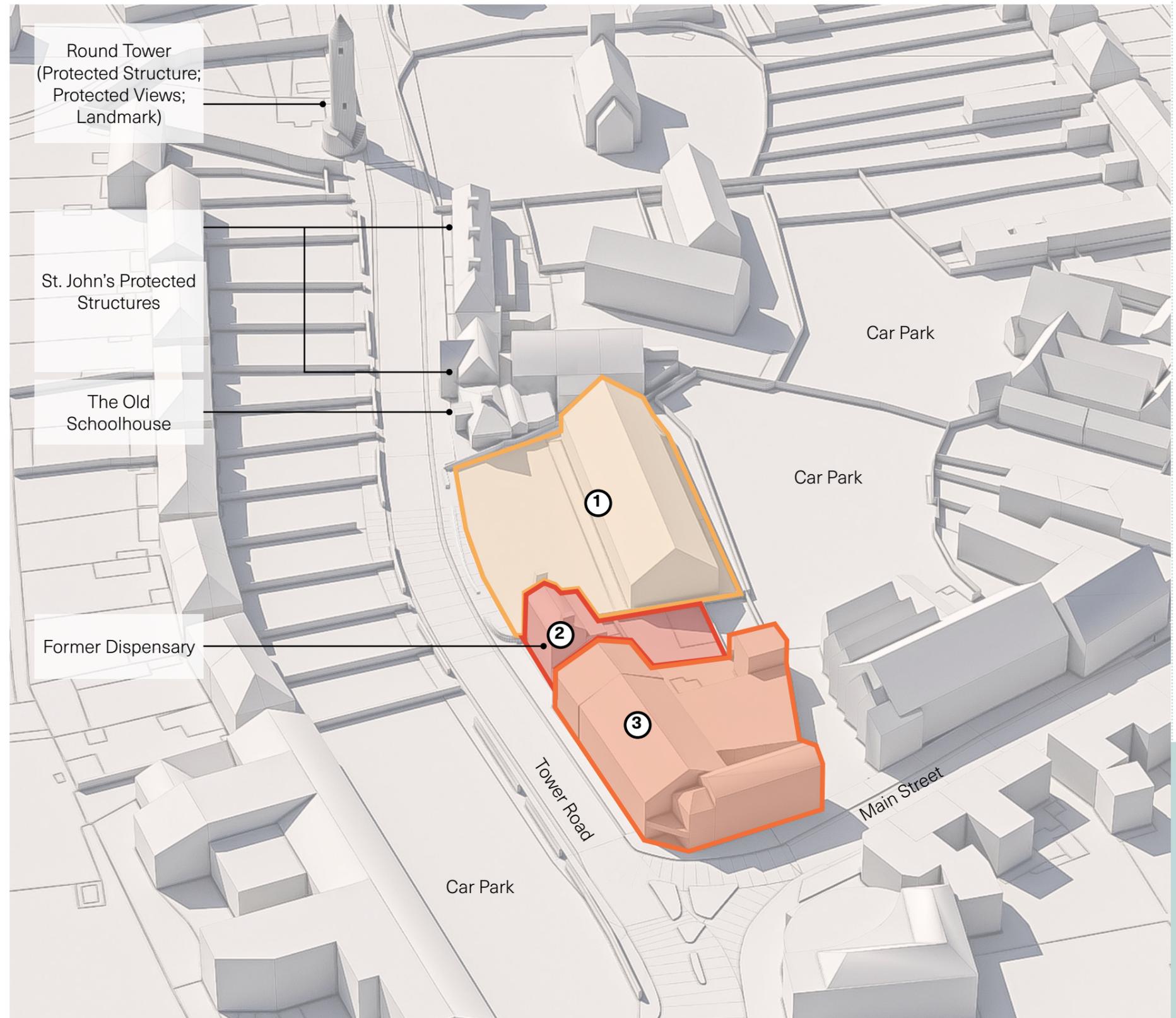
Context

Collectively, the sites are well-located in the village centre area at the junction of two key streets and so in proximity to key transport connections and walkable to village and town centre uses. As such, intensification of use through redevelopment is supported in principle, in mixed-use forms that maintain ground floor commercial activity with street active frontages. Any such redevelopment would need to be sensitive to the particular historic character of the village centre setting.

Setting

The sites are located within ACA 009 Clondalkin Village, in proximity to several Protected Structures and immediately adjacent to the Old Schoolhouse which is identified as a 'positive building' by the ACA Appraisal document.

Specific characteristics of the historic core that contribute positively to its character include glimpsed views and stepped roofscapes. The ACA notes that *'the irregular building line [...] that separate the buildings reveal traditional gables and hipped roof profiles'*. It notes that *'the simple form of the traditional vernacular forms, with vertical window openings on the upper forms and stepped roofscape [...] form part of the special character of the Village'*.



This suggests that while the development of contextually appropriate responsive built form for future proposals on each of the three sites will have certain design considerations in common, they will each need to respond to particular cues from the historic context.

Future redevelopment of the Tower Shopping Centre Site (1) will have some flexibility in bringing the building line out toward Tower Road within the current surface parking frontage. However, this will need to consider the context of the two 'positive buildings' by which the site is flanked, and also maintain a characteristic boundary wall treatment to Tower Road. Consolidating a new building line between these buildings will not be appropriate as it would conceal both the stone gable and steeply pitched roof of the protected Village National School in views from the south and the unusual gabled chimneystack of the Dispensary Building in views from the north.

The Dispensary Building (2) is itself identified as a 'positive building' within the ACA and described as *'an attractive 19th century vernacular building with pitched roof and gable chimneystacks'* in the ACA Appraisal Document. It is noted that signage clutter *'distracts from its visual amenity'* and that there are no historic shopfronts in the ACA. However, there are significant non-original alterations and additions to the rear of the Dispensary Building, suggesting that redevelopment of the site could be considered as long as the form of the original building is maintained, particularly as it relates to the exposed gable viewed from the north.

The partial urban block formed by Dolcan House and adjoining properties on Tower Road and Main Street (3) has a similar condition of a stepped building line revealing a characteristic steeply pitched gable when viewed from Main Street. The scale of the assembled site suggests there is potential for backlands infill and redevelopment, while the significant corner location suggests that additional height might be considered. However, such height would be modest and considered as a local marker for placemaking legibility only.



TOWER SHOPPING CENTRE FRONTAGE



PROTECTED STRUCTURE GABLE FROM SOUTH



DISPENSARY BUILDING GABLE FROM NORTH

Connections

The village centre strategy suggests that the mini-framework area can facilitate future east-west connectivity across the village centre area. Two potential links are apparent that should not be prejudiced by future proposals.

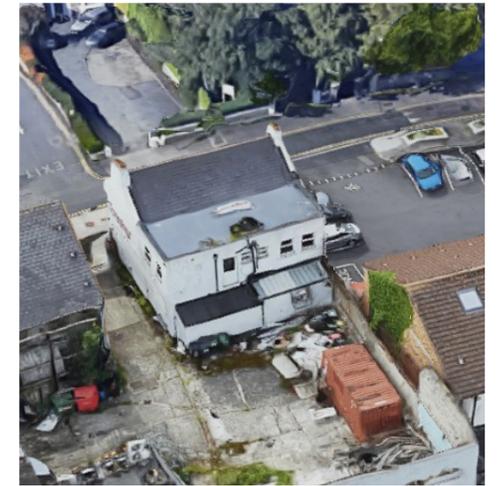
Firstly, the free-standing nature of the Dispensary Building should be maintained to protect its positive contribution to the streetscape in line with the ACA Appraisal Document. This results in a link through to the car-park area to the rear of the subject area that lines up with the existing lane to Moyle Park College that runs from the carpark along the edge of the retail parade. Preserving this link in future proposals retains the possibility of connecting to the adjacent vacant lands and ultimately to Clondalkin Leisure Centre.

Another connection is possible through the Tower Shopping Centre site, along either the north or southern edges. Like the Parade link, this would enable direct access from Tower Road to the nested parking areas within the urban block that could connect to Orchard Road and Pope Lane if future public realm proposals were to be developed.

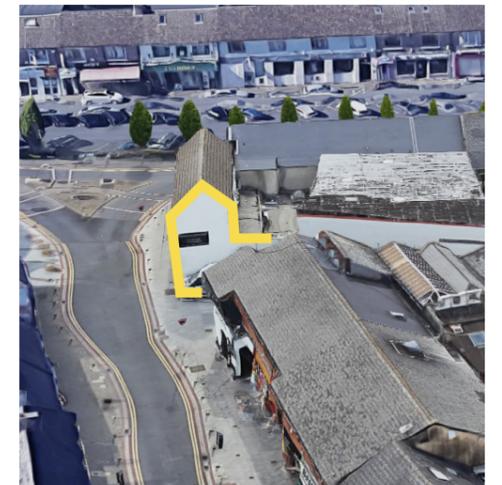
Inclusivity & Variety

Given the location of these routes, it is not envisaged that they would find particular expression through the development of local marker heights to Tower Road. It will be important however for new connections to be attractive and well lit, with either active frontage or own-door entry where possible to animate the routes.

To this end, the existing blank boundary wall condition to the rear of the three sites is noted. Articulation of secondary massings with localised amplification of height could be considered to rear/backlands infill areas of the sites along this frontage to the nested car-parking areas where they aid future legibility, wayfinding and a sense of space in any future public realm interventions in the parking areas.



NONORIGINAL ALTERATIONS TO DISPENSARY BUILDING



STEPPED BUILDING LINE & REVEALED GABLE FROM MAIN STREET



POTENTIAL FUTURE LINK TO MOYLE PARK COLLEGE LANDS

Indicative Layout

The layout opposite is intended for illustrative purposes only to demonstrate the various opportunities suggested by contextual analysis of the subject area in line with the wider objectives of the village centre strategy within the urban design framework of the Local Planning Framework.

Tower Road/ Main Street Junction - Parameters for Development

Key design guidance for any future development options should include:

- To preserve the character of the village and its setting, proposals will be required to demonstrate that proposed height, scale, and massing is responsive to the historic context and complements characteristic features of built form in the village centre and does not diminish its distinctiveness of place.
- Prevailing heights in the immediate context and the sensitivity of adjoining positive buildings are such that no significant increases in building height are envisaged, with new development predominately in the 2-3 storey range and limited deployment of local marker heights to aid the legibility of future routes.
- New development will complement the characteristic wall to window ratios and steep gables of existing development, and employ finishes and material complementary to the historic setting.
- New development on the site of the Dispensary Building will maintain the positive building and focus on infill redevelopment to the rear of the plot and in the location of existing non-original alterations.
- New development to the Tower Shopping Centre can consider redevelopment of the frontage to Tower Road to move the building line subject to contextual appropriateness, and in development of the backlands should support the development of future public links.
- Redevelopment of assembled lots at Dolcan House should consider the stepped building line to Main Street and the retention of characteristic built form. Increased heights may be considered on this prominent corner, and a positive contribution to the streetscape should be made developing more visual interest to the boundary treatment to the carpark.

