

Clondalkin

Draft Local Planning Framework

Chief Executive's Report for Proposed
Variation 1 to the County Development
Plan

November 2025

Variation 1



Table of Contents

List of Acronyms	2
1.0 Introduction	3
1.1 Preamble	3
1.2 Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028	3
1.3 Environmental Assessments	4
1.4 Public Consultation	4
1.5 Statutory Bodies.....	6
1.6 Submissions Received	6
1.7 List of Submissions	7
2.0 Summaries, Responses and Recommendations to Issues Raised in Submissions.....	17
2.1 Observations, Submission and Recommendations from the Office of the Planning Regulator (OPR) - Submission SD-C367-154	17
2.2 Issues Raised and Recommendations from the National Transport Authority (NTA) - Submission SD-C367-136.....	23
2.3 Observations, Submission and Recommendations from the Eastern and Midlands Regional Assembly (EMRA) – Submission SD-C367-20	27
2.4 All Other Submissions.....	32

List of Acronyms

AA – Appropriate Assessment

ACA – Architectural Conservation Area

CDP – County Development Plan

DCC – Dublin City Council

DM – Development Management

DoEY – Department of Education and Youth

DHLGH – Department of Housing, Local Government and Heritage

EMRA – Eastern Midlands Regional Authority

FAS – Flood Alleviation Scheme

GI – Green Infrastructure

LPF – Local Planning Framework

LTP – Local Transport Plan

NPF – National Planning Framework

OPW – Office of Public Works

RPO – Regional Policy Objective

RPS – Record of Monuments and Places

RSES – Regional Spatial and Economic Strategy

SDCC – South Dublin County Council

SEA – Strategic Environmental Assessment

SFRA – Strategic Flood Risk Assessment

SuDS – Sustainable urban Drainage Systems

SWOC – Strengths, Weaknesses, Opportunities and Challenges

URDF – Urban Regeneration Development Fund

VES – Village Enhancement Scheme

WFD – Water Framework Directive

1.0 Introduction

1.1 Preamble

The South Dublin County Development Plan 2022-2028 was adopted on the 22nd of June 2022 and came into effect on the 3rd of August 2022. The proposed Draft Local Planning Framework for Clondalkin is proposed as the first variation to the County Development Plan and will form part of the Plan by way of an appendix.

As set out in the Planning and Development Act, 2000 (as amended), a Planning Authority may at any time, for reasons stated, decide to make a variation of a Development Plan. The procedure for such a variation is set out in Section 13 of the Planning and Development Act 2000 (as amended).

It should be noted that the Planning and Development Act 2024 (as amended) has not yet been fully enacted. The scheduling of the enactment is set out in the Implementation Plan for the 2024 Act. This can be found here: [Implementation Plan for the Planning and Development Act 2024](#). The implementation of the 2024 Act has no material impact on this variation process as, where variations have commenced under the 2000 Act, the variation process will continue to be progressed through the mechanisms set out in the Planning and Development Act 2000 (as amended).

1.2 Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028

In accordance with Section 13(2) of the Planning and Development Act 2000 (as amended), South Dublin County Council is proposing a variation of the County Development Plan 2022-2028.

The proposed variation is to incorporate Clondalkin Local Planning Framework (LPF) into the South Dublin County Development Plan 2022-2028. Clondalkin Village is a historic settlement located in Dublin City suburbs, and to the north of Tallaght, SDCC's County Town, and given its location within South Dublin, its historic character and heritage, as well as potential for growth, a plan has been progressed for the defined area surrounding the village.

The Clondalkin LPF is informed by the South Dublin County Development Plan 2022-2028, the National Planning Framework, the Regional Spatial and Economic Strategy, Metropolitan Area Spatial Plan, section 28 Ministerial Guidelines, including the recently released Sustainable Residential Development and Compact Settlements Guidelines (2024) and new Apartment Guidelines (2025).

Reason for the Variation:

The Clondalkin Local Planning Framework (LPF) sets out a comprehensive local planning framework with clear policies and objectives to guide future development within the plan area and to facilitate infrastructure provision and the progression of village enhancement schemes. It includes a policy framework to guide the future sustainable development of housing, employment, transportation, retail, and social infrastructure having regard to the conservation context of the historic settlement of Clondalkin. The Clondalkin LPF has been prepared to meet DQP14 Objective 3 and, EDE4 Objective 14 of the County Development Plan 2022-2028, which state:

To prepare a LAP for Clondalkin, the extent of the boundary to be defined, which will be guided by the Local Area Plans Guidelines for Planning Authorities, 2013 (Department of

the Environment, Community and Local Government) or any superseding guidelines and which will incorporate:

- *A vision for the development of Clondalkin*
- *Wider urban design principles*
- *Framework plans for larger infill sites*
- *A Conservation Plan*
- *A local Green Infrastructure strategy derived from the County GI Strategy*
- *Local Transport Plan.*

It should be noted that the CDP outlines the preparation of a Local Area Plan (LAP) for Clondalkin. Given the continually changing legislative context surrounding the existing 2000 Act and the ongoing enactment of the 2024 Act, as well as phasing and timeframes for implementation of same, it was considered a variation to the CDP, which would encompass the contents of the objective above, would be progressed to ensure the objectives of the CDP were met, as well as ensuring provision of a statutory planning framework for Clondalkin.

1.3 Environmental Assessments

In preparing the Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028 for the Draft Clondalkin Local Planning Framework, the Planning Authority determined that:

- the Proposed Variation may, if unmitigated, result in likely significant environmental effects and that SEA is required to be undertaken on Proposed Variation (Clondalkin) to the South Dublin County Development Plan 2022-2028. An Environmental Report accompanies this proposed Variation.
- the Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028 will not give rise to any effects on the ecological integrity of any European Site, alone or in combination with any other plans, programmes or projects in view of the conservation objectives of the habitats or species for which these sites have been designated; and that Stage Two AA (including the preparation of a Natura Impact Report) is not required for Proposed Variation No. 1.

In accordance with the Planning System and Flood Risk Management, Guidelines for Planning Authorities (November 2009) a Strategic Flood Risk Assessment for the proposed Variation has been conducted by JBA Consulting Engineers.

The above environmental assessments have informed the preparation of the proposed Variation – the draft Clondalkin Local Planning Framework.

1.4 Public Consultation

Pre-Draft Consultation

A series of pre-draft consultation meetings was undertaken to meet with stakeholders and residents of Clondalkin and identify key challenges and opportunities for the plan area.

The pre-draft public consultation was conducted in three rounds—spring 2023, spring 2024, and winter 2024–2025. In the early rounds of pre-draft all different views on Clondalkin and how they might be incorporated into the plan were aired, including movement, conservation, green infrastructure, housing, business, climate change and urban design. Conservation had emerged as a key consideration in the first round of consultation and in response the local authority arranged for ‘walkabouts’ within the village with employed conservation consultants and local people with heritage interests. This allowed for a deeper understanding to inform the Conservation Plan, which was prepared as part of the requirements of the development plan objectives and to inform the objectives of the LPF. However, in the second round of pre-draft consultation traffic emerged as a key concern. The high-impact transport interventions put forward as an option to address the issue of traffic congestion in Clondalkin Village were considered by those engaging with the consultation to be unsuitable or undesirable for Clondalkin. In response, South Dublin County Council contracted KPMG Future Analytics to work directly with local stakeholders to inform the development of a new suite of proposed measures. This third and final round of pre-draft consultation took place during the winter of 2024–2025 and enabled a deeper understanding of local perspectives and a pathway for actionable consensus around acceptable transport and mobility interventions for the village. This process was structured in two phases:

- Phase one took place between November and December 2024 and involved 59 one-to-one meetings with key stakeholder groups. The outcomes of this phase were used to inform the revision of the proposed measures. These revised transport and mobility measures were used in the second phase of engagement.
- Phase two took place in January 2025 and consisted of a series of participatory public workshops. As part of these workshops South Dublin County Council clarified that bus gates would not be included in the plan, there would be no new one-way streets, and there would be no new pedestrianised streets. These workshops allowed the project team to further refine and validate the proposed measures, identify emerging issues, and collaborate with the community in developing implementation approaches which will enable successful deployment of the proposed measures following their adoption in the final Local Planning Framework.

Throughout the 59 individual meetings at this third round of public consultation, a consensus-based approach was developed, and the new suite of proposed measures emerged from this consensus, with respect to the stated boundaries of community members. Throughout the workshops, feedback confirmed that this was the acceptable approach. Community members openly voiced their support of the proposed measures and their appreciation that the council had heard and responded to the desires of the community. This engagement approach transparently informed residents about the LPF process, respected the boundaries of community members, affirmed the role of the community in shaping Clondalkin, and allowed them to appreciate the benefits of the proposed measures. The two-phased approach also enabled collaborative and productive co-creation processes, with clear, consistent, and actionable outputs, (discussed below), which inform a clear understanding of the transport and mobility measures which are likely to be acceptable to the wider community.

Statutory Consultation

In accordance with Section 13(2) of the Planning and Development Act 2000 (as amended), the Proposed Variation No. 1 to the County Development Plan for the Draft Clondalkin Local Area Framework, the Strategic Environmental Assessment (SEA)

Screening Determination and Environmental Report, the AA (Appropriate Assessment) Screening and Determination, and the Strategic Flood Risk Assessment were published on the Council's consultation portal inviting observations and submissions. Additional materials published on the consultation portal were the Public Notice, Local Transport Plan, three Architectural Conservation Area (ACA) Appraisals, and the Conservation Plan.

The statutory newspaper notice was published in the Irish Times on the 26th of August 2025 and in the Tallaght Echo (in English and Irish) on the 28th of August 2025. The submission period was open on the portal from 12:00PM Tuesday 26th August 2025 until 11:59PM Monday 29th September 2025 inclusive.

Three well attended open days for members of the public were held on Thursday 4th September 2025 (SDCC – Clondalkin Office), Wednesday 10th March 2025 (SDCC – Clondalkin Office), and Wednesday 17th September 2025 (Round Tower). These consultations satisfied the statutory requirements of a variation to the county development plan.

In accordance with Section 13 (3A)(a) of the Planning & Development Act 2000 (as amended), written submissions and observations received were published on the website of the authority, <https://consult.sdublincoco.ie/en/consultation/draft-clondalkin-local-planning-framework>.

1.5 Statutory Bodies

Under Section 13(2) of the Planning and Development Act 2000 (as amended) the Planning Authority is required to send notice of the proposed variation to the prescribed authorities listed within that section and those prescribed within the Planning & Development (Strategic Environmental Assessment) Regulations 2004-2011.

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

1.6 Submissions Received

There were 235 submissions received during the public consultation period on the Draft Clondalkin Local Planning Framework of the South Dublin County Development Plan 2022-2028. In accordance with Section 13 of the Planning & Development Act 2000, as amended, written submissions and observations were published on the website of the authority, <https://consult.sdublincoco.ie/en/consultation/draft-clondalkin-local-planning-framework>

In this Chief Executive's Report submissions have been summarised by theme with the Chief Executive's response and recommendation. 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 in accordance with section 13 (4)(b) of the Planning and Development Act 2000 (as amended).

1.7 List of Submissions

Submission	Author	Type
<u>SD-C367-1</u>	Cllr. Trevor Gilligan	Staff Member
<u>SD-C367-2</u>	Health and Safety Authority	Organisation
<u>SD-C367-3</u>	Martin Kavanagh	Individual
<u>SD-C367-4</u>	Bea Carban	Individual
<u>SD-C367-5</u>	Robbie Callaghan	Individual
<u>SD-C367-6</u>	Amber Tedman	Individual
<u>SD-C367-7</u>	Svetlana Vomisescu	Individual
<u>SD-C367-8</u>	Cllr. Francis Timmins on behalf of Floraville Estate Residents	Staff Member
<u>SD-C367-9</u>	Louise Maguire	Individual
<u>SD-C367-10</u>	David Tyrell	Individual
<u>SD-C-367-11</u>	Jackie Adams	Individual
<u>SD-C367-12</u>	Barbra Connolly	individual
<u>SD-C367-13</u>	Paul and Fiona Boland	Individuals
<u>SD-C367-14</u>	Vicky Kealy	individual
<u>SD-C367-15</u>	Eileen Keany	Individual
<u>SD-C367-16</u>	Eimear Butler	Individual
<u>SD-C367-17</u>	Jackie McBride	Individual
<u>SD-C367-18</u>	Alan Whelan	Individual
<u>SD-C367-19</u>	Deirdre Gardiner	Individual
<u>SD-C367-20</u>	Eastern and Midland Regional Authority (EMRA)	Organisation
<u>SD-C367-21</u>	Janis Quane	Individual

<u>SD-C367-22</u>	Darin Maguire	Individual
<u>SD-C367-23</u>	Environmental Protection Agency (EPA)	Organisation
<u>SD-C367-24</u>	Colm Carberry	Individual
<u>SD-C367-25</u>	Niall Fagan	Individual
<u>SD-C367-26</u>	Carol Moxham Wynne.	Individual
<u>SD-C367-27</u>	Adam Byas	Individual
<u>SD-C367-28</u>	Wayne McGuire	Individual
<u>SD-C367-29</u>	Emma McGuire	Individual
<u>SD-C367-30</u>	James Mullins	Individual
<u>SD-C367-31</u>	Kim Mc Coy	Individual
<u>SD-C367-32</u>	Susan Mc Donagh	Individual
<u>SD-C367-33</u>	Robert Dillon	Individual
<u>SD-C367-34</u>	Anita Broderick	Individual
<u>SD-C367-35</u>	James Rawl	Individual
<u>SD-C367-36</u>	Kathleen Phelan	Individual
<u>SD-C-367-37</u>	Angela McGreevey	Individual
<u>SD-C-367-38</u>	Maeve Ui Mhairtin	Individual
<u>SD-C367-39</u>	Oliver Murray	individual
<u>SD-C367-40</u>	Ciara Brennan	Individual
<u>SD-C367-41</u>	Paula Dillon	Individual
<u>SD-C367-42</u>	Bernadette Brennan	Individual
<u>SD-C367-43</u>	Ian Wallace	Individual
<u>SD-C367-44</u>	Andrii Shynder	Individual
<u>SD-C367-45</u>	Danny McNeive	Individual
<u>SD-C367-46</u>	Tony Irvine	Individual

<u>SD-C367-47</u>	Carol Fagan	individual
<u>SD-C367-48</u>	Paul Malone	Individual
<u>SD-C367-49</u>	Anthony Tsylor	Individual
<u>SD-C367-50</u>	Linda Hegarty	Individual
<u>SD-C367-51</u>	Brian Kirk	Individual
<u>SD-C367-52</u>	Alan Fagan	Individual
<u>SD-C367-53</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-54</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-55</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-56</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-57</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-58</u>	Derek and Linda Meagher	Individuals
<u>SD-C367-59</u>	Alan Warren	Individual
<u>SD-C397-60</u>	Alma Courtney	Individual
<u>SD-C367-61</u>	Una O'Brien	Individual
<u>SD-C367-62</u>	Alex McDaid	Individual
<u>SD-C367-63</u>	David Tyrrell	Individual
<u>SD-C367-64</u>	Lorna Carroll	Individual
<u>SD-C367-65</u>	David Tyrrell	Individual
<u>SD-C367-66</u>	Jennifer Tracey	Individual
<u>SD-C367-67</u>	Patricia Lyaght	Individual
<u>SD-C367-68</u>	Ann Carroll	Individual
<u>SD-C367-69</u>	Rachel Millar	Individual
<u>SD-C367-70</u>	Bridget Connaughton	Individual
<u>SD-C367-71</u>	Office of Public Works (OPW)	Organisation

<u>SD-C367-72</u>	Land Development Agency (LDA)	Organisation
<u>SD-C367-73</u>	James Smith	Organisation
<u>SD-C367-47</u>	Paul McKenna	Individual
<u>SD-C367-75</u>	David Stokes	Individual
<u>SD-C3678-76</u>	Joan and Eugene Tully	Individuals
<u>SD-C367-77</u>	Mick Hallows	Individual
<u>SD-C367-78</u>	Raphael Ryan	Individual
<u>SD-C367-79</u>	Barry Spierin	Individual
<u>SD-C367-80</u>	Helen Molony	Individual
<u>SD-C367-81</u>	Irish Water	Organisation
<u>SD-C367-82</u>	Kathy O' Sullivan	Individual
<u>SD-C367-83</u>	Annette and Roger Moloney	Individuals
<u>SD-C367-84</u>	Ben Minogue	Individual
<u>SD-C367-85</u>	Susan Fahey	Individual
<u>SD-C367-86</u>	Angela Lyons	Individual
<u>SD-C367-87</u>	Ian Kelly	Individual
<u>SD-C367-88</u>	Vera Rogers	Individual
<u>SD-C367-89</u>	Michael O' Donnell	Individual
<u>SD-C367-90</u>	Avril Doyle	Individual
<u>SD-C367-91</u>	Lorraine and Paul Curtis	Individual
<u>SD-C367-92</u>	Brenda Cahill	Individual
<u>SD-C367-93</u>	Caroline Mannion	Individual
<u>SD-C367-94</u>	Transport Infrastructure Ireland (TII)	Organisation
<u>SD-C367-95</u>	The Heritage Council	Organisation

<u>SD-C3678-96</u>	Nicola Coates	Individual
<u>SD-C367-97</u>	Terry Mc Nally	Individual
<u>SD-C367-98</u>	Karen Sze Man Ho	Individual
<u>SD-C367-99</u>	Siobhan O'Neill	Individual
<u>SD-C367-100</u>	Jessica Keogh	Individual
<u>SD-C367-101</u>	Tony Wall	Individual
<u>SD-C367-102</u>	Peter Minahan	Individual
<u>SD-C367-103</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-104</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-105</u>	Cllr. Francis Timmons	Staff Member
<u>SD-C367-106</u>	John Curran	Individual
<u>SD-C367-107</u>	Derek Kelly	Individual
<u>SD-C367-108</u>	Orchard Road Residents Association	Individuals
<u>SD-C367-109</u>	Louise Doyle	Individual
<u>SD-C367-110</u>	Tom Murphy	Individual
<u>SD-C367/-111</u>	Katie Goodwin	Individual
<u>SD-C367-112</u>	Geraldine McMahon	Individual
<u>SD-C367-113</u>	Tony Browne	Individual
<u>SD-C367-114</u>	Michael McCabe	Individual
<u>SD-C367-115</u>	Liam Walsh	Individual
<u>SD-C367-116</u>	Lyndsay Doyle	Individual
<u>SD-C367-117</u>	Teresa Farry Roberts	Individual
<u>SD-C367-118</u>	James Whelehan	Individual
<u>SD-C367-119</u>	Brian Chapman	Individual
<u>SD-C367-120</u>	Tom Pitts	Individual

<u>SD-C367-121</u>	Cllr. Linda de Courcy	Staff Member
<u>SD-C367-122</u>	William Kearney	Individual
<u>SD-C367-123</u>	Cllr. Linda de Courcy	Staff Member
<u>SD-C367-124</u>	Deborah Arnold	Individual
<u>SD-C367-125</u>	Andrew Mc Cabe	Individual
<u>SD-C367-126</u>	Claire Hughes	Individual
<u>SD-C367-127</u>	Philip Coby	Individual
<u>SD-C367-128</u>	Colin Lawler	Individual
<u>SD-C367-129</u>	Huzzel Mc Neive	Individual
<u>SD-C-367-130</u>	Gill Malone	Individual
<u>SD-C367-131</u>	Caroline Tyrell	Individual
<u>SD-C367-132</u>	Huzzel Mc Neive	Individual
<u>SD-C367-133</u>	Eithne Jack	Individual
<u>SD-C367-134</u>	Sebastian Tineghe	Individual
<u>SD-C367-135</u>	Denise Shannon on behalf of herself and 108 Residents of Cherrywood Avenue	Individuals
<u>SD-C367-136</u>	National Transport Authority (NTA)	Organisation
<u>SD-C367-137</u>	Derek O Kelly	Individual
<u>SD-C367-138</u>	Paul Gogarty	TD
<u>SD-C367-139</u>	Ronan Duffy	Individual
<u>SD-C367-140</u>	John Quinlan	Individual
<u>SD-C367-141</u>	Troon Jack	Individual
<u>SD-C367-142</u>	Jamie Nolan	Individual
<u>SD-C367-143</u>	Brian Ronan	Individual

<u>SD-C367-144</u>	Clondalkin Dental	Organisation
<u>SD-C367-145</u>	People before Profit	Organisation
<u>SD-C367-146</u>	Victor Madden	Individual
<u>SD-C367-147</u>	Colin Campbell	Individual
<u>SD-C367-148</u>	Jennifer Tracey	Individual
<u>SD-C367-149</u>	Noel Carberry	Individual
<u>SD-C367-150</u>	Mia Coogan	Individual
<u>SD-C367-151</u>	Cllr. Linda de Courcy	Staff Member
<u>SD-C367-152</u>	Alan Banks	Individual
<u>SD-C367-153</u>	Electricity Supply Board (ESB)	Organisation
<u>SD-C367-154</u>	Office of the Planning Regulator (OPR)	Organisation
<u>SD-C367-155</u>	Iarnród Eireann/Irish Rail	Organisation
<u>SD-C367-156</u>	Alan Banks	Individual
<u>SD-C367-157</u>	Mrs F. O'Connell	Individual
<u>SD-C367-158</u>	Christopher Conway	Individual
<u>SD-C367-159</u>	Monica Gill	Individual
<u>SD-C367-160</u>	Patrick Duffy	Individual
<u>SD-C367-161</u>	Cllr. Linda de Courcy	Staff Member
<u>SD-C367-162</u>	Department of Housing, Local Government and Heritage	Organisation
<u>SD-C367-163</u>	Department of Education and Skills	Organisation
<u>SD-C367-164</u>	Andrea Lyons	Individual
<u>SD-C367-165</u>	Liam Reilly	Individual

<u>SD-C365-166</u>	Lynsey Jordan	Individual
<u>SD-C367-167</u>	John Murphy	Individual
<u>SD-C367-168</u>	James Wynne	Individual
<u>SD-C367-169</u>	John Loughnan	Individual
<u>SD-C367-170</u>	BDP on behalf of the Mill Shopping Centre	Organisation
<u>SD-C367-171</u>	Claire Mc Carthy	Individual
<u>SD-C367-172</u>	Jos Services	Individual
<u>SD-C367-173</u>	Ann Gilsenan	Individual
<u>SD-C367-174</u>	HSE	Organisation
<u>SD-C367-175</u>	Grainne Mc Gowan	Individual
<u>SD-C367-176</u>	Grace Keane	Individual
<u>SD-C367-177</u>	Marie Cranny	Individual
<u>SD-C367-178</u>	Terence McMenamy	Individual
<u>SD-C367-179</u>	Margueritte Sherry	Individual
<u>SD-C367-180</u>	Mark Goodwin	Individual
<u>SD-C367-181</u>	Ann Stapleton	Individual
<u>SD-C367-182</u>	Vicky Kealy	Individual
<u>SD-C367-183</u>	Nicola Flynn	Individual
<u>SD-C367-184</u>	Janet Murphy	Individual
<u>SD-C367-185</u>	Christina Ryan	Individual
<u>SD-C367-186</u>	Jennifer Tracey	Individual
<u>SD-C367-187</u>	Margaret Caddle	Individual
<u>SD -C367-188</u>	Paul McKiernan	Individual
<u>SD-C367-189</u>	Cllr. Trevor Gilligan	Staff Member
<u>SD-C367-190</u>	Miriam Anderson	Individual

<u>SD-C367-191</u>	Jamie Thompson on behalf of Riversdale Residents Association	Individual / Resident Representative
<u>SD-C367-192</u>	Eileen Cronin	Individual
<u>SD-C367-193</u>	Avril McLoughlin on behalf of Riversdale Residents Association	Resident Representative
<u>SD-C367-194</u>	Catherine Berry Byrne	Individual
<u>SD-C367-195</u>	Susan Egan	Individual
<u>SD-C367-196</u>	Nuala Burke	Individual
<u>SD-C367-197</u>	Rhona Kerins	Individual
<u>SD-C367-198</u>	Andrew Kenny	Individual
<u>SD-C367-199</u>	Woodford Resident	Individual
<u>SD-C367-200</u>	Clondalkin Residents	Individuals / Petition
<u>SD-C367-201</u>	Ryan Family	Individuals
<u>SD-C367-202</u>	The Aeton Family	Individuals
<u>SD-C367-203</u>	Philip Whitty and Family	Individuals
<u>SD-C367-204</u>	Bernadette Jewel	Individual
<u>SD-C367-205</u>	Breda Fitzsimons	Individual
<u>SD-C367-206</u>	Caroline Fallon	Individual
<u>SD-C367-207</u>	Carroll Family	Individual
<u>SD-C367-208</u>	Laura Goke	Individual
<u>SD-C367-209</u>	Cormac Dowling	Individual
<u>SD-C367-210</u>	Cronin Family	Individuals
<u>SD-C367-211</u>	Damien Bimowski	Individual
<u>SD-C367-212</u>	Donna McGlynn	Individual
<u>SD-C367-213</u>	Edel Sayce	Individual

<u>SD-C367-214</u>	Elaine Fannin	Individual
<u>SD-C367-215</u>	Elizabeth Caddle	Individual
<u>SD-C367-216</u>	Sinead McEvoy	Individual
<u>SD-C367-217</u>	J. O' Leary	Individual
<u>SD-C367-218</u>	Geraldine Courtney	Individual
<u>SD-C367-219</u>	Kay O'Byrne	Individual
<u>SD-C367-220</u>	Lestrangle Family	Individual
<u>SD-C367-221</u>	Michelle Dagg	Individual
<u>SD-C367-222</u>	Margaret Doody	Individual
<u>SD-C367-223</u>	Martin O' Keeffe	Individual
<u>SD-C367-224</u>	Mary O' Neill	Individual
<u>SD-C367-225</u>	Marie Kearns	Individual
<u>SD-C367-226</u>	Olga Delgetty	Individual
<u>SD-C367-227</u>	Tania Daly	Individual
<u>SD-C367-228</u>	Casey Family	Individuals
<u>SD-C367-229</u>	Collins Family	Individuals
<u>SD-C367-230</u>	Halpin Family	Individuals
<u>SD-C367-231</u>	Keogh Family	Individuals
<u>SD-C367-232</u>	Sullivan Family	Individuals
<u>SD-C367-233</u>	Helen Spall	Individuals
<u>SD-C367-234</u>	Lisa O' Neill	Individuals
<u>SD-C367-235</u>	Floraville Residents	Residents Petition

2.0 Summaries, Responses and Recommendations to Issues Raised in Submissions

Section 13 (4) (b) of the Planning and Development Act 2000 (as amended) requires the Chief Executive's Report to make a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator, and the issues raised and recommendations of the NTA and the relevant Regional Authority outlining the recommendations of the Chief Executive in response.

In view of these specific requirements, the submissions and observations of the Office of the Planning Regulator, the National Transport Authority and the Eastern and Midland Regional Assembly are identified separately below, summarised and responded to.

2.1 Observations, Submission and Recommendations from the Office of the Planning Regulator (OPR) - Submission SD-C367-154

Summary of Submission

The Office of the Planning Regulator (the Office) has outlined their functions in relation to the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office outlines the difference between their Recommendations, which relate to clear breaches of the relevant legislative or policy provisions and their Observations, which take the form of a request for further information or clarification.

The Office acknowledges and welcomes the overall approach of the authority in the preparation of the proposed Variation, notably with regard to:

- Addressing the National Planning Framework First Revision (2025) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly area.
- The policy approach to supporting Clondalkin's role in Dublin City and Suburbs and the Metropolitan Area Strategic Plan (MASP) and the support of the role of Clondalkin as a Decarbonising Zone and the wider approach to climate action.
- The clear and detailed development planning framework for the development of the area over the lifetime of the plan, notably the Urban Design Strategy and the detailed Frameworks and Opportunity Sites, which include the Large Scale Framework and the Ninth Lock Road Framework Site, noting this will be one of the key sites for housing delivery at scale in the Clondalkin area.
- The emphasis on the 10-minute neighbourhood concept and the supporting measures proposed such as, improvements to sustainable transport, permeability, public realm, housing provision and the enhancement of social and community infrastructure to implement this concept.
- Strongly commends the significant efforts made in the preparation of the Local Transport Plan (LTP) in conjunction with the NTA and Transport Infrastructure Ireland.

- The overall recognition that green infrastructure along with compact growth, sustainable travel, flood management and efficient use of land and associated infrastructure are essential components towards achievement of necessary climate action measures. The submission indicates the appropriateness that green infrastructure features across many chapters and sections of the plan.

The Office considered the proposed Variation to be generally consistent with key policies, guidelines and legislative provisions, as summarised below:

Area	Comment
Consistency with the Regional, Spatial and Economic Strategy	The Office considers the proposed Variation to be generally consistent with the regional policy objectives of the RSES
Consistency with Development Plan (2022-2028) and core strategy	The Office is satisfied that the proposed Variation is generally consistent with the County Development Plan, including its core strategy
Compact growth, zoning and infrastructural services	The Office is satisfied that there are sufficient infrastructural services in the area to cater for the projected growth of the LPF area
Sustainable movement	The Office welcomes and commends the approach set out for Sustainable movement. The clear evidence base for policies and objectives through the work undertaken in the preparation of the LTP is noted. The Office commends the inclusion of the proposed mobility measures to provide safe and convenient routes for children to cycle or walk to school. The objectives for public consultation with the community at an individual project level are welcomed.
Environment, natural and built heritage	The Office welcomes the approach of the Climate Action and Infrastructure chapter whereby the theme of climate action is integrated into all the themes of the LPF and notes the alignment with the key action areas of the South Dublin Climate Action Plan 2024-2029. Policies and objectives in relation to chapter 4 Green Infrastructure and the approach being taken to developing a

	multifunctional green infrastructure network, including the presentation of Gaps and Opportunities and stepping stones is welcomed. The ambitious objective to deculvert the Camac is noted. Policies and objectives in the LPF for the protection and conservation of the built and cultural heritage of the plan area are welcomed.
Urban Design and Large Scale Development Frameworks	The Office welcomes the inclusion of chapter 8 Urban Design Strategy and its policies and objectives relating to Frameworks and Opportunity Sites, as well as Urban Design Principles for the Village Centre Framework Area and the Village Enhancement Schemes (VES). The challenges around the Knockmeenagh Framework Site are noted and the Office has indicated that the site has potential to provide for housing at appropriate locations within this landbank and encourages the Planning Authority to bring forward its plans in this regard.
Implementation and monitoring	The inclusion of chapter 9 Implementation and Monitoring as part of the LPF which sets out the implementation and phasing / timelines of relevant objectives and details are welcomed noting the provision of an effective monitoring and evaluation system and funding streams.

OPR Recommendations

The Council notes and welcomes that the Office of the Planning Regulator (OPR) made no recommendations on the Local Planning Framework (LPF) for Clondalkin, and it therefore considered that the LPF is generally consistent with relevant policy and legislative provisions.

OPR Observations

Notwithstanding the above, the submission includes one (1) observation for the LPF, which the OPR has indicated requires further consideration.

Flood Risk Management

Observation 1, in summary, relates to Flood Risk Management, and in particular, the OPR states that ‘the Planning Authority should consider including the present-day flood risk mapping for Clondalkin to demonstrate the current predicted flood risk’. The full observation is as follows:

Observation 1 – Flood Risk Management

Having regard to flood risk management, and in particular, the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and the recently published LAWPRO’s planning guidance on Implementation of Urban Nature-based Solutions, Guidance Document for Planners, Developers and Developer Agents (2025), the Planning Authority is advised to:

- Review opportunity sites with the Local Planning Framework area in the context of SuDS, 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; and
- Include the present-day flood risk mapping for Clondalkin as a distinct layer within the Strategic Flood Risk Assessment to demonstrate the current predicted flood risk.

The Planning Authority is advised to consult with the Office of Public Works regarding this recommendation.

CE Response:

The observation raised relating to Flood Risk Management is noted. It is also noted that similar issues were raised by the OPW in their submission to the proposed Variation (Draft LPF). On foot of the OPR observation and the OPW submission, the Council and their flood risk consultants have engaged further with the OPW and have agreed an approach to respond to the issue of representing the present day flood risk mapping within the SFRA. In this regard, the SFRA will be revised to include present day flood risk mapping in addition to the mapping already shown which integrates the high-end climate change scenario.

On the matter of SuDS both the LPF in Chapters 3 and 4, and the County Development Plan 2022-2028 (CDP) include a number of objectives which relate to the need to integrate surface water drainage within proposed development alongside green infrastructure and the achievement of a Green Space Factor (GSF). The relevant objectives (GI4 Objective 1 and 2 of the CDP) are included in the draft SFRA within Appendix A – Justification Tests. Any development coming forward within Clondalkin will have to demonstrate how it proposes to implement SuDS, required to be designed in accordance with SDCC’s Sustainable Drainage Explanatory, Design and Evaluation Guide 2022 and the GSF. In addition to being required by way of objectives in chapters 3 and 4 of the LPF, this requirement is included in the Development Parameters for the Ninth Lock Framework site,

the Village Centre Framework area and within objectives for the Village Enhancement Schemes in Chapter 8.

However, noting both SDCC's SuDS Design and Evaluation Guide and the more recent SuDS guidance by LAWPRO 'Implementation of Urban Nature-based Solutions Guidance Document for Planners, Developers and Developer Agents' it is considered appropriate that the SFRA should include a 'Stormwater Management' section within the Justification tests for the opportunity sites set out in Appendix A of the SFRA. This new stormwater management section will outline 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.

CE Recommendations:

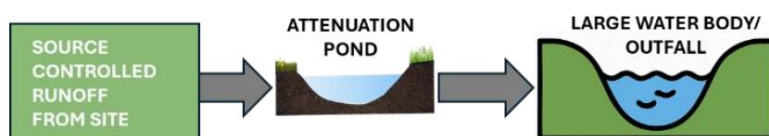
To amend the draft SFRA to include present day flood risk mapping as a distinct layer within the document; and

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:

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-by-site 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.'

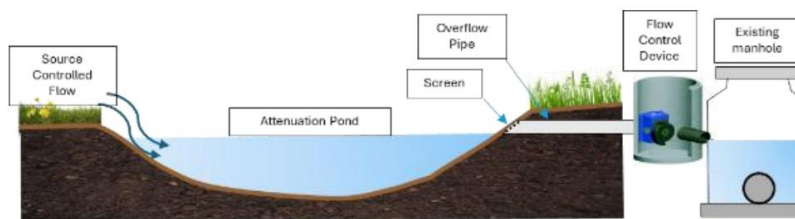
And add the following image in the 'Stormwater Management' section in A1.1:



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.'

2.2 Issues Raised and Recommendations from the National Transport Authority (NTA) - Submission SD-C367-136

Summary of Submission

The NTA welcomes the opportunity to comment on draft Clondalkin Local Planning Framework (LPF) and the associated documents including the Draft Local Transport Plan (the LTP) and the work undertaken on an Area Based Transport Assessment (ABTA) which resulted in the LTP. They indicate that their comments are based on prevailing national policy and the Greater Dublin Area Transport Strategy (the Transport Strategy) and implementation at the local level in Clondalkin.

Chapter 5 – Sustainable Movement Summary

The NTA acknowledge the level of engagement throughout the process with SDCC and its consultants throughout all stages of the ABTA process and is of the view the draft Local Transport Plan (LTP) 'provides a robust basis for transport-and movement-related objectives' for the draft Local Planning Framework (LPF). In particular, the NTA notes that the level of detail from the LTP and the manner of commitment to the LTPs findings is welcomed.

Transport Objectives

The NTA is supportive of the proposed Objectives of the Draft LTP which emphasise providing for walking, cycling and public transport, and reducing unnecessary vehicular movements through the town. It is indicated that this is reflective of regional and national transport policy and investment priorities (in particular NIFTI, National Sustainable Mobility Plan and the Climate Action Plan). The NTA notes and supports the reiteration of these Objectives within the Draft LPF which have been used to inform more detailed LPF Policies and Objectives.

Particularly the NTA 'supports the inclusion of the proposed measures maps from the LTP within the LPF, the inclusion of specific Objectives (SM1:1, SM2:2, SM3:2, SM4:1) committing to the development and implementation of the measures, and the clear prioritisation of measures. It is considered that this approach could help facilitate a shift towards sustainable transport within Clondalkin'.

Roads

The NTA notes that the LPF area is in the vicinity of Junction 9 of the M50 and of the Luas Red Cow Interchange.

It is recommended that reference to this is included in Chapter 5 and that official national road policy as contained in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012,) is also appropriately referenced.

Supporting Objectives

The NTA supports objective SM11 Objective 5 which states:

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.

However, the NTA is of the view that it could be further strengthened to include a commitment to assess the effect of implementation against the LTP Objectives. The NTA considers that this would capture a wider range of impacts/effects than those currently referred to in SM11:5.

NTA recommendations for Chapter 5

- The Section on '*Roads, Traffic and Junction Management*' should include reference to the relationship between the plan area and the national road network and to official national roads policy.
- SM11:5 should be amended to provide for an assessment of the effect of implementation of the LTP measures against the Objectives of the LTP.

CE Response to Chapter 5

In relation to the recommendations under 'Roads' Chapter 5 of the LPF, under section 5.2 Policy Context, contains a section on the *Spatial Planning and National Roads Guidelines for Planning Authorities 2012*. The corresponding text indicates that 'due to the proximity of strategic transport infrastructure (M50, N7) to the LPF boundary, the LPF has regard to

these guidelines.’ However, it is considered that this can be further strengthened by inclusion of the guidelines in SM9 Objective 1.

In relation to SM11 Objective 5, the recommendation is reasonable and would align with a further recommendation of the NTA in relation to Chapter 9 of the LPF. It is considered that the objective should be amended to reflect the need to assess the effect of implementation of the LTP measures against the LTP objectives.

CE Recommendations to Chapter 5

Amend SM9 Objective 1 to make reference to the *Spatial Planning and National Roads Guidelines for Planning Authorities 2012* to read from:

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

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***

And

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.

Chapter 8 – Urban Design Strategy Summary

The NTA welcomes the identification of how the framework, opportunity sites and mini-development areas will connect to the wider plan area in a sustainable way.

The emphasis on planning for sustainable modes in the new development areas and in maximising opportunities for walking and cycling in existing areas through Village Enhancement Schemes is supported.

While commending the way in which the Draft LTP has been incorporated into the substance of this chapter, the NTA have made two recommendations in the interests of clarity. These are:

Recommendations for Chapter 8 Urban Design Strategy

- Include a clear statement underlining that the principles and Objectives in Chapter 8 that relate to transport and connectivity align with the Objectives and Measures set out in the Draft LTP and Chapter 5 of the LPF.
- Include a commitment to the principle of filtered permeability for new development areas, whereby through traffic by private car is discouraged and permeability for pedestrians and cyclists provided, as stated in Section 8.8 of the Transport Strategy

CE Response to Chapter 8

The Authority's recommendation in relation a statement that the principles and objectives on transport and connectivity in Chapter 8 align with the objectives and measures set out in the Draft LTP and Chapter 5 of the LPF is noted.

It is considered that the alignment of movement and urban design is made clear in the Urban Design Chapter 8 of the LPF where in section 8.2 of Chapter 8, Integrated Design Approach it is stated:

Movement

Urban structure is built around movement and safe and convenient active travel routes are critical to this. Streets and public spaces are where public life takes place and opportunities to improve these spaces and create new ones are explored building on objectives in Chapter 5.

However, in response to the NTA recommendations, it is considered reasonable to further make clear that the principles and objectives on transport and connectivity in Chapter 8 align with the objectives and measures set out in the Draft LTP and Chapter 5 of the LPF through an amendment to this section.

In relation to the recommendation on filtered permeability for new development areas, this is considered appropriate and can be incorporated as an objective into Chapter 5 as new objective SM1 Objective 6.

CE Recommendations for Chapter 8

To amend section 8.2 Integrated Design Approach of Chapter 8 under the subsection titled 'Movement' as follows:

*Urban structure is built around movement and safe and convenient active travel routes are critical to this. Streets and public spaces are where public life takes place and opportunities to improve these spaces and create new ones are explored, building on objectives in Chapter 5. **Furthermore, this chapter aligns with the objectives and measures set out in the LTP and Chapter 5 of the LPF.***

And

Amend Chapter 5 of the LPF to add new objective SM1 Objective 6 relating to ‘Filtered Permeability’ as follows:

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.

Chapter 9 - Implementation and Monitoring Summary

The NTA welcomes the inclusion of a separate chapter dealing with implementation, evaluation and monitoring. Regarding ‘Sustainable Movement’ in Table 9.1 of the chapter, the NTA is of the view that critical to this is the implementation of the Measures set out in the LTP.

The NTA recommends that the ‘*Implementation*’ Column in Table 9.1 should include specific reference to the LTP and the measures set out within it.

CE Response to Chapter 9

South Dublin notes the recommendation of the NTA with regard to the insertion of LPT measures within Table 9.1 of the Implementation and Monitoring Chapter. It is considered that reference to the LPT measures would be appropriate in the table. It is considered it would be appropriate that the measures should be read holistically in conjunction with Chapter 5 and associated objectives of the LPF.

CE Recommendation for Chapter 9

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.

2.3 Observations, Submission and Recommendations from the Eastern and Midlands Regional Assembly (EMRA) – Submission SD-C367-20

Summary

The submission notes the Eastern and Midland Regional assembly’s role and function under the provisions of the Planning and Development Acts. The submission contains the opinion of EMRA as to whether the proposed variation is consistent with the Regional Spatial & Economic Strategy, along with recommendations as required under Section 27C of the Planning and Development Act 2000 (as amended).

The submission outlines the overall vision and statutory objective of the RSES by supporting the implementation of the NPF and aligning with the National Development Plan (and thus Project Ireland 2040). The spatial strategy provides a framework for future growth of the region. The planning authority should ensure (as per the provisions of the Planning and Development Act 2000, as amended) that the variation is consistent with the

RSES, thus ensuring alignment across local, regional, and national planning policy. The submission welcomes the proposed Variation to the Development Plan.

The submission considers that the Draft LPF is generally consistent with the RSES.

The submission welcomes the reference that Clondalkin forms part of the Metropolitan Area Strategic Plan (MASP). This aligns with section 5.3 of the RSES which sets out Guiding Principles for the growth of the Dublin Metropolitan Area.

The submission considers this variation to be consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031.

Chapter 2: Vision and Strategic Objectives

The submission is satisfied that the LPF aligns with the Core Strategy of the South Dublin County Council County Development Plan 2022-2028.

The submission welcomes the strategic objectives and considers the plan preparation to be comprehensive. The structure and content of the plan is in accordance with Local Area Plan Guidelines for Planning Authorities 2013 and the Development Plans Guidelines for Planning Authorities 2022 (where relevant).

Chapter 3: Climate Action and Infrastructure

The submission welcomes policy CA2 Objective 2 which seeks to achieve DZ carbon emissions as set out in the South Dublin County Council Climate Action Plan 2024 – 2029. The submission identifies the Regional Development Monitor which contains environmental indicators which may be of relevance to the LPF.

The submission notes that the council works in partnership with Uisce Éireann to ensure sufficient water supply and wastewater infrastructure to allow for sustainable growth.

The submission supports the policy approach to flood and water resource resilience and natural flood risk mitigation through the use of green infrastructure and nature-based solutions.

Chapter 4: Green Infrastructure

The submission welcomes this chapter and the recognition that parks and open space improve people's quality of life.

The submission supports the protection and enhancement of Green Infrastructure corridors. This aligns with RSES RPO's 5.7 and 5.8 which seeks to strengthen strategic GI connections and promote greenways with key cycling infrastructure.

The submission supports the County GI Strategy which informed the development of the Draft LPF. The submission particularly welcomes Policies GI2 and GI3. These policies attempt to identify gaps in the existing GI network, strengthen green linkages and establish new connections.

This chapter could be strengthened by referencing the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES. This section outlines the need to identify and protect existing Green Infrastructure assets; the

importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

The submission points out that there is range of resources developed by the assembly that support the implementation of objectives for ecosystem services and green infrastructure which may be of assistance in balancing environmental sensitivity with development. These include a mapping methodology, policy briefs, good practice handbooks and infographics.

Chapter 5: Sustainable Movement

The submission notes that the Local Transport Plan in conjunction with an Area Based Transport Assessment aligns with Section 8.3 of the RSES and RPO 8.6 that there is a requirement to prepare a Local Transport Plan which should include transport priorities such as public transport infrastructure and services, cycle investment, improvements to the pedestrian environment and road enhancements.

The submission commends the identifying of priority, secondary, and strategic permeability routes. In particular, the submission welcomes Policy Objectives SM4 to SM5.

The submission supports improving permeability and is fully consistent with the RSES's Guiding Principles for the Integration of Land Use and Transport and aligns with the 10-minute settlement concept and healthy, vibrant place-making. The submission directs the Council's attention to the Sustainable Mobility Academy which is a repository of knowledge, showcasing case studies, project outcomes, and ongoing advancements for active travel and sustainable mobility.

The submission supports development of BusConnects and the enhancement of rail and light rail services in Clondalkin which aligns with RPO 5.2 and 5.3 of the RSES.

Chapter 6: Community, Homes and Employment

The submission welcomes the reference to Policy QDP5 of the South Dublin County Council County Development Plan 2022-2028 which promotes the achievement of 10-minute settlement. This concept is also included as a guiding principle in the RSES. The submission points out the assemblies 15-minute city pathway document which includes identifying public policy support, ongoing actions, good practice examples, and funding opportunities to support '15-minute city' and '10 Minute Town' concepts.

The submission welcomes residential tenure and density objectives in the LPF. These objectives contribute to the promotion of 'Healthy Placemaking,' which is a cross-cutting principles of the RSES and aligns with RPOs 9.10, 9.11, 9.12, 9.13, 5.4, 5.5 and Figure 9.2. The submission notes the LPF promotes inclusive, accessible design and states the importance of providing educational facilities. This further aligns with RPOS 9.12 and 9.13 and it supports the broader objectives of Regional Strategic Outcome 13 of the RSES - 'Improve Education Skills and Social Inclusion'.

The submission supports Clondalkin's role in supporting a strong and diverse economic base in South Dublin County.

Chapter 7: Conservation and Built Heritage

The submission supports policies and objectives set out in the Draft LPF to safeguard the architectural and archaeological heritage. This aligns with RPO 9.30 and Section 9.7 of the RSES.

The submission welcomes the inclusion of CBH2 Objective 1, CBH2 Objective 2 and CBH2 Objective 5 in the LPF which helps to manage the integration of the new development within the ACA. This aligns with the broader objectives of the Regional Strategic Outcomes (RSO) of the RSES, particularly RSO 5 which seeks to enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration.

Chapter 8: Urban Design Strategy

The submission welcomes this chapter and supports the placemaking-led approach to future development in Clondalkin as it aligns with the core principles of healthy placemaking.

The submission supports the inclusion of large-scale development sites, Mini-Frameworks, Village Enhancement Schemes and opportunity sites which will all help guide future development in a coordinated, sustainable manner.

This chapter aligns with the RPO's 9.7, 9.8, 9.9 and the submission welcomes measures for urban regeneration and public realm improvement measures that enhance the economic and tourism potential of Clondalkin.

Chapter 9: Implementation and Monitoring

The submission welcomes the monitoring system in this chapter to ensure that progress on key objectives in the Plan is evaluated.

The submission draws attention to the Regional Development Monitor which provides mapping and visualisation infrastructures which contribute to gaining a greater insight into social, economic and environmental trends to aid better monitoring and decision making.

Environmental Reports

The submission notes that the Variation underwent screening for SEA and AA. The submission suggests that the SEA screening concluded that a Strategic Environmental Assessment was not required. The submission notes that AA screening concluded that it is not necessary to undertake any further stages of the Appropriate Assessment process.

CE Response to EMRA Submission:

The contents of the submission are noted and welcomed.

The comments regarding the strengthening of Chapter 4 by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES and the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment is noted. However, it is considered that the whole focus of

Chapter 4 is on identifying and protecting the GI assets and various considerations outlined. This is evident in the objectives related to gaps and opportunities, the green links and their enhancement and further supported in the Urban Design Strategy through the individual design parameters for the Framework and Opportunity sites.

Where appropriate, the council will utilise the Regional Development Monitor to enhance understanding of key societal trends and patterns and to aid better monitoring and decision making.

It should be noted that the SEA screening concluded that SEA was required and an Environmental Report (SEA) accompanied the proposed Variation on public display.

CE Recommendation:

No change to the Draft LPF.

2.4 All Other Submissions

Section 13 (4)(b) of the Planning and Development Act 2000 (as amended) also requires the Chief Executive's Report to provide a summary of the submissions and observations made by any other persons, giving a response to the issues raised taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government. This is provided for further below.

It is noted that no submissions were received which required a response in Chapter 1: Introduction and Context.

Chapter 2: Vision and Strategic Objectives

Vision and Strategic Objectives		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	Vision and Strategic Objectives The submission welcomes the LPF and the emphasis on heritage in the vision and in the strategic objectives. The submission commends the inclusion of the second strategic objective which relates to the appropriate re-use of heritage assets and ensures new developments respond sensitively to such assets. The submission recommends the following additions to the strategic objectives (in bold): <i>-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.</i> <i>-Ensure that areas of concentrated new growth are well connected to the town 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.</i> <i>-Protect biodiversity, while strengthening and expanding the existing green infrastructure, as the</i>	CE Response: The content of the submission is noted. There are eight strategic objectives set out in the Draft LPF. The submission suggests amendments to three of them. The proposed amendments as requested are considered to positively strengthen the strategic objectives. In addition to the amendments put forward in the submission, it is recommended that the word 'town' is replaced by the word 'village' to retain consistency in the description of Clondalkin as a village throughout the LPF. CE Recommendation: Amend strategic objectives on page 3, in Section 2.5 on page 14 and in Table 9.1 on pages 112 and 113: So that the first Strategic Objective is amended from: <i>'Promote good urban design and healthy placemaking to create a strong sense of place and to build positively on Clondalkin's rich identity.'</i> To the following wording

	<i>foundation of a green and blue infrastructure network in the village and surrounding areas.</i> The submission indicates that for the last recommendation, it is important to explicitly mention biodiversity, as it may be overlooked under general green infrastructure aspirations.	<i>'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'.</i> And the fourth Strategic Objective from: <i>'Ensure that areas of concentrated new growth are well connected to the town centre, and to the surrounding areas, ensuring the necessary infrastructure is provided as required, adding to the vitality of the town.'</i> To the following wording <i>'Ensure that areas of concentrated new growth are well connected to the 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 village.'</i> And the sixth Strategic Objective from: <i>'Strengthen and expand the existing green infrastructure, as the foundation of a green and blue infrastructure network in the village and surrounding areas.'</i> To the following wording <i>'Protect biodiversity, while strengthening and expanding the existing green infrastructure, as the foundation of a green and blue infrastructure network in the village and surrounding areas.'</i> CE Recommendation:
--	---	--

		No change to Draft LPF.
SD-C367-159 Monica McGill	Vision and Strategic Objectives The submission hopes that the council will receive funding from the Government and take proactive steps to implement the Strategic Objectives outlined in the LPF: - "...create a strong sense of place and build positively on Clondalkin's rich identity" - "Recognise the cultural, historic and economic value of the heritage assets of Clondalkin, promoting their appropriate re-use where underutilised and ensuring that new development responds sensitively to all such assets." - "Promote and enhance a diverse and resilient local economy, building on the vibrancy that currently exists."	CE Response The contents of the submission are acknowledged and recognised. Every effort will be made to maximise the benefits of any funding allocation to Clondalkin Village to ensure delivery of the Strategic Objectives of the LPF. This is supported by the objectives within the different chapters of the LPF. CE Recommendation: No change to Draft LPF.
SD-C367-72 Land Development Agency	Vision and Strategic Objectives The LDA support the vision and associated strategic objectives of the LPF, which aligns with the LDA's core mandate to deliver sustainable residential communities. The LDA welcomes the opportunity to work with SDCC in delivering on these shared goals in the future.	CE Response: The content of the submission is noted. CE Recommendation: No change to Draft LPF.

General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	General The submission from the Heritage Council outlines its role as a statutory body under the Heritage Act 1995. The Heritage Council seeks to provide submissions on forward planning, development management and strategic infrastructure as they relate to Ireland's heritage. A list of national policies is included in the submission to provide context to the comments. One of which is the importance of National Planning Framework April 2025 with 'Enhanced Amenity and Heritage' being a national strategic outcome reflecting that built, cultural and natural heritage has an intrinsic value in defining characters of urban and rural areas. Similarly, the NPF 2025 has other national policy objectives that relate to landscape, cultural and natural heritage. The submission also references the National Biodiversity Action Plan 2023-2030 and notes the important role local authorities have in biodiversity conservation through the planning system. In addition, the Heritage Council identifies specific outcomes and actions from the NBAP which are relevant to the plan including Outcome 2A and 3C, and Actions 3C2, 3C3, 1B9 and 1C5. Furthermore, the submission highlights key actions from Heritage Ireland 2030 that should be	CE Response: The content of the submission is noted. In section 1.4 of chapter one, the policy context of the LPF is stated. Comments in relation to the policy documents are welcomed. The LPF has sought, through both the different strategic objectives and the objectives within the different chapters, to respond positively to the policies identified. CE Recommendation: No change to Draft LPF.

	included in the plan including Action 22, 26 and 37. The Guidelines for Planning Authorities on Architectural Heritage Protection 2004 is also highlighted as a key document in relation to built heritage with Chapters 2 and 3 of particular importance, while the OPR guidance on Archaeology in the Planning Process (leaflet 13) should also be taken into consideration in this plan	
--	---	--

Chapter 3: Climate Action and Infrastructure

Decarbonisation Zone		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-3 Martin Kavanagh	Decarbonisation Zone The submission questions the viability of achieving the 'Decarbonisation Zone' target of reducing carbon emissions by 51% given that the majority of emissions are primarily driven by transport and residential/commercial sectors. Regarding transport emissions, the plan appears to heavily rely on the public to make the switch to Electric Vehicles (EV's), which is expensive and does not reduce the volume of vehicles on the road. The objective (CA6 Obj2) to deploy public EV charging hubs at key transport nodes is seen as premature without the demand for them and will only benefit individuals who are unable to charge their EV at home. Regarding residential emissions, the majority of housing stock requires retrofitting works to reduce emissions and is considered expensive to implement regardless of the current SEAI grants and they will potentially decrease each consecutive year. Considering the current cost of living for majority of people, this is non-viable.	CE Response: The content of the submission is noted. The development of a Decarbonisation Zone (DZ) in Clondalkin was introduced as part of Ireland's National Climate Action Plan (CAP) 2019 Action 165 and the 2024 CAP action LG/24/2. SDCC selected Clondalkin as a participant in the DZ programme as it was considered to be ready to support climate action, to have a strong sense of community and to be the right size in terms of population. Reflecting the approach of the CDP, the theme of Climate Action is integrated into all themes of the LPF, with policies and objectives which will contribute towards addressing climate change and reducing the County's carbon emissions in a meaningful and tangible way. It is recognised that the achievement of the targets will be a challenge. The provisions of the Draft LPF are seeking to facilitate the actions set out in the South Dublin Climate Action Plan 2024, one of which is the Clondalkin Decarbonisation Zone (DZ), through compact growth, sustainable travel and utilising natural systems towards flooding and surface water management (ecosystems approach).

	Factoring the above, there is no real holistic plan to reach this reduction in emissions by 51% in the next 5 years.	CE Recommendation: No change to Draft LPF.
SD-C367-95 The Heritage Council	Decarbonisation Zone The submission strongly supports the Clondalkin Decarbonisation Zone and policies relating to compact growth. The submission encourages forward plans to exhaust the potential of brownfield sites before any greenfield expansion is pursued. If greenfield sites are pursued it is essential to have a mix of homes with high densities and facilities which conducive to sustainable transportation. However, DZ policies are high level, and the submission recommends including policies such as: -Policy provision for the relaxation of car parking standards. -Proactive and positive solutions for public realm, traffic management and green spaces.	CE Response: The content of the submission is noted and welcomed. The LPF promotes compact growth and is required to implement the section 28 guidelines on Sustainable Communities and Compact Growth and apply the relevant densities. The LPF is supporting the actions in the Climate Action Plan but it is noted that the Decarbonisation Zone action is still at a high level and the Climate Action Team is progressing the action separately with the community. The County Development Plan includes policies relating to maximum car parking standards, reducing the maximum in areas close to public transport. The relevant standards will continue to apply in the LPF area. The LPF has also put forward a transport strategy, supported by the Local Transport Plan. This strategy has emphasised the importance of facilitating active travel and public transport to help achieve climate targets. The two village enhancement schemes in Chapter 8 of the LPF will help to improve public realm, traffic management and greening of the village.

		CE Recommendation: No change to Draft LPF.
SD-C367-191 Jamie Thompson	Decarbonisation Zone It is outlined that there are opportunities missed to strive to Decarbonisation Zone targets and protect biodiversity and greenspace. Additional efforts are needed to safeguard the community for the benefit of future generations given the high demands being placed on the local area. Otherwise, it would appear that the Clondalkin DZ is merely a PR stunt. Measures are suggested to support the local environment and the Decarbonisation Zone including: - Lobby the national government to increase residential solar panel grants - Additional tree planting (including fruit trees) in south-eastern corner of Riversdale Estate - Protection of the greenery, native species and biodiversity The submission outlines examples of a lack of adequate planning and failure to apply environmental obligations including: - The council has missed the opportunity to implement district heating at recent data centre developments in Grange Castle	CE Response: The content of this submission is noted. The Draft LPF is facilitating the support of the Clondalkin Decarbonisation Zone (DZ). However, the DZ is an action arising out of South Dublin's Climate Action Plan and is being progressed separately from the LPF. The DZ implementation Plan is awaiting completion and will include additional projects and initiatives which deal directly with decarbonising within the DZ area which extends beyond the Clondalkin LPF area. In response to the measures suggested to support the local environment and the DZ zone. The LPF is a policy document and has no remit in relation to lobbying for grant approval. The LPF includes a detailed GI chapter and strategy identifying opportunities for green infrastructure including more tree planting generally and increasing biodiversity. It is noted also that the Public Realm Department of the Council advises that additional planting will be carried out in Riversdale during the 2025-2026 planting season. The submission points to examples highlighting lack of adequate planning and failure to apply environmental obligations, SDCC continues to apply relevant National and Regional policy measures which support the protection of the county's wider environment

	- Solar panels have not been implemented on buildings in Grange Castle - The new construction near Takeda and Grifols sites in Grange Castle releases red-brown smoke during August and September 2025 without enforced cessation, monitoring or assessment - Data centres have been generating CO2 and visible particulate matter (black smoke) pollution in Grange Castle	Any data centre planning applications received within SDCC are rigorously reviewed under national, regional and local planning policy objectives, including the potential for future provision of district heating and the provision of onsite renewable. The LPF includes policy in the form of CA5 Objectives 1 and 2 to support district heating and engagement with potential district heating providers. While there is policy to promote the use of solar panels, they are not always compatible with the type of buildings required for certain industrial uses. Any queries in relation to smoke / particulate matter should be reported to SDCC's Environment Section so these can be investigated. Matters in relation to Data Centres located outside the boundary of the Draft LPF are outside the remit of the Plan. It is noted also that the LPF is a policy document and has no remit in relation to lobbying for grant approval. CE Recommendation: No change to Draft LPF.
SD-C367-179 Margueritte Sherry	Decarbonisation Zone The submission states that data centres should be decarbonised, which would remove the onus off the individual.	CE Response: The content of the submission is noted. Decarbonisation requires a multifaceted approach involving individuals, public bodies and the private industry, in order to reduce our climate impact and obtain our Climate Action goals. It is noted that there are no data centres currently located within the LPF area.

		CE Recommendation: No change to Draft LPF.
SD-C367-160 Patrick Duffy	Decarbonisation Zone The submission states that the council is approving planning for residential units and nursing homes right in the centre of the village on every empty patch of land and this will lead to an increase in people and vehicles. At the same time the council is trying to reduce motor traffic in the village by narrowing junctions and roads. This is poor management. The car is hugely important, and most vehicles will be electric within the next 10 years. The council should provide better grants for businesses in the area to utilise solar energy as this will yield better results for the environment rather than narrowing of roads and junctions.	CE Response: The content of this submission is noted. The Draft LPF does not propose changes to traffic access to the village maintaining access within and to the village core, while also trying to deter through traffic that contributes to congestion and emissions within the Plan area. Climate action can promote the reduction in car-based transport to help reduce congestion, where feasible, thus facilitating active travel and public transport efficiency, facilitating a reduction in emissions, creating a safer and more pleasant environment and improving options for healthy activity. Development within established urban cores allows people to live closer to the facilities and supports they need and makes improved public transport options more viable. Grants for solar and other renewable alternatives are available through the SEAI. CE Recommendation: No change to Draft LPF.

Energy Efficiency in Buildings		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-72 Land Development Agency	Energy Efficiency in Buildings The LDA commend the promotion of Clondalkin as a Decarbonizing Zone, with supporting objectives regarding renewable energy implementation and retrofit, as well as district heating, along with CA3 Objectives 1 and 2. An additional objective which promotes energy efficiency in new development would ensure new buildings are built to the highest standards, acknowledging the current building regulations do set standards but planning policy in support aimed at targeting the delivery of highly efficient new buildings would be appropriate.	CE Response: The content of this submission is noted and welcomed. CA 3 Objective 1 states as follows: <i>‘Prioritise, in line with RPO 7.40 and CDP Policy E3, the retrofitting and refurbishment of buildings over demolition and reconstruction where possible to reduce the large quantities of embodied carbon energy generated from building materials.’</i> CA3 Objective 2 states as follows: <i>‘Promote the retrofitting of buildings, through the Climate Action Team in partnership with local businesses and community groups, with the aim of delivering and improving energy efficiency and building climate resilience within Clondalkin.’</i> As a strategic county wide policy document, the County Development Plan provides a range of objectives within Chapter 10: Energy which support the building regulations in the promotion of Energy Efficient buildings. The provisions of the following objectives of the CDP are relevant: E3 Objective 1 states as follows:

		<i>'To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings, and other buildings through the design and location of new development, in accordance with relevant building regulations and national policy and guidance.'</i> E3 Objective 3 states as follows: <i>'To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.'</i> The building regulations are separate to the planning legislation and the LPF has no remit in relation to the inclusion of any objectives relating to these regulations. It is considered that the provisions of the CDP provide adequate support and no new policies are required. CE Recommendation: No change to Draft LPF.
--	--	--

Renewable Energy		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-145 Red Network	Renewable Energy The submission welcomes the renewable energy objectives (CA4). This could be strengthened through enhanced funding. An objective should be added to outline how district heating can be achieved, particularly at the Ninth Lock Framework site.	CE Response: The content of this submission is noted and welcomed. Chapter 9 Implementation and Monitoring Funding section highlights funding mechanisms which will provide support in achieving the Decarbonisation Zone. On the matter of district heating, relevant objectives are already included in the LPF in Chapter 3, section 3.2.4 under the heading District Heating as follows: CA5 Objective 1: <i>‘Explore opportunities for Clondalkin to create a sustainable district heating network which can provide heat to local homes and businesses, as well as provide opportunities in SDCC owned buildings and / or framework sites.’</i> CA5 Objective 2: <i>‘Promote engagement with potential district heating providers in the area and developers with a view to investigating the use of district heating for new development on the 9th Lock Road framework site and/or other sites where feasible.’</i>

		Having regard to the existing objectives in the Draft LPF it is considered that there is no requirement for the proposed additional objective. CE Recommendation: No change to Draft LPF.
--	--	---

Decarbonising Transport		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-57 Cllr Francis Timmons	Decarbonising Transport The submission states that CA6 Obj 2 EV of the LPF should make clear how households can install EV charging. The submission also states that an objective should be inserted to promote household EV chargers.	CE Response: The content of the submission is noted. CA6 Objective 2 deals with public EV charging hubs and states as follows; <i>‘Deploy public EV charging hubs within Clondalkin LPF at key transport nodes, as part of the Dublin Local Authority Electric Vehicle Charging Strategy.’</i> Section 12.7.5 Car Parking / charging for Electric Vehicles (EVs) and Policies E4 and SM7 of the County Development Plan 2022-2028 provide objectives and parameters for the provision and location of EV charging infrastructure across the county. It is also notable that there are grants and information available through SEAI which support individual householders who wish to install EV charging infrastructure. CE Recommendation:

		No change to Draft LPF.
SD-C367-146 Victor Madden	Decarbonising Transport The submission states that the council should be less worried regarding transport emissions due to growing shift towards electric vehicles and instead the increase in air traffic in Fingal is more of a concern.	CE Response: The content of this submission is noted. The growing shift towards EV's and the reduction in carbon emissions which will emerge from this is noted. Reducing congestion in our urban areas regardless of EV uptake will also reduce carbon emissions and improve safety for all road users. Air traffic emissions is outside the scope of the Draft LPF. CE Recommendation: No change to Draft LPF.

Infrastructure		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-81 Irish Water SD-C367-189 Cllr Trevor Gilligan PC	Water Supply and Wastewater UÉ welcome the inclusion of objective CA7 Objective 1 and 2 (Water Supply and Wastewater). One submission asks if water and drainage impact are included in the LPF?	CE Response: The Uisce Éireann submission is welcomed and acknowledged. Water and drainage impact are dealt within the Strategic Flood Risk Assessment (SFRA) which was completed as part of the LPF and which has informed objectives on flooding within the LPF. Furthermore, Section 3.3 Infrastructure of Chapter 3, Climate Action and Infrastructure includes objectives related to surface water, the separation of foul and surface water drainage systems and incorporating

		climate change impacts into drainage and surface water design. CE Recommendation: No changes to the Draft LPF.
SD-C367-81 Irish Water	Water Supply Uisce Éireann welcomes the inclusion of CA7 Objective 1 which supports UÉ strategic projects. Uisce Éireann (UÉ) have indicated that the overall Greater Dublin Area water supply is currently classified as ‘Amber’, meaning it is constrained, particularly at times of drought. The solution to this issue is the Water Supply Project in the long term. Until then UÉ have indicated that water efficient design in new developments and retrofitting programmes would be welcomed. UÉ mention that water efficient houses with a reduced net water usage can provide multiple benefits including taking pressure off water resources and infrastructure, reduce carbon emissions and improve climate resilience.	CE Response: The content of the submission is noted. SDCC, in line with the provisions of CA7 Objective 1, are committed to working in conjunction with Uisce Éireann to protect the existing water and drainage infrastructure and in promoting the ongoing upgrade and expansion of water supply and wastewater services to meet the needs of the existing and future population of the LPF area and beyond. SDCC acknowledge that the water supply is constrained and will work with Uisce Éireann to deliver the Water Supply Project in the long term, which will terminate in SDCC. CA5 Objective 1 <i>‘Support Uisce Éireann in protecting existing water and drainage infrastructure and in promoting the ongoing upgrade and expansion of water supply and wastewater services to meet the needs of the existing and future population of the LPF area and beyond.’</i> SDCC also acknowledge the delivery of water efficient houses, which is include in the CDP under IE2 Objective 7, which promotes water conservation and best practice water conservation in all developments, including rainwater

		harvesting, grey water recycling and supporting the implementation of BS8515:2009 rainwater harvesting systems – code of practice. CE Recommendation: No change to Draft LPF.
SD-C367-81 Irish Water	Wastewater UÉ have mentioned that are no major changes to the wastewater system operating in Clondalkin since the preparation of the CDP, with sewage from the village flowing to the 9B Strategic Sewer that is near capacity and constrained. Capacity upgrades are required in addition to storm water storage, with new connections to the 9B catchment coming on a first come / first served basis. No storm water is to discharge into the foul network. UÉ state that local network upgrades will be developer led where there is no project on the UÉ Capital Investment Plan, with Clondalkin included in the City Centre Drainage Area Plan that will develop solutions regarding current network constraints. UÉ also mention that Wastewater Treatment is located at the Ringsend facility, and although there is currently capacity, the Greater Dublin Drainage Project is required to cater for the overall GDA. Objectives CA7 Objective 2 providing for the separation of foul and surface water drainage systems	CE Response: The content of the submission is noted. SDCC, in line with the provisions of CA7 Objective 1 and CA7 Objective 2 of the LPF, are committed to working in conjunction with Uisce Éireann to protect the existing water and drainage infrastructure and in promoting the ongoing upgrade and expansion of water supply and wastewater services to meet the needs of the existing and future population of the LPF area and beyond. To ensure that unnecessary further pressure is not put on the wastewater network CA7 Objective 2 requires all new developments within the LPF area to provide for a separate foul and surface water drainage system. CA7 Objective 1 states as follows: <i>‘Support Uisce Éireann in protecting existing water and drainage infrastructure and in promoting the ongoing upgrade and expansion of water supply and wastewater services to meet the needs of the existing and future population of the LPF area and beyond.’</i> CA7 Objective 2:

	and CA8 Objectives 1 -5 promoting Sustainable Urban Drainage Systems are welcomed.	<i>'Require all new developments within the Clondalkin LPF area to provide for a separate foul and surface water drainage system.'</i> Furthermore, both Chapter 3 and Chapter 4 Green Infrastructure of the LPF include objectives which require nature based solutions to surface water in the form of SuDS, which will reduce pressure on the drainage network alongside the other environmental benefits it provides. CE Recommendation: No change to Draft LPF.
SD-C367-95 The Heritage Council	Wastewater The submission commends the emphasis on riparian corridors. With the River Camac watercourse having a Q Rating of Poor, the Heritage Council welcomes policies and measures for wastewater management in the catchment. The submission recommends a new objective: <i>Objective X To require that all development proposals demonstrate compliance with the following:</i> <i>-'Planning for Watercourses in the Urban Environment and Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters" Inland Fisheries Ireland</i>	CE Response: The content of this submission is noted. The Draft LPF contains a number of policies and objectives which will facilitate compliance with all national and regional policy which deal with wastewater through the use of SuDS and Green Infrastructure approaches. These will be further supported by policy and objectives within the CDP, Chapter 4 Green Infrastructure and Chapter 11 Infrastructure and Environmental Services and by SDCCs SuDS Guidance. While the National Strategy is noted, it is considered that it is intended more as a road map at national level and that the SDCC SuDS guidance and the other guidance documents referenced in the submission are more immediately relevant to the LPF.

	<i>-Nature Based Management of Urban Rainwater and Urban Water Discharges, A National Strategy (May 2024)</i> <i>-Implementation of Urban Nature Based Solutions – Guidance Document for Planners, Developers and Developer Agents' LAWPRO (November 2024)</i>	Having regard to the recommended objective, wording can be added to an existing objective by way of supporting it through reference to guidance documents. CE Recommendation: Add wording to the end of GI6 Objective 3 in Chapter 4 to amend it from: GI6 Objective 3: <i>To ensure that nature-based solutions are employed in new open spaces and any upgrades or revisions to existing open spaces to improve surface water quality and, where relevant, aid flood alleviation.</i> To GI6 Objective 3: <i>To ensure that nature-based solutions are employed in new open spaces and any upgrades or revisions to existing open spaces to improve surface water quality and, where relevant, aid flood alleviation. To this end, have regard to SDCCs Sustainable Drainage Explanatory Design & Evaluation Guide 2022 and 'Implementation of Urban Nature Based Solutions – Guidance Document for Planners, Developers and Developer Agents' LAWPRO (November 2024).</i> And to add a new objective GI5 Objective 4 to read: <i>'To have regard to Inland Fisheries Ireland 'Planning for Watercourses in the Urban Environment and Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters'.</i>
--	--	---

SD-C367-81 Irish Water SD-C367-72 Land Development Agency	Surface Water and Groundwater UÉ welcome the inclusion of CA8 Objectives 1 – 5 (Surface Water and Groundwater). The LDA supports the policy basis for the inclusion and retrofitting of Sustainable urban Drainage Systems (SuDS) within developments, noting as SuDS inclusion within schemes advances, focusing more specifically on above-ground natural attenuation, recent schemes have resulted in conflicts regarding areas for taking in charge (TIC) by local authorities. The LDA encourages SDCC to review TIC procedures taking account of increased SuDS requirements on developers which cannot always be met exclusively on lands to be retained for management by an Owners' Management Company (OMC) or other similar structures. The LDA also encourages SDCC to consider increased TIC areas, which include permeable paving and other measures, to ensure all schemes can maximise the utilization of SuDS, with effective management and TIC possible once complete.	CE Response: The Uisce Éireann submission is welcomed and acknowledged. The content of the LDA submission is noted. GI4 Objective 4 of the CDP requires that all SuDS measures are completed to a taking in charge standard. <i>GI4 Objective 4: To require that all SuDS measures are completed to a taking in charge standard.</i> While taking in charge policy is outside the scope of the Draft LPF it should be noted that South Dublin County Council have an adopted Sustainable Drainage Explanatory Design and Evaluation Guide 2022 which contains several Suds design details in the appendix of the guidance document. SDCC will take in charge the sustainable drainage items listed in the appendix into the public realm if they are built to the prescribed specifications and standards. These include tree pits, swales and permeable paving within parking bay areas. CE Recommendation: No change to Draft LPF.
SD-C367-57 Cllr Francis Timmons	Flood Risk Management One submission states that in reference to CA9 Objective 1 -3 Page 22 and 23 the LPF should include an objective to investigate the potential to provide	CE Response: The content of this submission is noted. The Srulleen River and Fairview Oil Mills are both located outside the boundary

SD-C367-159 Monica McGill	flood defence and amenity at Srulleen River and the Camac River flowing through Fairview Oil Mills. In relation to CA9 Objectives 2 and 3, another submission asks will the council examine the possibility of allowing the Srulleen River to flow freely. A part of the river's course has been a clogged ditch for years, and restoring its flow could help alleviate future flooding.	of the Draft LPF area, and therefore fall outside the scope of the Draft Clondalkin LPF. However, the submission was passed on to the Camac FAS team for their information. CE Recommendation: No change to Draft LPF.
SD-C367-71 Office of Public Works	Flood Risk Management The OPW welcomes CA9 Objective 3 to support the delivery of the Camac Flood Alleviation scheme. The OPW references the Clondalkin Local Transport Plan (LTP) and the proposal for a new footbridge over the River Camac, stating there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, which requires consent from the commissioners under Section 50 of the Arterial Drainage Act 1945. The OPW also mention the River Camac Flood Alleviation Scheme which is underway and liaising with the project team regarding the proposed bridge.	CE Response: The content of the submission is noted and welcomed. CA9 Objective 3 states as follows: <i>'Support and facilitate, in tandem with the OPW and DCC, the delivery of the Camac Flood Alleviation Scheme, in as environmentally sensitive a way as possible and to ensure that zoning or development proposals do not impede or prevent the progression of this scheme.'</i> The requirement for consent for any future bridge is noted. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	Flood Risk Management The submission asks the council to make the co-operative study with DCC of the River Camac publicly available and take its findings on board.	CE Response: This request appears to refer to the Camac Flood Alleviation Study. The LPF study is not aware of any study which might be publicly available at this time, any relevant studies or documents will be made available through the public

	The submission queries whether the council will liaise with the owner of Kilmatead, regarding the River Camac's course through the site and the sluice gates on the property. It may affect the status of a nearby pond and could support the Camac Flood Alleviation Scheme. The submission states that the River Camac sluice gates, including at Sandy Hole, are part of Clondalkin's 'industrial past' and asks what the council's proposals are? Will they be regularly maintained and cleaned? The submission queries whether the council will liaise with the owner of the original industrial containment ponds. An option may be to maintain these ponds to honour the area's industrial heritage, while support biodiversity and assisting with flood prevention. The submission queries what are the council's proposals for the containment ponds opposite the leisure centre. Will they be maintained to aid biodiversity and prevent flooding.	consultation process for the Camac Flood Alleviation Scheme. It is suggested that direct contact be made with that project team should there be any queries relating to it. The location of Kilmatead and the Srulleen River are located outside the boundary of the Draft LPF. Both locations are outside the scope of works for the Draft LPF and are outside the remit of this Variation. It should be noted that the Camac flood Alleviation Scheme is currently undergoing Ecological Surveys which will support and inform the development of preferred options and the delivery of the Flood Alleviation Scheme. The containment ponds and the sluice gates opposite the leisure centre are outside the ownership of SDCC. The ownership of the Mill Ponds is complex with different historical rights for the use of water within them. However, the River Camac passes by the containment ponds to the west and there is a short section containing weirs on the river within Clondalkin Park that is in SDCC ownership, this area is referred to as Sandy Hole. SDCC maintain the river Camac flowing through Corkagh and Clondalkin Parks in line with the councils Parks and Open Space Strategy, Biodiversity Plan and Pollinator Plan. There are a number of objectives in Chapter 4, Green Infrastructure which support the option suggested in the submission. These include the overarching objectives set out in GI1, where GI1 Objective 3 states: <i>'Protect and enhance the natural, historical, amenity and biodiversity value of watercourses within the LPF area.'</i>
--	---	---

		<i>Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the relevant riparian corridors and the application of policy and objectives within the County Development Plan.'</i> The Camac River Corridor is identified in the County Development Plan and in the Clondalkin LPF as a strategic GI corridor with associated objectives to enhance the GI network by addressing habitat quality issues and improving its ecological value. Chapter 7 Conservation and Built Heritage specifically promotes the industrial heritage of the Mill Ponds as follows: <i>CBH3 Objective 7: 'To promote the amenity of the waterways including the Grand Canal, the Camac River and Mill ponds in an appropriate manner that aids interpretation of the architectural legacy of the mill industry and the canal infrastructure, promoting their historical significance and increasing awareness of their biodiversity value and environmental benefits.'</i> Given the explicit objective in Chapter 7, promoting the amenity, architectural legacy of the mill industry and biodiversity awareness alongside a strong emphasis on green infrastructure, including ecological connectivity, biodiversity and flooding, it is considered that the LPF adequately addresses the submission.
--	--	--

		CE Recommendation: No change to Draft LPF.
--	--	--

Electricity Infrastructure		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-153 Electricity Supply Board	Electricity Infrastructure The ESB state that deep reinforcement of the existing grid is essential to support the planned levels of sustainable growth in the South Dublin area. In this regard the ESB welcome policy objective CA11 Objective 1. The ESB require the long term operational requirements of existing utilities to be protected and highlight the importance of protecting their operations at their high-voltage substations within the LPF area. The ESB provides an essential service building and maintaining the electrical networks in South Dublin and throughout the Greater Dublin region. ESB states they own and operate a 38kV substation situated centrally within the LPF boundary along Ninth Lock Road, known as Clondalkin 38kV substation. They also state in addition to this two 110kV transmission lines traverse the northern section of the plan area, one via underground cabling and the other as an overhead line. These assets constitute a vital component of	CE Response: The content of the submission is noted. SDCC are committed to working, in conjunction with the ESB, to protect the long term operation requirements of existing utilities and protecting their operations at their high-voltage substations within the LPF area. SDCC acknowledges the role ESB plays in building and maintaining the electrical network in South Dublin and the Greater Dublin Area, understanding the importance of the assets they own within the LPF boundary to local and regional operations, which secure the delivery of a reliable electricity service. CA11 Objective 2 states as follows; <i>‘To explore with the ESB, the potential to relocate the existing substation on the Ninth Lock Road subject to it being feasible and maintaining the ability to cater for the current and future electricity demands in the LPF area.’</i> CA11 Objective 2 was included to explore the potential relocation with the ESB and other stakeholders at some

	ESBs local and regional operations, supporting secure and reliable delivery of electricity. The ESB note CA11 Objective 2, which explores the potential relocation of the Clondalkin 38kV substation, which the ESB state is not considered feasible due to its critical operational role, the technical and logistical challenges of moving such infrastructure and the absence of suitable alternative sites. In addition, the ESB also state they are currently constructing the Yellowmeadows 110kV substation, which once energised in 2027 will facilitate partial offloading of Clondalkin 38kV which is already at capacity. They go on to state that the strategic development including the partial offloading of Clondalkin 38kV is designed to facilitate the anticipated increase in energy demand arising from significant residential growth within the Clonburris SDZ. The ESB request that CA11 Objective 2 is reconsidered to reflect the unfeasibility of relocating the 38kV Clondalkin substation from its central location within Clondalkin and the LPF boundary.	stage in the future, if a potential site was identified. SDCC are aware of the challenges in offloading substations which are already at capacity and acknowledge the anticipated increase in energy demand arising from residential growth within Clondalkin LPF and Clonburris SDZ. The objective is worded to recognise that at present it may be unfeasible to relocate the 38kV Clondalkin substation from its current location on the Ninth Lock Road. However, with additional housing growth in the future and additional potential sites arising, CA11 Objective 2 facilitates the potential relocation should it become feasible. CA11 Objective should therefore remain in the LPF document. CE Recommendation: No change to Draft LPF.
SD-C367-153 Electricity Supply Board	Electricity Infrastructure The submission indicates ESB Networks commitment to expanding electricity capacity across Ireland to meet the needs of a growing population. Investment is strategically targeted to address current constraints	CE Response: The content of the submission is noted and welcomed. SDCC will continue its strong working relationship with the ESB to determine future requirements of the electricity grid, in order to facilitate the projected levels of development to

	while creating headroom for future growth. The ESB seeks proactive engagement with SDCC to collaboratively determine the future requirements of the electricity grid to facilitate the projected levels of development to accommodate the economic and residential growth within the LPF area. The ESB have stated they are ready to meet with the Council to discuss the impact of revised housing growth requirements, particularly regarding new residential zoning and the planning of supporting infrastructure. They further recognise the opportunities of early engagement with the Local Authority in relation to the design and delivery of new roads, public realm upgrades and the delivery of public greenways and the provision of ducting / undergrounding cables.	accommodate the economic and residential growth within the LPF area. CE Recommendation: No change to Draft LPF.
SD-C367-3 Martin Kavanagh	Electricity Infrastructure The submission notes that in Section 3.4 the undergrounding of high-voltage overhead lines, may limit circuit capacity as they may not be capable of carrying the same capacity as the overhead lines.	CE Response: The content of the submission is noted. The undergrounding of overhead power lines will require additional studies and processes before this development can happen. The capacity of the lines will not be compromised in the event that undergrounding does proceed. Any undergrounding will only be carried out with the agreement of ESB Networks and Eirgrid. CE Recommendation: No change to Draft LPF.

General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-2 Health & Safety Authority	Seveso Sites 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: 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	CE Response: The content of this submission is noted. The Draft LPF will be a variation to the County Development Plan (CDP). The CDP already refers to the EU Directive 2012 / 18 / EU on the control of major accident hazards in section 9.11 Seveso Sites of the CDP, and includes the following policy and objectives stated below. Policy EDE26: Major Accidents Have regard to the provisions of the Major Accidents Directive (European Council Directive 2012 / 18 / EU) and the technical advice of the Health and Safety Authority (HSA) in relation to identified SEVESO sites in the County. EDE26 Objective 1: <i>To have regard to the policy and approach of the HSA Guidance on Technical Land-use Planning Advice for Planning Authorities and Established COMAH Operators (HSA,2022) or any superseding documents where appropriate, in assessing planning applications and in preparing land use plans.</i> Table 9.4 of the CDP includes notified SEVESO sites at the time of its adoption in 2022. Three of the sites advised by the HSA in this submission are within the City Edge area and identified in Table 9.4. Microsoft Grangecastle has been included as a Seveso site since the adoption of the CDP.

	vicinity of such establishments. 4. Mention of the following notified establishments: Microsoft Grangecastle, BOC Gases Bluebell, Kayfoam Woolfson, Irish Distillers Fox and Geese.	None of the SEVESO sites listed in the submission are located within the LPF and furthermore their consultation distances do not extend into the LPF area. Therefore, it is considered that there is no requirement for their inclusion in the LPF and that their inclusion in the County Development Plan is more relevant providing for the necessary consultation for planning applications outside the LPF area. CE Recommendation: No change to Draft LPF.
SD-C367-51 Brian Kirk	General One submission refers to the environmental nuisance caused to residential areas and the GAA grounds due to SIAC operations in the area. The submission also notes the operation of SIAC within a residential zoned area and refers specifically to Z1 zoning. The submission states that the area should be reclaimed as a Z1 residential zoning and be used to act as a buffer between the village and Naas Road. The submission suggests that SDCC should negotiate with SIAC to relocate to a more suitable site away from residential areas. The submission expresses surprise that there is no mention of this in the Draft LPF despite the fact that the submitter states that they raised it during the consultation around the Decarbonisation Zone. The submission notes that the reduction in noise and air	CE Response: The content of this submission is noted. No Z1 zoning exists within the SDCC zoning matrix, the SIAC site continues to be zoned '<i>RES – To protect and / or improve residential amenity</i>'. SIAC has an ongoing business operating on the site. Where there is potential for a review of the current use the Council will engage with the landowners as part of pre-planning under section 257 of the Planning Acts or otherwise where appropriate. The Clondalkin Decarbonisation Zone, though it aligns with and is supported by the policy and objectives within the Draft LPF, is a separate plan with consultation being carried out under the South Dublin Climate Action Plan 2024 and a submission made in respect of that consultation will be considered within that process.

	pollution and the removal of trucks from the area would transform the place over night.	CE Recommendation: No change to Draft LPF.
--	---	--

Chapter 4: Green Infrastructure

Introduction		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	Introduction The submission supports the strategic approach to managing multi-functional green infrastructure. However, a distinction must be made between GI that is recreation/leisure based and GI that is part of the ecological network. The submission recommends inserting the following at the end of the paragraph ending in 'components' on page 26: <i>-However, it is recognised the GI features vary in terms of their distinct contribution to ecological networks as opposed to their contribution to recreation and leisure.</i> The submission also supports Objectives GI2 Objective 1, GI3 Objective 1 and objectives under Section 4.6.	CE Response: The content of the submission is noted and the intention recognised. However, it is considered that both the LPF and the County Development Plan make clear the distinction between the functions of GI and the importance of its ecological function within that. This is reflected in the vision for GI set out in the CDP and repeated in the LPF. It is further set out in section 4.2 of the LPF, which identifies the different themes within GI and through the overarching objectives in GI1. CE Recommendation: No change to Draft LPF.

Strategic Themes		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	Strategic Themes The submission strongly commends the GI analysis consisting of opportunities and gaps and if GI connections can be advanced over time, this would	CE Response: The contents and recommendations of the submission are noted and welcomed. It is considered that the wording used in GI1 Objective 7 is sufficient and that additional

	promote liveability. Design and maintenance are key considerations to ensure new connections contribute to the ecological network and provide 'stepping stones'. This is also true for all the other GI strategic corridors. The Heritage Council recommends amendments to two objectives (in bold) as follows: <i>GI1 Objective 2 – Ensure that all new development within the Clondalkin area strengthens the existing Green Infrastructure network where possible, to protect and enhance biodiversity, by retaining natural features, as far as practicable, as part of site design.</i> <i>GI1 Objective 7 – Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the County Heritage Plan and County Biodiversity Plan. Proposals should demonstrate how assessments, if required, have informed final site layout and landscape design.</i>	proposed wording is not necessary in this instance as the objective is supporting the County Heritage Plan and County Biodiversity Plan. However, the wording proposed for GI1 Objective 2 is considered appropriate subject to a minor amendment and should be included to strengthen the objective. CE Recommendation: Amend GI1 Objective 2 as follows: From <i>GI1 Objective 2 – Ensure that all new development within the Clondalkin area strengthens the existing Green Infrastructure network where possible, to protect and enhance biodiversity.</i> To <i>GI1 Objective 2 – Ensure that all new development within the Clondalkin area strengthens the existing Green Infrastructure network where possible, to protect and enhance biodiversity, including by retaining natural features, as far as practicable, as part of site design</i>
--	--	---

Green Links		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	Green Links Regarding GI13 Objective 2, the submission outlines that construction work often unnecessarily removes existing vegetation and trees despite providing ready-made ecological benefits that replacement planting can rarely replicate. Replacement planting should be used only as a last resort.	CE Response: The content of the submission is acknowledged. The objective referenced is GI 3 Objective 2 which states 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. Where Village Enhancement Schemes or new development requires the removal of trees, appropriate replacement planting shall be identified within the Plan area.’</i> In the first instance the objective looks to retain existing street trees and pockets of open space and plant new trees. However, the objective recognises that this may not always be possible. In that instance the objective requires appropriate replacement planting. While it is recognised that replacement planting can rarely replicate existing vegetation, there will be instances where, for reasons of good design and wider community benefit, some vegetation will have to be replaced. However, it is considered that GI3 Objective 2 can be strengthened. CE Recommendation:

		Amend GI3 Objective 2 from: <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. Where Village Enhancement Schemes or new development requires the removal of trees, appropriate replacement planting shall be identified within the Plan area.’</i> To read: <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 remove existing trees, in that instance appropriate replacement planting shall be identified within the Plan area.’</i>
--	--	---

Camac Riparian Corridor		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-162 Department of Housing, Local Government and Heritage	Camac Riparian Corridor The submission welcomes the policies and objectives to protect and enhance the GI network. This protection will significantly contribute to the conservation of flora, fauna and ecological important habitats. The area contains a number of high value nature conservation features including the Camac River corridor, and the Grand Canal proposed Natural Heritage Area. The submission notes that there are a number of key ecological sensitive features associated with the Grand Canal pNHA including white-clawed crayfish and five bat species and these are very likely to occur in the Camac River corridor. In addition, the Camac hosts brown trout (<i>Salmo Trutta</i>). It is also noted that opposite-leaved pondweed (<i>Groenlandia densa</i>), a protected plant species was previously recorded in the Camac and the Grand Canal in the Clondalkin area. The submission notes surveys carried out in the 2000s for the proposed west Dublin orbital LUAS identified otter sprainting sites on the Camac, upstream of the village. Otter movements were known to move freely between the Camac River and Grand Canal before the construction of New Nangor Road, and likely still do by an overflow stormwater culvert connecting the two under the road. The submission notes otter's strict	CE Response: The contents of the submission are noted. The strong endorsement of the LPF objectives within GI4, GI5 and GI2 to protect and improve the riparian corridor through specified ways are welcomed. While the Camac FAS and its management is outside the remit of the LPF, it is understood that a key objective of Flood Alleviation Schemes is that they provide environmental benefits including biodiversity enhancements in public parks and green spaces and improved water quality. The Camac FAS will also explore natural flood management options along the river catchment and this is supported in the LPF. The concern expressed regarding GI4 Objective 3 is noted. GI4 Objective 3 <i>'To support the completion of the Cycle South Dublin active travel route linking Corkagh Park with Clondalkin Village and onwards to the Grand Canal Greenway having regard to the need to maintain the integrity of the Camac riparian corridor, exploring any synergies with the Camac FAS.'</i> The delivery of this cycle route is a key link in achieving an uninterrupted cycle link across the wider area. The exact

	protection under Habitats Directive and states that routeways between the two waterbodies should be preserved and suitable foraging and lying-up habitat along these watercourses is maintained. The submission states it is important to retain as extensive an undeveloped corridor as possible along the Camac to ensure the continued presence of aquatic flora and fauna. The submission strongly supports GI 4 Objectives 1, 2, 3, 4, 5 and 7, GI 5 Objectives 1, 2, 3 and GI 6 Objective 2 to protect and improve the riparian corridor. The submission is concerned with GI 4 Objective 3 as any routing of a cycleway along the Camac - especially if illuminated - could be detrimental to the biodiversity of the area leading to increased light pollution and likely adverse effects on otter and light sensitive bat species. Given the intended implementation of the Camac Flood Alleviation Scheme, and the high biodiversity value of the Camac corridor, the submission indicates it would be desirable to carry out surveys of flora and fauna as soon as possible to inform what measures can be undertaken to enhance the biodiversity value alongside the implementation of the flood alleviation scheme such as the appropriate designs of bat boxes and identification of a location for artificial otter holts to be installed. The submission also recommends surveying the whole Clondalkin LPF area to identify	details of the route is not yet determined. The objective recognises that the integrity of the riparian corridor will need to be maintained and how this is achieved will have to be factored into the final routing of the scheme and any detailed measures relating to that routing. In this context the wording of GI 4 Objective is also noted. GI4 Objective 4: <i>To require, where feasible, the relocation of footpaths/cycleways to be considered from the inside to the outside of the minimum 10-metre riparian buffer. In all other cases active travel links should, insofar as is feasible, be located as a minimum 10 metres from the top of the bank of the river.</i> It is considered that the provisions of the LPF are appropriate in the context of this complex environment. The desirability of conducting surveys of the flora and fauna of the Camac corridor as soon as possible to inform the implementation of the Camac FAS is noted. It is understood that this will be part of the work conducted by the FAS team and engagement with that team would be a matter for the Department. CE Recommendation: No change to Draft LPF.
--	--	---

	locations of bat roosting and swift nesting sites, ensuring their conservation by informing development proposals and mitigation measures to minimize developments' effects on bats and swifts.	
SD-C367-191 Jamie Thompson	Camac Riparian Corridor Riversdale Residents Association recommends the protection of the Camac riverside. The submission highlights the loss of greenspace in the wider area and the greenspace in recent developments are not biodiversity and fail to make up for the loss of wetlands along the canal. In September 2025, Riversdale Residents Association agreed to a coordinated approach with the council, Waterways, Ireland Fisheries and Friends of the Camac that native vegetation would be introduced on the estate side of the Camac and thinning on the road side. This would benefit all including fish habitats, Riversdale Residents, and bus commuters.	CE Response: The protection of the Camac river and associated riparian corridor is set out within a number of objectives in the LPF as is support for integrated constructed wetlands. The Public Realm Department advises that following staff engagement with the discussions referred to in this submission the Public Realm Department will be planting some trees on the open space side of the River Camac during the 2025/2026 planting season. CE Recommendation: No change to Draft LPF.

Flood Risk Management and Riparian Corridor		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-145 Red Network	Flood Risk Management and Riparian Corridor The submission supports the potential use of integrated constructed wetlands for the Camac.	CE Response: The content of the submission is noted and welcomed. CE Recommendation:

		No change to Draft LPF.
SD-C367-111 Katie Goodwin SD-C367-179 Margueritte Sherry	Flood Risk Management and Riparian Corridor Submissions note the significant flooding at Clondalkin Park during the summer of 2025. With one submission including two attachments of this: one is a photo of flooding in Clondalkin Park and the other shows the location of where the photo was taken. Submissions contend that more up to date data should be used for flood risk and that the LPF fails to account for recent developments and increased impermeable surfaces. Submissions highlight the poor ecological condition of the Camac, and it is suggested that recent developments near Clondalkin Park have not adhered to the River Basin Management Plan guidelines. Concern is raised that the Ninth Lock Road Framework Site is on flood risk land and will increase flood risk in the area, disrupt hydraulic connections and will deteriorate the ecological condition of the Camac River which is failing to meet EU WFD objectives. It is noted that the Camac contains White-clawed Crayfish which are protected under the Wildlife Act.	CE Response: The Council is satisfied that the Strategic Flood Risk Assessment (SFRA) for the LPF has been carried out to a high standard. It is standard practice for the SFRA to review all available data even if it has been superseded, as the information still provides information on flood risk and therefore can be used in the SFRA. It is noted that the OPW, the body responsible for flooding, did not indicate any concern with the data used for the SFRA. The flooding of Clondalkin Park in the summer months referred to in the submission is on low-lying lands within the park and where areas are low lying or lie within Flood Zones A or B it would be anticipated that they would flood during times of heavy rain. The Water Framework Directive is aimed at protecting and improving water quality and is implemented through management plans and regulations. The LPF has included objectives which are in the County Development Plan on Riparian Corridors. The identified riparian corridors for Clondalkin were further examined as part of the SFRA for the LPF. Their purpose is to help protect water quality in line with the requirement of the WFD through appropriate set backs from the river bank. They also allow for a biodiversity corridor along the river. In existing urban areas legacy development may not always have met the current objectives.

		The SFRA has identified flood risk for the high-end floodrisk scenario. This shows a small area to the east of the Ninth Lock Site as being within Flood Zone B. It is considered that this can be adequately managed through an appropriate use of the lands and through design and layout of any future development. The site will also be subject to a site-specific flood risk assessment including a hydraulic model as part of the development application requirements. The site is located within Flood Zone B. Any development will also be required to be built in accordance with SDCC SuDS Policy including the application of nature-based surface water management. These measures, required as part of the development management process, will ensure that there will be no increase flood risk in the area, disruption in hydraulic connections or deterioration of the ecological condition of the Camac River arising from development of the framework site. CE Recommendation: No change to Draft LPF.
--	--	---

New Development		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	New Development The submission recommends amending Objective GI7, as to achieve nature led residential development, priority must first be given to the avoidance of sensitive sites followed by the retention of natural features, before any net gain/green space factors are applied or any 'ecologically friendly planting' are proposed. Recommendation (in bold): <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:</i> a) Avoid sensitive sites and features through site location and/or site design b) Retain natural features, as informed by ecological assessments <i>c) All new developments are 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</i>	CE Response: The contents of the submission are noted and the proposed amendments are considered appropriate. CE Recommendation: Amend GI7 Objective 1 as follows: From <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:</i> <i>a) All new developments are 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</i> <i>b) Provide for native tree and ecologically friendly planting on new development sites in line with public realm recommendations</i> To <i>Improve the ecological value and connectivity of landscape features within new development through the</i>

	<i>d) Provide for native tree and ecologically friendly planting on new development sites in line with public realm recommendations</i>	<i>implementation of the Green Space Factor, ensuring that all relevant developments meet the Green Space Factor score. In particular, ensure that all new development:</i> <i>a) Avoids sensitive sites and features through site location and/or site design</i> <i>b) Retains natural features, to the greatest extent possible, as informed by ecological assessments.</i> <i>c) Provides for native tree and ecologically friendly planting on new development sites in line with public realm recommendations</i> <i>d) Are 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</i>
--	--	--

General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-111 Katie Goodwin SD-C367-179 Margueritte Sherry	General Two submissions raise that there has been a net loss of trees and green space in the area and that quantification of this is needed within the plan and should be monitored. It is questioned whether detail can be provided on the amount of green space lost in the LPF area throughout the Development Plan period.	CE Response: Precise data in relation to GI losses and gains in relation to Clondalkin is not currently available. However, South Dublin County Council by virtue of the provisions of the County Development Plan 2022-2028 which has informed the LPF has taken a leading role in advancing GI protection, provision and monitoring and is currently developing a

	A submission states that the plan does not mention the Nature Restoration Law/Plan and its key aims including to mitigate against climate change impacts and to stop the loss of green space in built up areas. A submission questions the decarbonisation zone actions when the Ninth Lock Road Framework Site is being considered therefore reducing nature's resilience and its protective ecosystem services. It is suggested that a lower density development with a higher share of quality green infrastructure would be more beneficial and align with the Nature Restoration Plan obligations. A submission also asks the council how they will implement the Nature Restoration Plan. One submission further asks what the Green Space Ratio will be for residents. Some submissions use the example of the Seven Mills development in which hedgerows were removed. One submission states this was explained by a contractor that it was due to the shape of the zoned land parcel and this is seen as a flaw in the zoning of residential land. Any future approach should include qualified ecologists alongside planners to ensure developments can retain important habitats. One submission asks that zonings where the shape of the parcel allows for retention of hedgerows should be evaluated possibly through another variation.	biodiversity monitoring system around its own GI assets. In addition, the Council tracks all tree planting and removals within its remit. It is notable that a total of 2,400 trees were planted in Corkagh Park in March 2024 in a joint project between SDCC, Moyle Park School and Clondalkin Tidy Towns. In addition, the planning department works in conjunction with the Parks and Public Realm section of the Council and the Heritage Officer to ensure that GI is appropriately considered as part of all assessments for proposed development. Site visits and reviews of design are undertaken on an ongoing basis. It is acknowledged that there are at any given time a number of enforcement cases in the system relating to hedgerow or vegetation removal. Nature Restoration/Law/Plan The Nature Restoration Law is the first EU-wide legislation with legally binding targets to restore degraded ecosystems. It aims to have Member States restore at least 20% of the EU's land and sea areas by 2030 and all degraded ecosystems by 2050. The law mandates restoring habitats like forests, grasslands, wetlands, and rivers to improve biodiversity, support climate change adaptation, and reduce the impact of natural disasters. Ireland is applying the Nature Restoration Law (NRL) by developing a National Restoration Plan (NRP) coordinated by the National Parks and Wildlife Service and due to be submitted to the EU Commission by September 1, 2026.
--	---	---

		The National Parks and Wildlife Service are currently carrying out consultation to inform the National Restoration Plan. This process is still ongoing. It would therefore have been premature to include detailed provisions in relation to the Nature Restoration Plan. However, one of the notable potential elements of the NRP is the move towards requiring no net loss or potentially net gain in 'Urban Green Space'. The South Dublin County Development Plan 2022-2028 introduced the concept of the 'Green Space Factor' (GSF) for all new developments. This is a measurement developed by SDCC and used to assess the quantity and quality of green space in urban developments, ensuring that new development contributes positively to the environment. It serves as a planning tool to evaluate both existing green cover and the impact of new developments on green space provision. The GSF aims to secure a positive contribution to biodiversity, air quality and overall climate impact while improving the quality of life for new and existing residents of an area. This has significantly increased the use of nature-based solutions including SuDS in new development. South Dublin has a significant pollinator/Meadow planting programme and a significant tree planting programme. The SDCC Tree Management programme seeks to retain as many trees as possible only removing when no other option is available.
--	--	---

		The stated removal of hedgerows on the Seven Mills lands is outside the scope of the LPF. However, there are a number of objectives in the LPF including GI7 Objective 1, which set out the need to improve the ecological value and connectivity of landscape features, with recommendations for their further strengthening as part of this CE Report. The zoning of land through a variation process or otherwise goes through the relevant SEA and AA screening processes with further assessments at planning application stage. The Ninth Lock Framework site is a brownfield site which includes certain levels of contamination. Development Parameters for the Framework site are set out in Chapter 8 of the LPF and include for a number of parameters on the delivery of green infrastructure. CE Recommendation: No change to the Draft LPF.
SD-C367-159 Monica McGill	General The submission queries whether the council will devise a nature-sympathetic surface for greenways instead of the tarmacadam/harsh material used at present allowing bicycles, wheelchairs and buggies to use them. The term 'greenways' is misleading. The pathways are usually 'blacktops' and are out of character with the landscape.	CE Response: The issues raised on greenways are noted. However, routes must be resilient enough to withstand heavy cycle (and similar vehicle usage) and walking usage. The use of alternative surface finishes would lead to an unfeasible level of maintenance and cost implications particularly in the longer term. The term 'Greenway' widely accepted and while the Council acknowledges the concern about the term, it is which has become understood though its use within various

		guidance and policy documents and associated standards and funding mechanisms, including by the NTA. CE Recommendation: No change to Draft LPF.
--	--	---

Chapter 5: Sustainable Movement

Active Travel		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-94 Transport Infrastructure Ireland	SM1 Objective 1 TII recommends the following changes to SM1 Objective 1: ‘To deliver subject to detailed design, <i>and compliance with TII Publications or DMURS as appropriate</i>, and further public consultation, as part of the local authority development process (Part 8) the active travel measures identified in Figures 5.7 and 5.8, which will enable better connected facilities throughout the Plan area and beyond, increase permeability and provide a safer walking and cycle network.’	CE Response: The content of this submission is noted. The Draft LPF will be introduced to the County Development Plan (CDP) through a Variation. All policies and objectives within the LPF are aligned to the CDP as required in the hierarchy of planning policy documents. It is generally not considered appropriate to repeat the broader policy and objectives of the CDP throughout the LPF. As provided for in the CDP, all policy and objectives are required to be compliant with TII publications and DMURS. These are provided for in SM5 Objective 2 (DMURS) and SM6 Objective 4 (TII publications). However, in the context of the objective it is considered appropriate in this instance to amend the objective to include ‘<i>including compliance with DMURS as appropriate</i>’ CE Recommendation: Amend SM1 Objective 1 to read: ‘To deliver subject to detailed design <i>including compliance with DMURS as appropriate</i>, and further public consultation, as part of the local authority development process (Part 8) the active travel measures identified in Figures 5.7 and 5.8, which will enable better connected facilities throughout the Plan area and beyond, increase permeability and provide a safer walking and cycle network.’

SD-C367-4 Bea CarBan	General This submission states that they firmly stand behind the goals of Sustainable Movement for All, which seek to: – Expand and improve travel choices – Reduce traffic volumes and reliance on private cars – Deliver safe and accessible walking routes – Provide strong investment in cycling and public transport Calls for a firm commitment to sustainable transport, community safety, and local well-being as the future of Clondalkin depends on policies that prioritise people, safe mobility, and community infrastructure—not oversized vehicles.	CE Response: The content of this submission is noted. The council recognise the need to support the goals of sustainable movement for all within Clondalkin. The LPF will aim to expand and improve travel choices, aim to reduce traffic volumes and reliance on cars, deliver safe and accessible walking routes throughout the boundary and invest in cycling and public transport. SM1 Objective 3 aims to create a ‘movement’ towards more active modes of travel within the village and surrounding areas, where possible, by working with communities to highlight health, safety and environmental benefits of altering how we travel. CE Recommendation: No change to Draft LPF.
----------------------	---	--

Walking		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-94 Transport Infrastructure Ireland	SM2 Objective 2 TII recommends the following changes to SM2 Objective 2; “To support the development of future pedestrian crossing infrastructure and improvement projects outlined in Figure 5.7, subject to a reduction in speed limits and detailed review and design, <i>including compliance with TII Publications or DMURS as appropriate</i>, to facilitate a mode shift and reduction in the usage of private motor vehicles and associated congestion.”	CE Response: The content of this submission is noted. The Draft LPF will be introduced to the County Development Plan (CDP) through a Variation. All policies and objectives within the LPF are aligned to the CDP as required in the hierarchy of planning policy documents. It is not considered generally appropriate to repeat the broader policy and objectives of the CDP throughout the LPF. As provided for in the CDP, all policy and objectives are required to be compliant with TII publications and DMURS. These are provided for in SM5 Objective 2 (DMURS) and SM6 Objective 4 (TII publications).

		However, in the context of the objective it is considered appropriate in this instance to amend the objective to include '<i>including compliance with DMURS</i>', in line with national and regional policy provisions. CE Recommendation: Amend SM2 Objective 2 to: “To support the development of future pedestrian crossing infrastructure and improvement projects outlined in Figure 5.7, subject to a reduction in speed limits and detailed review and design, <i>including compliance with DMURS</i>, to facilitate a mode shift and reduction in the usage of private motor vehicles and associated congestion.”
SD-C367-156 Alan Banks SD-C367-138 Paul Gogarty TD SD-C367-158 Christopher Conway	Walking A number of submissions support the council's efforts for pedestrian upgrades noting that many locations around the village have narrow footpaths requiring pedestrians to walk onto the road if a person and pram, or two people are coming towards you. For example, on the left side of Monastery Road heading to the village opposite Castle Crescent. Another submission supports walking and regularly walks if the weather permits. Another submission notes that footpaths are currently unsafe for pedestrians and walking to the local shops is now less safe than driving. This a real and serious risk for residents in this area due to how narrow the footpaths are and the number of e-scooters using them. The submission also points out that while walking and cycling are good for fitness and general wellbeing, not everybody is fit and well enough /able	CE Response: The contents of these submissions are noted. The council recognise the need for improving footpaths throughout the Draft LPF boundary. SM2 Objective 1 will support the development and enhancement of walking infrastructure within the Draft LPF area by increasing permeability, improving and creating pedestrian crossings, widening footpaths where feasible and providing an attractive public realm facilitated by village enhancement schemes. CE Recommendation: No change to Draft LPF.

SD-C367-4 Bea CarBan	bodied to walk and cycle. It notes also that walking has become an increasingly unpleasant and dangerous experience due to e-scooters (teenagers and adults) on the paths and roads.	
SD-C367-176 Grace Keane		
SD-C367-179 Margueritte Sherry	One submission requests the upgrading of some of the cobblelock pathways for safety in the village.	
SD-C367-197 Rhona Kerins	One submission notes that the Old Nangor Road from the Gaelscoileanna down to the Mill shopping centre is extremely dangerous for pedestrians. The footpaths are narrow and there are no traffic calming measures to reduce cars speeding down the slope. It also notes that there will soon be 3 schools here making the safety situation worse. It also notes that the entrance to the Mill SC is very wide (4 cars) and asks why there is no proposal to narrow the road here.	
SD-C367-173 Ann Gilsenan		
SD-C367-113 Tony Browne		
SD-C367-146 Victor Madden	Another submission notes that paths do need an upgrade as some in Monastery Rise and Monastery Road, for example, outside Floraville are raised up and also before The Laurels Pub outside the petrol station. One submission supports the delivery of safe and accessible walking routes. A submission states that large puddles on the footpath on Monastery Road regularly occurs due to the uneven nature of the path. This poses a risk in winter due to freezing. A submission states accessible footpaths are needed.	
SD-C367-157 Ms F O'Connell	Ebikes / Escooters	CE Response: The content of this submission is noted. While it is recognised that there is concern on this issue, regulation on

SD-C367-111 Katie Goodwin	The submission states that ebikes/escooters are dangerous, cause accidents and users do not obey the rules of the road. They need to be legislated. Another submission notes that there is a particular issue in Clondalkin around the improper use of and speeding related to e-scooters and ebikes facilitating anti-social behaviour. This needs to be taken into account across the LPF area and de-carbonisation zone. It is now less safe for pedestrians walking on footpaths to the local shops and less safe for drivers also.	the use of e-scooters and e-bikes are dealt with under the Road Traffic and Roads Act 2023 and fall outside the remit of the LPF. CE Recommendation: No change to Draft LPF.
---	---	---

Cycling		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-4 Bea CarBan SD-C367-90 Avril Doyle SD-C367-145 Red Network SD-C367-138 Paul Gogarty TD SD-C367-158 Christopher Conway	Cycling (Positives) A number of submissions are supportive of cycling and the cycle network proposals. A submission is supportive of the Corkagh to Grand Canal cycle route and the Tallaght to Clondalkin cycle route as they are essential to making communities healthier, safer, and better connected. One submission stated they support the proposed cycle network additions within the plan, as identified on Page 40. Another submission welcomes the cycle way along Ninth Lock Road and states this should be continued at least to the Grand Canal and preferably to the Fonthill Road.	CE Response: The content of these submissions is noted. The Draft LPF will support the development of future cycle infrastructure and improvement projects, subject to further public consultation on their detailed design. Where feasible, cycle lanes will be segregated but it is recognised in the LPF that this will not always be possible given the constraints within the existing road widths. It is the intent within the LPF to facilitate a cycle way along the Ninth Lock Road as far as the New Nangor Road. This is provided for in the design parameters for the Ninth Lock Framework site and the objectives for the Village Enhancement Scheme. CE Recommendation: No change to Draft LPF.

	Another submission is supportive of improved safety and access for cyclists but wants cycle lanes to be segregated from cars and pedestrians.	
SD-C367-179 Margueritte Sherry SD-C367-65 David Tyrrell SD-C367-99 Siobhan O'Neill SD-C367-124 Deborah Arnold SD-C367-173 Ann Gilsenan SD-C367-183 Nicola Flynn SD-C367-199 Woodford Resident SD-C367-1 Cllr Trevor Gilligan PC SD-C367-142 Jamie Nolan SD-C367-172 JOS Services	Cycling (Negative) A number of submissions object to the proposed cycle lanes through the village including on Tower Road, Orchard Road, New Road/Laurel Park, Boot Road as narrowing these roads will severely restrict traffic and contribute to an already congested traffic system. A number of submissions question if provision of cycle lanes will lead to further eroding / narrowing of road space, for example, Main Street, Clondalkin, barely has space for one car, so if a cycle lane is installed, there is no space for cars. Two submissions state that it is not entirely clear from the maps or the plan what exactly is proposed. One submission states that the plan is vague and an ordinary person without 'map reading' skills cannot understand the maps. Another submission objects to any reduction of vehicular access in and around the village in favour of cycle lanes. Another submission asks regarding the proposed cycle lane through the village Main Street: What roads will these cyclists be travelling on into the village in the first place? It notes that as it is, there are no cycle lanes into the village. Ninth Lock Road appears to be the only road wide enough to facilitate a cycle lane. It also notes that Monastery Road is not wide enough for a cycle lane (apart from the short cycle lane outside	CE Response: The content of these submissions is noted. The Local Transport Plan (LTP) was completed using the ABTA (Area Based Transport Assessment) process, which ensures that the assessment of transport demand and its associated impact plays a central role in informing the development proposals of policy documents. The process considers overall scale of development as well as mix of land uses, location, density, phasing and design / delivery of supporting transport infrastructure and services. Essentially, the LTP function is to integrate land use and transport planning centrally within the Plan preparation process. The Local Transport Plan, which supported the preparation of the Draft Local Planning Framework, followed an iterative process to arrive at a preferred approach to transport, assessing different transport options which could have a positive effect on transport and on reducing congestion in the village. Though a variety of opportunities were assessed, the council have recognised that not all would be appropriate to enact based on the outcome of three rounds of public consultation. Following the final pre-draft consultation a package of measures was brought forward into the LPF to help with modal shift through measures to improve travel options, reduce congestion, and help reduce emissions towards climate targets. The options were also considered in the light of safety and improving the wider environment around the village. The package of options put forward will work

SD-C367-146 Victor Madden	Monastery Gate to Monastery Heath). Another submission states that there is no safe cycling route along much of Monastery Road.	together to achieve this but do not involve any changes to existing car access to the village.
SD-C367-177 Marie Cranny	One submission notes that the provision of a cycle lane from Boot Road to Tower Road is impossible unless the size of footpaths are reduced. On the other	The LPF then integrated that preferred approach, in the way most appropriate to complement other chapters and relevant objectives of the plan, as set out by way of a transport strategy in Chapter 5 of the LPF. It is the LPF which is the proposed Variation to the County Development Plan.
SD-C367-156 Alan Banks	2 roads there is only room for one cycle lane in one direction. Another submission highlights that 3.7% of the population within SDCC currently cycle to school,	
SD-C367-137 Derek O Kelly	college or work on a daily basis, a small percentage of the population, yet plans to place cycle lanes through the village (Figure 5.4 of the LPF). Concerns are	Figure 5.8 of the LPF shows existing and indicative future cycle connections within the plan lands. This is broken down into Greenways, Primary Links, Secondary Links, Feeder Routes and Future Cycle Connections. On this map Laurel Park / New Road is identified as a Primary Link with cyclists accommodated within segregated / mixed traffic (at 30kph speed limit).
SD-C367-123 Cllr Linda de Courcy	raised about the Boot / Convent / Tower Road proposal, a road which is not wide enough to accommodate cycle lanes and traffic. The submission goes on to state that this would have a serious effect on the freedom of movement for all residents of this road, as well as any estate or cul-de-sac which opens onto this road. The introduction of cycle lanes will also lead to further emissions and longer journey times in cars.	
SD-C367-202 Aeton Family		
SD-C367-203 Philip Whitty		Many of these routes are already part of the Cycle South Dublin programme approved by councillors in 2021, presenting an ambitious programme of work that reflects the increasing importance of making cycling a realistic and integral part of how people move around the County. This includes two cycle schemes through Clondalkin establishing an east – west route and a north – south route. SM3 Objective 1 looks to support the development of the Corkagh to Grand Canal cycle route and the Tallaght to Clondalkin cycle route as part of the approved Cycle SD schemes. The Corkagh Park to Grand Canal Greenway is identified on Figure 5.8 as GR1 highlighting the potential route on or adjacent to Watery Lane with additional public consultation on the proposed route required. The issues raised for Riversdale are noted and will be considered as
SD-C367-204 Bernadette Jewel	A submission highlights objection to the delivery of a cycle lane along Watery Lane, another narrow road which would not be able to support footpaths, cycle lanes and two lanes of traffic. Any restriction of traffic flow would negatively effect the ability of residents along this road to go about their daily business. The introduction of cycle lanes will also lead to further emissions and longer journey times in cars.	
SD-C367-205 Breda Fitzsimons		
SD-C367-206 Caroline Fallon		
SD-C367-207 Carroll Family	The submission states that Riversdale Residents Association has concerns regarding:	

SD-C367-208 Laura Goke		part of the assessment of a final route alignment including the necessary environmental assessments as part of that.
SD-C367-209 Cormac Dowling		The Council recognises that on certain routes there is no appropriate space for segregated or even part segregated cycle lanes. In those circumstances the routes will remain the same as they currently are, mixed traffic which allows the movement of motorised vehicles and bicycles through the village. This is highlighted in Figure 5.8 'Existing and indicative future cycle connections within Clondalkin' where the black routes through the village are identified as 'shared road space between vehicles and cyclists'. Cyclists are accommodated on these roads facilitated by the proposed reduction in speed to 30 km/h which will allow the traffic and bikes to share the surface more safely. This is the case for Boot / Convent / Tower Road identified on Figure 5.8 as 'Feeder Routes' F1 and F2 and on Monastery Road S4, Main Street S3, and Orchard Road P2, described as 'cyclists accommodated within mixed traffic at 30 km/h speed limit'. The only change being proposed is to the speed limit in order to improve safety and align with alterations to the Road Traffic Act 2024. Speed limits will be reduced to 30km/h, where appropriate. The aim is to have these 30km/h limits in place by 31 March 2027. Local authorities will hold public consultations before any changes are made.
SD-C367-210 Cronin Family		
SD-C367-211 Damien Bimowski		
SD-C367-212 Donna McGlynn		
SD-C367-213 Edel Sayce		
SD-C367-214 Elaine Fannin		
SD-C367-215 Elizabeth Caddle	The provision of more cycle lanes in the village only leads to dead ends.	
SD-C367-216 Sinead McEvoy	Another submission is against cycle lanes within the village and states the only way to fit cycle lanes is to convert a footpath on one side of a road to a cycle lane. Squeezing cycle lanes onto narrow footpaths or narrow roads will not work.	
SD-C367-217 J O' leary		In other instances, there may be space on roads also identified in Figure 5.8 to accommodate fully segregated cycle infrastructure, for instance along Ninth Lock Road.
SD-C367-218 Geraldine Courtney		
SD-C367-219 Kay O'Byrne	A number of submissions were received from the residents of St. Bridgid's Road and businesses within Clondalkin village, who oppose the inclusion of cycle lanes within the village despite assurances received	The means of progression of the identified cycle ways will be reviewed in detail at project stage and will be subject to further consultation.

SD-C367-220 Lestrange Family	from SDCC. The submission did acknowledge that KPMG and SDCC met with residents associations and business groups, and after research found that the roads were not wide enough for cycle lanes and yet they are proposed again.	CE Recommendation: No change to Draft LPF.
SD-C367-221 Michelle Dagg		
SD-C367-222 Margaret Doody		
SD-C367-223 Martin O'Keeffe		
SD-C367-224 Mary O'Neill		
SD-C367-225 Marie Kearns		
SD-C367-226 Olga Dalgetty		
SD-C367-227 Tania Daly		
SD-C367-228 Casey Family		
SD-C367-229 Collins Family		
SD-C367-230 Halpin Family		

SD-C367-231 Keogh Family SD-C367-232 Sullivan Family SD-C367-233 Helen Spall SD-C367-235 Floraville Residents SD-C367-234 Lisa O' Neill SD-C367-200 Clondalkin Residents		
SD-C367-94 Transport Infrastructure Ireland	SM3 Objective 2 TII recommends the following changes to SM3 Objective 2: To support the development of future cycle infrastructure and improvement projects outlined in Figure 5.8 and Table 5.2, subject to detailed design, <i>including compliance with TII Publications or DMURS as appropriate</i>, and public consultation, which facilitates a mode shift and reduction in the usage of private motor vehicles and associated congestion.”	CE Response: The content of this submission is noted. The Draft LPF will be introduced to the County Development Plan (CDP) through a Variation. All policies and objectives within the LPF are aligned to the CDP as required in the hierarchy of planning policy documents. As provided for in the CDP, all policy and objectives are compliant with TII publications and DMURS. These are provided for in SM5 Objective 2 (DMURS) and SM6 Objective 4 (TII publications). However, the proposed amendment can be included as set out. CE Recommendation:

		Amend SM3 Objective 2 to read: To support the development of future cycle infrastructure and improvement projects outlined in Figure 5.8 and Table 5.2, subject to detailed design, <i>including compliance with TII publications and DMURS as appropriate</i>, and public consultation, which facilitates a mode shift and reduction in the usage of private motor vehicles and associated congestion.”
SD-C367-123 Cllr Linda de Courcy	Proposed Cycle Lane Ninth Lock Road The submission objects to a cycle lane on the Ninth Lock Road, which would lead to the removal of a bus lane. The submission states that efficient public transport is the best way to reduce reliance on private vehicles, with members of the community using the bus ensuring free movement. The introduction of cycle lanes will also lead to further emissions and longer journey times in cars.	CE Response: One of the ambitions of the LPF and the urban design strategy for the village is to improve the poor village environment along the extended blank frontage of the Mill Shopping Centre as it presents to the Ninth Lock Road. The road space currently consists of a narrow footpath along the blank wall, the northbound bus lane, two vehicular lanes and the footpath on the eastern side. As shown on Figure 5.1, Cycle South Dublin has already identified the need for a cycle route along the Ninth Lock Road as part of its programme (Routes - SDCC). The LPF has incorporated this key arterial route to facilitate active travel from the Grand Canal and beyond to the village. The route is identified in Table 5.2 of the LPF as a Primary Link, ‘P1’, with the description ‘Segregated cycle infrastructure along Ninth Lock Road’. With this in mind, options for the Village Enhancement Scheme (VES, Chapter 8) for this section of road alongside the Mill Centre were considered. As the building itself will not move and new openings within it are unlikely, the main visual improvement would be to soften the extent of the blank façade through planting or planters. To make it more

		pedestrian friendly, the widening of the existing footpath on the western side would also be a significant improvement, including for those waiting on the bus. However, there is not sufficient space to accommodate the bus lane, planting, the existing road vehicular road space and improved footpaths and the Cycle South Dublin route. In examining the options, SDCC reviewed the camera footage of queues going northbound to ascertain if the removal of the bus lane for this short section of road would unduly hinder travel times. The footage indicated that it was unlikely that it would. However, as part of detailed design the NTA would have to be consulted further on the proposal. An indicative plan for the Ninth Lock Road VES is included in the Urban Design Strategy as Figure 8.21 on page 93. As indicated above, how this would emerge in practice will be subject to detailed design and further consultation. CE Recommendation: No change to Draft LPF.
SD-C367-113 Tony Browne SD-C367-171 Claire McCarthy SD-C367-117 Teresa Farry Roberts SD-C367-183 Nicola Flynn	Cycling A number of submissions state that cycle lanes would be good if a large share of people cycled but cycle lanes will not be used. One submission notes that only 4% of the population cycle. The lack of cycle lanes is not the issue, the weather is. We live in a mainly wet and windy environment. No one is going to start cycling to the level the LPF think they will, cycle lanes or not.	CE Response: The content of these submissions is noted. The council are of the view that cycling will grow within the Draft LPF boundary as a viable alternative to driving where improved infrastructure is provided, for those who want to. The council recognise that the elderly population and others may not be able or want to cycle but creating opportunities for those who can and want to should be provided for in order to provide a less congested village, healthy travel options and achieve our national and local Climate Action goals.

SD-C367-156 Alan Banks SD-C367-137 Derek O Kelly SD-C367-157 Ms F O'Connell	Another submission states that as regards to cycle lanes they are confident that if the council took the time to survey /consult the schools /workplaces in area you would find quite insignificant numbers that would actually use them. Another submission states it is unfair for the vast majority of the local population to be put at a disadvantage in order for a tiny number of the population to have more cycle access. Another submission notes on page 44 of the plan that "Clondalkin requires a cycle network which will facilitate cycling for all". Why is there an assumption that "all" wants to cycle. There is an over emphasis on accommodating school going children (many of whom probably won't cycle in anyway) at the expense of those won't, don't or can't use bikes e.g. persons with mobility problems, mature and older residents and those who have never cycled and would not be confident in doing so. This will impact on persons been able to shop, socialise and get to medical appointments, thus impacting on wellbeing and health.	The significant increase in cycling in Dublin and nationally suggests that bad weather is not a sufficient hindrance to prevent those who wish to cycle doing so. As part of the development of the Draft LPF, the council have engaged directly with all schools located within the area. The same issue around safety outside schools continues to emerge from speaking with principals, staff members and students within each school. The provision of cycling infrastructure is just one measure which will enhance safety outside schools. Other opportunities include the provision of Safe routes to Schools, a reduction in the speed limit, improving footpaths for walking, ensuring safe crossing points and providing, where possible, a permeable network which will improve journey times by walking and cycling and improve safety. CE Recommendation: No change to Draft LPF.
SD-C367-187 Margaret Caddle	Cycling Designation of cycle lanes using bollards is a proven safety issue as emergency services cannot access areas. Use of curbs to delineate cycle lanes is dangerous for pedestrians as cars drive off road to facilitate emergency vehicles.	CE Response: The content of this submission is noted. Any cycle lanes through the Part 8 process will go through a detailed design assessment including of bollards, kerbing etc. CE Recommendation: No change to Draft LPF.
SD-C367-197 Rhona Kerins	Cycling One submission questions why since the LPF is focusing on getting people out of their cars around	CE Response: The content of this submission is noted. As provided for in SM11 Objective 4 of the Draft LPF, the council will support

	the village, why there is no bike scheme, similar to Dublin Bikes included? It would be far easier to cycle to and from different locations. The submission also notes that there is no secure lock up locations within the village for people to reply on.	the delivery of a mobility hub in conjunction with the NTA and third party providers to serve the village, by supplying the population with alternative and renewable forms of transportation with drop off points at central locations throughout the Plan area. <i>SM11 Objective 4: To support the delivery of a mobility hub, in conjunction with the NTA and third-party providers, at an appropriate location to serve the village of Clondalkin, to supply the population with alternative and renewable forms of transportation with drop off points at central locations throughout the Plan area.</i> Additional measures will also be considered as part of the actions for the Clondalkin Decarbonisation Zone (DZ). CE Recommendation: No change to Draft LPF.
SD-C367-157 Ms F O'Connell SD-C367-111 Katie Goodwin SD-C367-179 Margueritte Sherry SD-C367-160 Patrick Duffy	Cycling The submission states that ebikes/escooters are dangerous, cause accidents and users do not obey the rules of the road. They need to be legislated. Another submission notes that there is a particular issue in Clondalkin around the improper use of and speeding related to e-scooters and ebikes facilitating anti-social behaviour. This needs to be taken into account across the LPF area and de-carbonisation zone. It is now less safe for pedestrians walking on footpaths to the local shops and less safe for drivers also.	CE Response: The content of this submission is noted. Regulation on the use of e-scooters and e-bikes are dealt with under the Road Traffic and Roads Act 2023 and fall outside the remit of the Council. CE Recommendation: No change to Draft LPF.

	One submission states that E-scooters should be banned for safety reasons adding that they contribute to the ubiquitous amount of e-waste traversing the globe in bunker ships which use the most polluting form of oil. Another submission states that the council should address the E-Scooter problem in Clondalkin.	
--	---	--

Permeability - General		
A number of submissions refer specifically to permeability links Per 1, Per 2, Per 3, Per 4 and Per 5 etc. This terminology and detail has been referenced from the Local Transport Plan (LTP). While the Local Transport Plan was prepared to support the LPF in making recommendations on the transport strategy, it is the LPF which is the proposed variation to the County Development Plan. In reviewing the recommendations of the LTP, the Local Planning Framework also considered the other aims and objectives of the plan for Clondalkin. While the recommendations set out in the LTP are generally included in the LPF there are some that are not included and some of the recommendations may have been included as more general objectives which will be subject to more detailed technical review and / or further public consultation prior to decisions on implementation. In summarising submissions reference is made to the actual provision and detail of the LPF rather than the Local Transport Plan as the former is the document which will be before the Council for decision. Per 5 in the Local Transport Plan which refers to a link between Monastery Rise and Floraville is not proposed in the Draft LPF. There is no proposal to provide a permeability link at this location.		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-10 David Tyrrell	Permeability- General A submission states that we are facing a climate crisis and it is essential that we support sustainable movement in every possible way. Permeability improvements are essential for those with disabilities and mobility issues. Submission states they do not believe that increasing walkability and permeability would increase the level of antisocial activity in these	CE Response: The content of these submissions is noted. This response deals with general issues raised with the permeability proposals, further responses are made to submissions on specific permeability proposals. It should be noted that the NTA and OPR are supportive of permeability measures throughout the LPF area.
SD-C367-32 Susan McDonagh		
SD-C367-113 Tony Browne		

SD-C367-134 SEBASTIAN TINEGHE	areas rather it would have the opposite effect with higher footfall making the area feel more active.	The Local Transport Plan (LTP) was completed using the ABTA (Area Based Transport Assessment) process, which ensures that the assessment of transport demand and its associated impact plays a central role in informing the relevant policy documents, in this case the Clondalkin Local Framework Plan. Essentially, its function is to place the integration of land use and transport planning centrally within the Plan preparation process. Having assessed a number of options which it was considered could relieve traffic congestion within the village, support modal shift with associated environmental and health benefits, and having gone through a number of pre-draft public consultation exercises, a package of low intervention recommendations emerged from the LTP process. These recommendations have been integrated into the Local Planning Framework in the way considered most appropriate to the overall framework. As highlighted in the introduction to this section, the full detail in the LTP recommendations has not always been included in the LPF. This is largely because the LPF recognises that there will need to be further design analysis and public consultation for the package of measures including the permeability links. The LPF has also categorised the proposed links into Priority, Secondary and Strategic. As set out in Chapter 5 of the LPF in the text, objectives and in Tables 5.4, 5.5 and 5.6 the different category of links helps to make clear their purpose. Priority links have been identified in the LPF on the map in Figure 5.9 and explained in Table 5.4. They are focused on
SD-C367-150 Mia Colgan	Many submissions are of the view that the current proposals will only increase traffic and anti-social behaviour and have indicated that lanes and entrances were previously closed for good reason. Lanes and alleyways attract loitering and increase the risk of crime to people and property. It is indicated that there are not enough Gardai to deal with the issues that would arise. The proposed permeability links do not provide a sufficient benefit that outweighs the long-term negative consequences. There are already many perfectly sufficient existing pedestrian routes around Clondalkin. A submission sites examples where opening of laneways generally leads to anti-social behaviour and ends up being gated. Another submission notes that while the idea of this is idyllic, the reality is that it would encourage antisocial behaviour, crimes like drugs and burglaries and create no go areas for the residents, these areas are residential with families and elderly people.	
SD-C367-180 Mark Goodwin		
SD-C367-183 Nicola Flynn		
SD-C367-192 Eileen Cronin		
SD-C367-39 Oliver Murray		
SD-C367-1 Cllr Trevor Gilligan PC		
SD-C367-172 JOS Services		
SD-C367-177 Marie Cranny		
SD-C367-101 Tony Wall	A number of submissions raised the issue of E Scooters, their speed and improper use and dangers they present. A submission indicates that this is a particular issue in Clondalkin where it facilitates anti-social behaviour. This needs to be taken into account across the LPF area and de-carbonisation zone. It is now less safe for pedestrians walking on footpaths to the local shops and less safe for drivers also. Concerns are expressed that opening lane ways and estates into each other will lead to scooters flying around the paths.	
SD-C367-193 Avril McLoughlin		

SD-C367-111 Katie Goodwin	A submission objects to all proposals to open additional access to foot traffic, cycling, electric bicycles, and electric scooters. It was indicated that this change would significantly alter the character and safety of neighbourhoods, and many residents share deep concerns about its potential impact on noise levels, privacy, and pedestrian safety, nearly impossible access into estates due to narrowing of car entries routes creating traffic jams and queues especially at rush hours, morning school start/finish, particularly for children and older residents.	creating safer routes to schools to try and provide better options for children and their parents / guardians to get to their schools without having to use the car. It is recognised that this will not be possible for all parents, but it is based on the evidence provided in Table 5.3 that the top ten origin-destination trips originating within the Plan area are from residential areas to schools. Any reduction in these trips would help relieve congestion in the village.
SD-C367-173 Ann Gilsenan	Another submission objects generally to permeability and traffic restriction proposals in Clondalkin as set out in the LPF.	
SD-C367-171 Claire McCarthy		Secondary links are also shown in Figure 5.9 and detailed in Table 5.5. These routes have been identified as benefitting walking and cycling movement, helping to connect places within and around the villages. While their delivery would be beneficial to help with general accessibility, they have not been identified as priority routes as they do not directly facilitate decongestion and safety around schools.
SD-C367-168 James Wynne	A number of submissions refer to previous road interventions by SDCC which have not achieved the desired objectives, examples are given of the SIAC Roundabout and changes to the entrances/exits to existing roads in the area. Concerns that the permeability routes will also be a failure.	Strategic links are identified to be delivered in the longer term as opportunity arises. Any such opportunity would likely only arise on foot of a planning application on the lands concerned. For example, as part of backland or infill development within the village centre or as part of the development of the Ninth Lock Framework site to ensure that links through the site from the village towards the train station and elsewhere are integrated into the development.
SD-C367-142 Jamie Nolan	A submission disagrees that the proposed permeability routes will improve the traffic issues in Clondalkin and suggests that a 2-way traffic system in the village might be the solution. A submission states that they do not believe opening permeability routes to save a few minutes is worth the disturbance it will cause to residents. A number of submissions do not believe that the proposed permeability links will improve commutes and indicate that there are existing alternatives to the proposed links. Some question the	The concern that the proposed introduction of the permeability routes has raised amongst residents in and around the village, and the stated reasons for them, is acknowledged. However, this must be balanced with the need to reduce traffic congestion, to create safe pedestrian and cycle environments which can shorten routes to schools and to different areas within the wider village, the potential environmental benefits in reducing emissions and
SD-C367-158 Christopher Conway		
SD-C367-143 Brian Ronan		

	basis for the links or the limited time they would save if at all. One submission notes that the proposal for a floodlit, ecologically destructive, legally fraught cut-through in a graveyard is the antithesis of DZ Designation.	encouraging more healthy ways to move around what are generally short distances. It is considered that account of the concerns with anti-social behaviour including the use of e-scooters will be capable of being addressed through the following objectives within the Draft LPF (underlining added in this response): SM4 Objective 1: To support the permeability routes and links identified in Figure 5.9 and Table 5.4, <u>subject to further consultation</u>, which will enable quicker and safer access to schools, shops, places of work and social interaction in a pedestrian and cycle friendly environment. SM4 Objective 2: To ensure that proposed permeability links are designed in line with the NTA's best practice guidance and <u>in such a way as to reduce the potential for anti-social behaviour</u>, providing wide and inviting openings which are well lit SM5 Objective 1: To deliver the identified priority permeability routes, <u>subject to local consultation</u>, to facilitate improved connections to schools, increasing the safety of children currently using active travel and providing improved options for children and their parents / guardians currently travelling by car to switch to walking or cycling. SM5 Objective 2: To encourage permeability improvements in general, including those identified as secondary permeability links, at suitable locations <u>following appropriate consultation</u>, throughout the Plan area.
--	---	--

		SM5 Objective 4: <i>To engage with the community prior to any formal Part 8 or related process to facilitate consultation on proposed new links and their design.</i> The proposed permeability routes are an important element of a package of measures to try and improve the wider environment for walking and cycling in Clondalkin, facilitate improved public transport, improve general safety for those using the roads and footpaths, helping to resolve the congestion issues in Clondalkin. Further consultation prior to any implementation of proposed permeability links will examine in detail issues around anti-social behaviour, access issues, design of the proposed route, environmental / site suitability. The purpose of what is included in the Plan is to identify where potential routes could go, with the opportunity of creating these permeability routes to undergo additional public consultation at a later stage. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill SD-C367-146 Victor Madden	Permeability - General The submission raises the following queries in relation to permeability measures (creating alleyways/opening existing pathways) for pedestrian and cyclists: – Will the council consult with An Garda Síochána to gain written assurance that the proposed alleyways/pathways will not hinder the work of An Garda Síochána? – Will the council install public lighting and security cameras along new alleyways/pathways? If installed this will	CE Response: The content of this submission is noted. As highlighted in Chapter 5's permeability section, additional public consultation is required before any permeability link is provided. This process will include working with An Garda Síochána to directly engage with the wider community and provide insights to design and anti-social behaviour in the area. As highlighted in the Draft LPF, the additional public consultation will deal with design and lighting of particular permeability links, with the process aiming to minimise any alterations to character.

	change the character of the Slí Mhór for example. – Will the council liaise with An Garda Síochána to ensure permeability proposals do not increase anti-social behaviour? Another submission states that all road and cyclist users must follow the Rules of The Road and supervision by the guards is essential. Asks have the guards been contacted?	CE Recommendation: No change to Draft LPF.
SD-C367-94 Transport Infrastructure Ireland	Permeability - SM4 Objective 1 TII recommends the following changes to SM4 Objective 1; To support the permeability routes and links identified in Figure 5.9 and Table 5.4, subject to further consultation, <i>and compliance with TII publications or DMURS as appropriate</i>, which will enable quicker and safer access to schools, shops, places of work and social interaction in a pedestrian and cycle friendly environment.	CE Response: The content of the submission is noted. The Draft LPF will be introduced to the County Development Plan (CDP) through a Variation. All existing policies and objectives within the CDP will continue to apply and do not require to be repeated in the focused objectives of the LPF. As provided for in the CDP, all policy and objectives are compliant with TII publications and DMURS. These are provided for in SM5 Objective 2 (DMURS) and SM6 Objective 4 (TII publications). In addition, the Draft LPF includes SM4 Objective 2 to ensure that the proposed permeability links are designed in line with the NTA's best practice guidance. It is considered that this is the most relevant guidance in this instance to support SM5 Objective 2 (DMURS) and SM6 Objective 4 (TII publications) already in the County Development Plan. CE Recommendation: No change to Draft LPF.

Existing Permeability Link - Floraville / Coláiste Bríde		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-25 NIALL Fagan	The Floraville-Coláiste Bríde Existing Permeability Route is referred to as Per 4 by many of the submissions.	CE Response: The contents of the submissions are noted. The subject of the submissions, referred to as Per 4 in the Local Transport Plan and referenced as such in many of the submissions, relates to an existing permeability link between Floraville estate and Coláiste Bríde Secondary School.
SD-C367-16 Eimear BUTLER	One submission notes that the reference in LPF document to St Brigid's Secondary school needs to be corrected to Coláiste Bríde.	
SD-C367-24 Colm Carberry	Issues raised in the submissions fall broadly under the following categories: - Safety Concerns for all but especially elderly and young children - Security and Crime - Privacy and Noise - Loss of Character Multiple submissions argue that the proposed permeability links including this one at New Road facilitating access between Floraville and Coláiste Bríde raises serious concerns around safety (speeding on e-scooters and e-bikes), privacy, safeguarding, and environmental impact. The proposals disregard the estate's original cul-de-sac design, lack proper consultation, and risk increasing anti-social behaviour, traffic disruption and harm to local biodiversity. These submissions urge the Council to remove these routes and explore other alternatives which respect the integrity of established communities.	 <i>Image extracted from Figure 5.9 of the LPF, highlighting the existing permeability route between Floraville Estate and Coláiste Bríde Secondary School.</i> The Draft Local Planning Framework has identified this route in the legend of Figure 5.9 on page 49 of the document as 'Existing Permeability Links', identified in a yellow colour. There is no proposal to alter or change the existing arrangements for the link between Coláiste Bríde and Floraville Estate, acknowledging there is a gate in place which is closed after school each evening by the caretaker of
SD-C367-27 Adam Byas		
SD-C367-28 Wayne McGuire		
SD-C367-30 James Mullins		
SD-C367-34 anita Broderick		
SD-C367-35 James Rawl		
SD-C367-36 Kathleen Phelan		
SD-C367-37 Angela McGreevey		
SD-C367-39 Oliver Murray		
	Impact on adjoining properties	

SD-C367-43 Ian Wallace	A number of submissions note that residential homes directly back onto the school grounds. The creation of a permanent public laneway in this location would not only affect the school's safeguarding protocols but also compromise the privacy, security, and peace of adjacent households. Residents may face increased noise, foot traffic, and exposure to anti-social behaviour and criminality, with no clear mitigation measures outlined in the draft framework.	the school. The provision of this existing link creates opportunities for students and parents to walk / cycle to school within the LPF area. This has been included in figure 5.9 where a number of existing routes already facilitating increased permeability, and which go towards a network of existing and proposed links, are shown on the map.
SD-C367-46 Toni Irvine	Submissions also note that the laneway at Coláiste Bríde was closed in the 1990's outside of school hours due to anti-social activity.	Given that the route is existing and that there is no proposal to change the opening times outside those currently in place, the concerns raised in many of the submissions around an unrestricted opening of the route are generally overcome.
SD-C367-47 Carol Fagan		
SD-C367-49 Anthony Taylor		
SD-C367-51 Brian Kirk	Questions need for Proposed Routes	On issues which raised wider concerns on permeability, the Draft LPF has been subject to SEA, the rationale for the proposed permeability routes has been set out in the draft Plan, noting that this is an existing route, and it is not considered that there are any policy conflicts. The Draft LTP includes an objective to design any proposed routes in accordance with the NTA's best practice guidance.
SD-C367-52 Alan Fagan	A number of submissions question whether the proposed permeability routes will improve connectivity and reduce car dependency and argue that the benefits remain speculative. They note also that no clear evidence has been provided to demonstrate that these routes will achieve their intended outcomes without compromising community safety.	
SD-C367-54 Cllr Francis Timmons		
SD-C367-62 Alex McDaid		
SD-C367-63 David Tyrrell	One submission notes the importance and cost of post-implementation and points out that safety measures are often neither practical nor effective and can place a considerable financial burden on taxpayers.	The existing link between Coláiste Bríde and Floraville Estate is simply shown, alongside other existing links, on Figure 5.9 of the draft LPF to show how different connections work and how proposed connections could further link in. The removal in Figure 5.9 of the existing permeability route between Floraville Estate and Coláiste Bríde would not change the current situation where the route is gated but opened during school hours.
SD-C367-67 Patricia Lysaght		It is considered that the existing route should remain mapped on Figure 5.9 of the LPF, noting that the draft LPF has no proposals to change the current arrangements around
SD-C367-68 Ann Carroll	One submission states that the opening of the existing laneway during school hours is already causing traffic problems. Another submission indicates that the existing permeability route marked in orange along Floraville Avenue does not exist.	
SD-C367-78 Raphael Ryan		

SD-C367-82 Kathy O'Sullivan	One submission states that insufficient evidence for need of these links has been established while ignoring the existing evidence of links previously having to be closed and states that as a result there are policy conflicts:	its opening and that it is correctly marked on the map as existing.
SD-C367-84 ben minogue		The submission indicating that reference in LPF document to St Brigid's Secondary school needs to be corrected to Coláiste Bríde is acknowledged and agreed.
SD-C367-87 Ian Kelly	• <i>Strategic Environmental Assessment (SEA) Directive</i> – requires past evidence and cumulative impacts to be considered. • <i>Planning and Development Act 2024</i> – requires strategies to support proper planning and sustainable development.	CE Recommendation:
SD-C367-88 Vera Rogers		No change to the inclusion of the existing permeability link marked in yellow between New Road / Coláiste Bríde and Floraville Estate on Figure 5.9 of the Draft LPF.
SD-C367-97 Terry McNally	Traffic and Road Safety Issues- Established cul-de sacs	Amend references to St Brigid's Secondary school to Coláiste Bríde.
SD-C367-106 john Curran	The estate has been here for nearly 60 years and was established without these connections and associated speeding of electric scooters and other vehicles on and off footpaths in addition to heavy pedestrian traffic. The residents of the area are mostly elderly and have mobility issues. The proposed permeability openings would turn Floraville Ave into a mini Highway with 24 Hour traffic and create gridlock. This would include Black clad hooligans riding Quad bikes, motorbike, scramblers and electric bikes and scooters up and down the road and footpaths at all hours of the day and night.	
SD-C367-107 Derek O Kelly		
SD-C367-117 Teresa Farry Roberts		
SD-C367-121 Cllr Linda de Courcy		
SD-C367-146 Victor Madden	Submissions also note that Floraville was intentionally designed as a cul de sac to foster a quiet, secure and a community oriented environment. This proposal would fundamentally alter this character and compromise security and privacy that residents have reliant on for decades.	
SD-C367-149 Noel Carberry		

SD-C367-152 Alan Banks	A number of submissions note that they specifically bought houses in a cul de sac for security and safety reasons and do not want that to change.	
SD-C367-179 Margueritte Sherry	One submission also notes that proposals are in conflict with the following policy documents.	
SD-C367-19 Deirdre Gardiner	• <i>DMURS & NTA Permeability Best Practice Guide</i> – permeability should improve safety and street function. • <i>Planning and Development Act 2024</i> – requires protection of residential amenity. • <i>IHREC Act 2014</i> – requires safe, inclusive access for all. • <i>Climate Action and Low Carbon Development (Amendment) Act 2021</i> – requires reductions in car dependency and emissions.	
SD-C367-8 Cllr Francis Timmons		
SD-C367-70 bridget connaughton		
SD-C367-73 James Smith		
SD-C367-65 David Tyrrell	Anti-Social Behaviour General Multiple submissions note that Clondalkin has experienced persistent issues with anti-social behaviour which is reflected in community safety reports and garda statistics. Introducing new accesses risks exacerbation of disruptive behaviour and criminal activity. Notes that the plan priorities movement of people rather than needs of residents. The Floraville Estate is a quiet area made up of older residents with mobility issues who fear anti-social behaviour.	
SD-C367-235 Floraville Residents		
SD-C367-201 Ryan Family		
SD-C367-168 James Wynne		
SD-C367-138 Paul Gogarty TD	Impacts - Increase fear of burglary and burglary - Speeding by motorised cycle vehicles causing safety issues	

SD-C367-32 Susan McDonagh	- Increase noise levels 24/7 - Lead to vandalism - Decrease Security and standard of living - Increase footfall - Put pressure on An Garda Síochána - Diminish Community Wellbeing - Increased vandalism Historic Closure of Laneways A number of submissions note that this laneway was closed outside of school hours in the 1990's due to anti-social behaviour such as those referenced above. A number of submissions note that they specifically bought houses in a cul de sac for security and safety reasons and do not want that to change. One submission notes that there are ongoing anti-social activities in Clondalkin Village including violent incidents and break ins. It goes on to state that safety concerns are not historic; they are immediate. It goes on to state that within this environment opening new cut-throughs into Floraville would expose families to further risks and reintroduce the very issues that led to closures in the past. The proposals therefore are in conflict with the following policy document. The submission also points out that fear of crime is as important as crime itself. A number of submissions from elderly residents state they fear for their safety should these laneway links be opened.	
----------------------------------	---	--

	• <i>DMURS / CPTED</i> – design should prevent conditions that enable crime and fear of crime. • <i>Public Sector Duty (IHREC Act 2014)</i> – requires councils to protect vulnerable groups in practice, not just in principle. A petition signed by 317 residents of the Floraville Estate states the following; <i>'We the residents of Floraville Estate, Clondalkin object to the opening/reopening of walkways through Floraville. Walkways were previously closed due to anti-social behaviour. We believe re-opening them or opening new ones will incentivize anti-social behaviour in our quiet and peaceful estate.'</i> Lack of Emergency Service Consultation One submission notes that there is no evidence that the Council consulted emergency services. The submission notes that unregulated access points can complicate emergency response logistics, especially in estates with elderly or vulnerable populations. Ignoring community feedback and lack of consultation with the public A number of submissions state that there has not been enough consultation with the community and one submission notes that resident's associations from Floraville, Monastery Rise, St Brigid's, and others have submitted coordinated objections to SDCC, citing fears of estates becoming "rat runs" and expressing concern over traffic and safety. Ignoring this collective feedback undermines the participatory planning process. A small number of submissions note	
--	---	--

	that documentation refers to three previous consultations. They indicate that they nor anyone they know was made aware of these consultations. Absence of Environmental Impact Assessment One submission notes that there is no evidence that SDCC has conducted an environmental or noise impact assessment for the proposed permeability routes which will result in increased footfall, traffic, and disruption could negatively affect local biodiversity, air quality, and ambient noise levels—especially in a quiet residential estate like Floraville. The submission notes that bats have been observed within the estate, indicating the presence of nocturnal wildlife that may rely on dark corridors for commuting and foraging. The submission notes that the proposals could significantly affect these bat roosts, feeding patterns and flight paths particularly due to any additional lighting in treelines or hedgerows. Climate Action Climate Action and other benefits Submission states that we are facing a climate crisis it is essential that we support sustainable movement in every possible way. Permeability improvements are essential for those with disabilities and mobility issues. Submission states they do not believe that increasing walkability and permeability would increase the level of antisocial activity in these areas rather it would have the opposite effect with higher footfall making the area feel more active.	
--	--	--

	A number of councillors have made submissions supporting the concerns raised by the residents of Floraville in their submissions.	
--	---	--

Priority Permeability Link - Floraville/Round Tower GAA Club and Secondary Permeability Link Floraville / Laurel Park		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-25 NIALL Fagan SD-C367-10 David Tyrrell SD-C367-15 Eileen Keany SD-C367-27 Adam Byas SD-C367-28 Wayne McGuire SD-C367-33 Robert Dillon SD-C367-35 James Rawl SD-C367-36 Kathleen Phelan SD-C367-37 Angela McGreevey SD-C367-38 Maeve Ui Mhairtin	Issues Raised in Common to the Permeability Routes Common issues raised around the permeability routes (Floraville Avenue to the Round Tower GAA grounds (Per 3) and Floraville Avenue to Laurel Park (Per 2) are summarised below and are followed by a summary of issues specific to each and to issues raised on the Round Towers GAA grounds to Knockmeenagh Lane (Per 16 and Per 19): Multiple submissions argue that the proposed permeability links raise serious concerns around safety (speeding on e-scooters and ebikes), privacy, safeguarding, and environmental impact. The proposals disregard the estate's original cul-de-sac design, lack proper consultation, and risk increasing anti-social behaviour, traffic disruption and harm to local biodiversity. These submissions urge the Council to remove these routes and explore other alternatives which respect the integrity of established communities. <i>Questioning the need for Proposed Routes</i>	CE Response: Three permeability routes were identified in the LPF going through Floraville. These are the: - Existing Permeability Route to Scoil Bride referenced in many submissions as Per 4 and responded to above. - Priority Permeability Route from Floraville Avenue to the Round Tower GAA club grounds referenced in many submissions as Per 3 and shown in below extract from Figure 5.9 of the LPF as the short east-west pink line and arrow circled with the related priority permeability route through the GAA and SIAC lands running north-south;

SD-C367-42 Bernadette Brennan SD-C367-43 Ian Wallace SD-C367-46 Toni Irvine SD-C367-47 Carol Fagan SD-C367-49 Anthony Taylor SD-C367-50 Linda Hegarty SD-C367-52 Alan Fagan SD-C367-63 David Tyrrell SD-C367-68 Ann Carroll SD-C367-77 Mick Hallows SD-C367-78 Raphael Ryan	Multiple submissions question whether the proposed permeability routes will improve connectivity and reduce car dependency and argue that the benefits remain speculative. They note also that no clear evidence has been provided to demonstrate that these routes will achieve their intended outcomes without compromising community safety. One submission notes the importance and cost of post-implementation and points out that safety measures are often neither practical nor effective and can place a considerable financial burden on taxpayers. A submission states that without clear rationale, supporting evidence, or demonstration of community benefit, the proposal appears unnecessary and unjustified, especially given the risks to existing residents. Another submissions states that insufficient evidence for need of these links has been established while ignoring the existing evidence of links previously having to be closed and states that as a result there are policy conflicts: - <i>Strategic Environmental Assessment (SEA) Directive</i> – requires past evidence and cumulative impacts to be considered. - <i>Planning and Development Act 2024</i> – requires strategies to support proper planning and sustainable development.	 And • Secondary Permeability Route from Floraville Avenue to Laurel Park referenced in many submissions as Per 2, and shown in below extract from Figure 5.9 of the LPF as a blue dashed line and arrow 
--	--	---

SD-C367-79 Barry Spierin	- <i>DMURS & NTA Permeability Best Practice Guide</i> – permeability should improve safety and street function.	It should be noted that a further route, referenced in some submissions as Per 5 from Monastery Rise to the green at Floraville Lawns, identified in the Local Transport Plan, was not brought forward into the LPF. Issues Raised in Common Permeability can be described as the extent to which an urban area permits the movement of people by walking or cycling and is concerned with providing a competitive advantage to these ways of getting around. As part of the preparation of the LPF, a Local Transport Plan (LTP) was undertaken to provide an evidence-based analysis of the existing travel patterns and mode share (how people travel) alongside demand analysis, transport infrastructure and land use. This was further informed by three rounds of public consultation, the last round of which the preferred options were put forward to reach a general consensus on the options. The preferred transport plan arising from this process, set out in section 6 of the LTP, went on to inform the Local Planning Framework (LPF). The vision for the LTP, aligning with the vision of the Local Planning Framework is to: <i>‘increase the number of people walking, cycling and using public transport and reduce the need for car journeys, resulting in a more active and healthy community, a more attractive public realm, safer streets, less congestion, reduced carbon emissions, better air quality, quieter neighbourhoods and a positive climate impact.</i>
SD-C367-80 Helen Molony	- <i>IHREC Act 2014</i> – requires safe, inclusive access for all.	
SD-C367-82 Kathy O’Sullivan	- <i>Climate Action and Low Carbon Development (Amendment) Act 2021</i> – requires reductions in car dependency and emissions.	
SD-C367-83 Annette and Roger Molony	A number of submissions also note that the opposition of the local community has already been registered when it was raised earlier in 2025	
SD-C367-84 ben minogue	<i>Traffic and Road Safety Issues - Established cul-de sacs</i>	
SD-C367-86 Angela Lyons	Floraville estate has been here for nearly 60 years and was established without these connections and associated speeding of electric scooters and other vehicles on and off footpaths together with heavy pedestrian traffic.	
SD-C367-87 Ian Kelly		
SD-C367-88 Vera Rogers	A submission argues that the proposed permeability openings would turn Floraville Ave into a mini Highway with 24 Hour traffic and create gridlock. This would include Black clad hooligans riding Quad bikes, motorbike, scramblers and electric bikes and scooters up and down the road and footpaths at all hours of the day and night. Another submission notes that proposals presented as improving safety will make the existing situation far more dangerous.	
SD-C367-92 Brenda Cahill		
SD-C367-93 Caroline Mannion		
SD-C367-97 Terry McNally		
SD-C367-106 john Curran	A number of submissions note that they specifically bought houses in a cul de sac for security and safety reasons and do not want that to change, that	

SD-C367-107 Derek O Kelly	Floraville was intentionally designed as a cul de sac to foster a quiet, secure and a community-oriented environment. This proposal would fundamentally alter this character and compromise security and privacy that residents have reliant on for decades.	The need to reduce congestion was an ongoing issue at public consultation. Table 5.3 in the LPF sets out the top ten origin-destination of local trips (by car originating within the Plan area) showing the impact of school journeys.
SD-C367-110 tom murphy		Acknowledging that significant changes to road circulation to reduce overall congestion was not acceptable to the public, the Local Planning Framework took the package of preferred measures set out in the Local Transport Plan to create a cohesive approach to supporting more sustainable forms of movement. This involved objectives around permeability to help people move between places as easily as possible, providing a safe alternative to driving shorter distances for those who would like to. The package of measures also includes public realm improvements, pedestrian crossings at key locations, safety initiatives for cycling and walking and more Safe Routes to Schools and lower speed limits.
SD-C367-117 Teresa Farry Roberts	A number of submissions state that this link will increase noise and disruption for residents and particularly older persons who are already scared to venture outdoors as evening get darker. These people have paid taxes, mortgages etc over a lifetime and are entitled to quiet enjoyment of the home in their later years. A number of submissions from elderly residents state they fear for their safety should these laneway links be opened.	
SD-C367-118 James Whelehan		
SD-C367-119 Brian Chapman		
SD-C367-121 Cllr Linda de Courcy	<i>Anti-Social Behaviour - General</i> Multiple submissions note that Clondalkin has experienced persistent issues with anti-social behaviour which is reflected in community safety reports and garda statistics. Introducing new accesses risks exacerbation of disruptive behaviour and criminal activity. Notes that the plan priorities movement of people rather than needs of residents. The Floraville Estate is a quiet area made up of older residents with mobility issues who fear anti-social behaviour.	Taken together, these measures will, by facilitating alternatives to the car where that is appropriate for people, help towards reducing congestion and the dominance of the car in the village centre, contribute towards a reduction in carbon emissions and associated pollution, improve walking and cycling and public transport connectivity, improve the safety of the transport network for end users, and provide better and safer routes and access to schools.
SD-C367-126 Claire Hughes		
SD-C367-128 Colin Lawler		
SD-C367-146 Victor Madden		
SD-C367-149 Noel Carberry	The link will reduce the safety of motor vehicles and houses and reduce their value.	This sustainable approach supports proper planning and development (Planning and Development Acts), the aims of the Climate Action and Low Carbon Development Act 2015 (as amended), DMURS and the NTA Permeability Best Practice Guide. The Irish Human Rights and Equality Commission Act 2014 places a statutory obligation on public bodies to have regard to human rights and equality
SD-C367-152 Alan Banks	Multiple submissions list potential anti- social behaviour impacts, and question why create problems when there are none. The laneways will not reduce walking or travel time.	

SD-C367-169 John Loughnan	Anti - social Impacts specifically referenced;	considerations in the performance of their functions. SDCC has produced a Public Sector Equality and Human Rights Duty Framework under section 42 of this Act, and it is considered that there is no conflict with this and the permeability measures, noting also that any permeability measures will be subject to further consultation and the NTAs Best Practice guidance as set out in the relevant objectives within the LPF.
SD-C367-179 Margueritte Sherry	- Increase fear of burglary and burglary - Speeding by motorised cycle vehicles causing safety issues - Increase noise levels 24/7 - Lead to vandalism - Decrease Security and standard of living - Increase footfall - Put pressure on An Garda Síochána - Diminished Community Wellbeing	The issue of costs and the manner in which to best address any issues of potential safety issues and / or anti-social behaviour, emergency access will be considered at project stage, having examined the requirements to meet best practice and following further engagement with local communities and relevant stakeholders.
SD-C367-180 Mark Goodwin		
SD-C367-194 Catherine BERRY-BYRNE		
SD-C367-196 Nuala Burke	<i>Historic closure of Laneways and anti- social behaviour</i>	
SD-C367-198 Andrew Kenny	Multiple submissions note that three Laneway links were closed in 1995 due to community concerns ongoing issues since 1972 due to the existence of the links. These all stopped when the links were closed.	The LPF makes clear that consultation with communities within which the permeability measures are proposed will be undertaken <u>before</u> implementing any proposed measures. This is specifically referenced in the objectives of the LPF including:
SD-C367-114 Michael McCabe	- Illegal dumping - Vandalism - Banging on glass and Breakage of windows - Use of area by mopeds, motorbikes and horses. - Groups of young people gathering and anti-social behaviour. - Lanes being used as public toilet - Back wheel of tractor smashing into a garden - Increased footfall	<u>SM4 Objective 1</u> looks to ‘ <i>support the permeability routes and links identified in Figure 5.9 and Table 5.4, <u>subject to further consultation</u>, which will enable quicker and safer access to schools, shops, places of work and social interaction in a pedestrian and cycle friendly environment</i> ’.
SD-C367-75 David Stokes		
SD-C367-76 Joan and Eugene Tully		
SD-C367-62 Alex McDaid		A number of submissions, including a petition, highlighted concerns with the potential for anti-social behaviour and pointed out that cul-de-sacs / lanes were previously closed for this reason. Submissions also highlighted concerns around, safety, increased traffic, environmental concerns and impact on property values. It is acknowledged that some
SD-C367-61 Una O'Brien	Opening of laneways will re-introduce these problems and more given the amount of drug use today.	

SD-C367-41 Paula Dillon	A submission notes that there are ongoing anti-social activities in Clondalkin Village including violent incidents and break ins. It goes on to state that safety concerns are not historic; they are immediate and that within this environment opening new cut-throughs into Floraville would expose families to further risks and reintroduce the very issues that led to closures in the past. The submission also points out that fear of crime is as important as crime itself. The proposals therefore are in conflict with the following policy document. - <i>DMURS / CPTED</i> – design should prevent conditions that enable crime and fear of crime. - <i>Public Sector Duty (IHREC Act 2014)</i> – requires councils to protect vulnerable groups in practice, not just in principle. A petition signed by 317 residents of the Floraville Estate states the following; 'We the residents of Floraville Estate, Clondalkin object to the opening/reopening of walkways through Floraville. Walkways were previously closed due to anti-social behaviour. We believe re-opening them or opening new ones will incentivize anti-social behaviour in our quiet and peaceful estate.' <i>Lack of Emergency Service Consultation</i> One submission notes that there is no evidence that the Council consulted emergency services. The submission notes that unregulated access points can complicate emergency response logistics, especially in estates with elderly or vulnerable populations.	links which had originally existing were blocked up in the 1990s following anti-social behaviour.
SD-C367-39 Oliver Murray		Since that time, there is increasing recognition of the on-going changes to our way of life being faced through the impacts of climate change, the increase in traffic through a growing population and car ownership and our increasingly sedentary lifestyle creating additional pressures for our health system.
SD-C367-34 anita Broderick		
SD-C367-30 James Mullins		Having regard to these pressures, there is a need for wider planning measures and transport planning in particular to respond as best it can. This includes facilitating to the extent possible measures to provide people with alternatives to the car, delivering better connections within and between local places and communities, public transport and schools.
SD-C367-24 Colm Carberry		
SD-C367-16 Eimear BUTLER		
SD-C367-19 Deirdre Gardiner		As part of any design proposal the issues of safety, anti-social behaviour including crime, and traffic will be considered and consulted on, as included for in the LPF through the following objectives:
SD-C367-8 Cllr Francis Timmons		SM4 Objective 2, which seeks to ' <i>ensure that proposed permeability links are designed in line with the NTA's best practice guidance and in such a way as to reduce the potential for anti-social behaviour, providing wide and inviting openings which are lit</i> '.
SD-C367-120 Tom Pitts		As identified in SM5 Objective 1 and 4 (underlining added in response);
SD-C367-70 bridget connaughton		' <i>SM5 Objective 1: To deliver the identified priority permeability routes, <u>subject to consultation</u>, to facilitate</i>
SD-C367-73 James Smith		

SD-C367-65 David Tyrrell	<i>Absence of Environmental Impact Assessment</i> One submission notes that there is no evidence that SDCC has conducted an environmental or noise impact assessment for the proposed permeability routes. Increased footfall, traffic, and disruption could negatively affect local biodiversity, air quality, and ambient noise levels—especially in a quiet residential estate like Floraville. Notably, bats have been observed within the estate, indicating the presence of nocturnal wildlife that may rely on dark corridors for commuting and foraging. The submission notes that the proposals could significantly affect these bat roosts, feeding patterns and flight paths particularly due to any additional lighting in treelines or hedgerows.	<i>improved connections to schools, increasing the safety of children currently using active travel and providing improved options for children and their parents / guardians currently travelling by car to switch to walking and cycling’; and</i>
SD-C367-89 Michael O'Donnell		<i>‘SM5 Objective 4: <u>To engage with the community prior to any formal Part 8 or related process to facilitate consultation on proposed new links and their design’.</u></i>
SD-C367-235 Floraville Residents		The adopted County Development Plan also supports permeability. H7 Objective 3 supports permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling, having regard to NTA best practice guidance, including provisions relating to permeability schemes and anti-social behaviour.
SD-C367-201 Ryan Family		SM2 Objective 4 of the County Development Plan also looks for additional consultation, mentioning while permeability for increased access to local shops, schools, public transport and other amenities is important, it should <i>‘also take account of existing patterns of anti-social behaviour in the removal of such barriers with <u>due consideration of consultation with local residents where need is evident or expressed</u>’</i>. SDCC are aware of this and have noted that detailed consultation is required. SM2 Objective 7 also makes reference to promoting walking and cycling trips to schools, ensuring there are multiple access points to school sites and <i>‘<u>prioritising routes for permeability projects and provide enhancement of pedestrian and cycle ways</u>’</i>.
SD-C367-168 James Wynne		<i>Environmental Assessments</i> A submission indicates that there are policy conflicts with the Strategic Environmental Assessment which requires past evidence and cumulative impacts to be considered. The SEA
SD-C367-138 Paul Gogarty TD	<i>Ignoring community feedback and lack of consultation with the public</i> A number of submissions state that there has not been enough consultation with the community and one submission notes that resident’s associations from Floraville, Monastery Rise, St Brigid’s, and others have submitted coordinated objections to SDCC, citing fears of estates becoming “rat runs” and expressing concern over traffic and safety. Ignoring this collective feedback undermines the participatory planning process. A small number of submissions note that documentation refers to three previous consultations. Submissions point out that they or anyone they knew were made aware of these consultations.	
SD-C367-32 Susan McDonagh		
SD-C367-150 Mia Colgan		
SD-C367-29 Emma McGuire		
SD-C367-31 Kim McCoy		
	<i>Climate Action and other benefits</i>	

SD-C367-40 Ciara Brennan SD-C367-48 Paul Malone SD-C367-51 Brian Kirk SD-C367-59 Alan Warren SD-C367-67 Patricia Lysaght	Submission states that we are facing a climate crisis it is essential that we support sustainable movement in every possible way. Permeability improvements are essential for those with disabilities and mobility issues. Submission states they do not believe that increasing walkability and permeability would increase the level of antisocial activity in these areas rather it would have the opposite effect with higher footfall making the area feel more active. A number of councillors have made submissions supporting the concerns raised by the residents in their submissions. Specific Issues Related to the Priority Permeability Route between Floraville Avenue and Round Towers GAA club grounds (Per 3) In addition to the issues raised above specific issues raised on this route were: <i>Floraville Avenue- Car Parking and traffic concerns</i> A number of submissions raise concerns that Floraville Avenue will become an overflow car park for the GAA club, blocking entrances and reducing security. This is in addition to the area already experiencing hassle from parents parking in the estate during school drop off and pick up hours and increasing through traffic. This has already necessitated the introduction of metered parking and double yellow lines to address the existing unauthorised parking. Submissions also argue that additional problems will occur during match days.	Environmental Report accompanied the Variation on public display. The Environmental Report was prepared in accordance with the relevant guidelines and legislation and includes baseline analysis and an analysis of cumulative impacts. No policy conflict was identified. A submission also raised concern that there may be bats in the vicinity which could be impacted by any proposed new opening. This can be assessed by a qualified professional at project stage should it be required and the outcome of that assessment would feed into the design and / or appropriateness of the proposal. Specific Issues Related to the Priority Permeability Route between Floraville Avenue and Round Towers GAA club grounds (Per 3) This permeability link is identified as a Priority Permeability Route in the LPF, the objective for which is: SM5 Objective 1: <i>To deliver the identified priority permeability routes, subject to local consultation, to facilitate improved connections to schools, increasing the safety of children currently using active travel and providing improved options for children and their parents / guardians currently travelling by car to switch to walking or cycling.</i> The submissions around the potential for this permeability route to facilitate overflow car parking for the GAA club is noted. It is considered that this could be overcome by appropriate road marking and metering if required. The existing entrance to the GAA grounds would continue to be the main entrance, catering as it does for vehicular traffic
---	---	--

	<i>Walking distance to GAA Pitch-Monastery Road</i> <i>Access: No Need for proposed link</i> One submission notes that in addition to increasing volumes of traffic congestion and pedestrian footfall in Floraville, that permission was granted to the GAA pitches with access off the Monastery Road and notes that SDCC had done admirable work in improving pedestrian crossings, signage and width of footpaths. On this basis this should remain the main access for GAA pitches. The road improvements indicate that there should be no need for the proposed link as pedestrian and cycle movements have already been supported on Monastery Road. Monastery Road remains the best way to travel to the village so opening up routes in Floraville will not encourage walking or cycling. One submission notes that the opening of a link from Floraville to the GAA pitch car park will not reduce walking distance. The submission argues that it is longer to go through the estate (372m) than along Monastery Road (354m). The existing permeability route marked in orange along Floraville Avenue does not exist. The submission questions where it is going to and states 'very misleading to go through Knockmeenagh Lane through Floraville will save 22m (921m v943m) and will upset all the residents' Another submission states that it is shorter to go straight through the GAA grounds to Monastery Road than to go through Floraville and it's only saving	and car park within the grounds. The proposed permeability link from Floraville would facilitate those coming by foot and cycle from areas to the east of Floraville avoiding their need to go as far as Monastery Road to gain access. The link to the GAA grounds is intended to serve as part of a wider network of links to help connect different residential areas to schools and each other as well as to the village. This can be seen in Figure 5.9 of the LPF which shows how the proposed routes, alongside existing routes, could facilitate a better connected local area, accessible by walking and cycling. Therefore, depending on where the destination is, this link will combine with others to make safer journeys which are generally shorter. Specific Issues Related to the Secondary Permeability Route between Floraville Avenue and Laurel Park (Per 2) This route is identified in the LPF as a secondary route, the related objective states: SM5 Objective 2: <i>To encourage permeability improvements in general, including those identified as secondary permeability links, at suitable locations following appropriate consultation, throughout the Plan area</i> The issues related to car parking and traffic at school time and around the creche are noted as is the concern that the proposed link between Floraville and Laurel Park will increase the volume of pedestrians and cars. The intention of the link is to help reduce the need for children to be driven to school but it is understood that this is not always possible. Traffic management measures would be introduced should car parking at school times increase, recognising that there are concerns that this would occur in
--	---	--

	approx 20 m, to go from Knockmeenagh to New Road. No actual benefit but a lot of inconvenience. Concern also that links will facilitate increased through traffic by car, foot and bicycle. Concern about the safety of people accessing the GAA pitches at night as it is an isolated area. A number of submissions also state that the village is small enough that people can easily get around on foot without cutting through laneways. A submission notes that there was never a permeability link at this location. Specific Issues Related to the Secondary Permeability Route between Floraville Avenue and Laurel Park (Per 2) In addition to the issues raised above specific issues raised on this route were: <i>Increase in Traffic</i> This area of Floraville is currently subject to large volumes of pedestrian and vehicle traffic daily due to the access lane to schools. This already leads to huge congestion in the estate in the morning and afternoon during the school year. Opening the closed area between Floraville and Laurel Park will only increase the volume of pedestrians and cars in the area. Also, it poses a safety hazard as children and parents show a	Laurel Park as well as Floraville. Issues around parking for the creche at the junction with Monastery Road are noted and would be taken into consideration as part of delivery of the link. Links proposed in the LPF, including this one, are not just to serve immediately adjacent residential estates but to serve wider accessibility. For example, this link would help children get from Laurel Park to Coláiste Bride more easily. Concerns around requirements to address anti-social behaviour for those living adjoining the link will be addressed as part of further public consultation and committed to within the objectives set out in the LPF, as outlined above, Priority Permeability Route between Monastery Road at Round Towers GAA grounds and Knockmeenagh Lane (Per 16) This link would provide connectivity from Knockmeenagh Lane through SIAC and the GAA grounds to Monastery Road. Knockmeenagh Lane and Road are identified as existing permeability links on Figure 5.9 of the LPF (Per19 in the LTP). This link will become increasingly important should lands within the Knockmeenagh Framework site come forward for development. As part of any further review of those lands, the need for parks and their layouts will be examined. This is addressed within Chapter 8 of the LPF as is the potential opportunity to upgrade the cycle and pedestrian route currently there while protecting the historic integrity of the laneway (Slí). Given the longer lead in time to the development of the Knockmeenagh Lands and the different consents necessary to implement the proposed route at this location, it is considered that the permeability
--	---	---

	lack of road safety awareness and regularly step (or scoot) off the path on to the road. Another objection states that it is already a struggle to get up and down the road, because of parents collecting children from the Crèche, who double park, and with no care for residents. The road is also home to a lot of young families and their children; the proposal will be very dangerous for them. <i>Questioning Need for the Proposed Route</i> A submission points out It takes approximately 3 minutes, to walk from Laurel Park to Floraville, so the link is not needed. Another submission argues that sustainable movement objectives can be fully achieved through existing pathways without forcing a new access point through a residential cul-de-sac. <i>Anti Social Behaviour</i> Submissions from residents potentially adjoining the permeability route note that they would be left with the very real possibility of incurring the cost of having to build up their front wall to prevent it being used for people to gather and to ensure security and privacy for their family. Concerns also about having to clean their driveways and walls every day so children do not have to walk through urine and other items related to anti-social behaviour. Particular security, safety and general anti-social activity risks are raised including the risks that the proposal will create for small children who now safely play on the street. The change in character and deterioration in quality of life	route should be amended from a priority route to a strategic route. The issues around potential closure of a road around the Green Isle are outside the scope of the LPF, being outside the boundary but it is understood that TII will undertake public consultation on the proposal. Similarly, the matter of the turning issues near the Swallow are outside this process. Summary <i>Priority Permeability Route between Floraville Avenue and Round Towers GAA club grounds (Per 3)</i> - Having considered the submissions and the different issues raised throughout, it is considered that this link, identified as a Priority Permeability Route in Figure 5.9 of the LPF could be amended to become a Secondary Permeability Route. The impact of this would be that it would no longer come under SM5 Objective 1: SM5 Objective 1: <i>To deliver the identified priority permeability routes, subject to local consultation, to facilitate improved connections to schools, increasing the safety of children currently using active travel and providing improved options for children and their parents / guardians currently travelling by car to switch to walking or cycling.</i> And would instead become relevant to SM5 Objective 2: SM5 Objective 2: <i>To encourage permeability improvements in general, including those identified as secondary permeability links, at suitable locations following appropriate consultation, throughout the Plan area.</i>
--	---	--

	that the proposal will bring is highlighted. Indicating that these are predictable outcomes. A submission indicates that the lane between Laurel Park and Floraville when there previously regularly had to be cleared of broken bottles and used condoms, also residents were robbed while walking through these laneways. One submission states that the proposals will create issues similar to those experienced by residents in Dublin City Centre. Priority Permeability Route Round Towers GAA grounds to Knockmeenagh Lane (Per 16) A submission has indicated that the permanent openings from Floraville and Knockmeenagh Lane to the Naas Road have previously been closed off due to anti-social behaviour. It is noted that there are already issues on Knockmeenagh Lane going the wrong way and speeding onto Knockmeenagh Road with e-bikes and rally motorbikes using it for shortcuts. It is also noted that the lane that went out from Newlands to the Naas Road (Devils lane) has had issues and is now gated. It is requested that Knockmeenagh Lane is turned into a linear park for pedestrian and cyclists only. Other issues raised around the proposed closure for the access exit point at Green Isle which it is believed would increase traffic issues and delays. Issues are raised around a severe turn near the Swallow and it is advised to restructure it.	This would mean that it would continue to be included in Figure 5.9 and to align with National, Regional and Local policies and objectives but that its potential for delivery could be considered and reviewed over time rather than as a priority delivery. <i>Secondary Permeability Route between Floraville Avenue and Laurel Park (Per 2)</i> – To retain this permeability route as a secondary permeability route on Figure 5.9 <i>Priority Permeability Route between Monastery Road at Round Towers GAA grounds and Knockmeenagh Lane (Per 16)</i> Given the longer lead in time to the development of the Knockmeenagh Lands to the south and the different consents necessary to implement the proposed route at this location, it is considered that this permeability route should be amended from a priority route to a strategic route. CE Recommendation: To amend the route between Floraville Avenue and Round Towers GAA club grounds identified in Figure 5.9 as a Priority Permeability Route to a Secondary Permeability Route to allow for its considered review over time. To retain the Secondary Permeability Route between Floraville Avenue and Laurel Park (Per 2) as shown on Figure 5.9 To amend the route between Monastery Road at Round Towers GAA grounds and Knockmeenagh Lane identified in Figure 5.9 as a Priority Permeability Route to a Strategic Permeability Route to better reflect its potential for longer term delivery.
--	--	--

Priority Permeability Link - Monastery Heath/Woodford		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-5 Robbie Callaghan	A number of submissions were received. in objection to this proposal, with the wider community making the following points:	The contents of the submissions are noted. The subject of these submissions relates to the creation of a ' <i>Priority Permeability Link</i> ' identified in the Local Planning Framework between Woodford and the schools located on New Road and Boot Road, which requires the opening of a ' <i>barrier</i> ' located between Monastery Heath Square and Woodford estate at Woodford Road. This route was identified as Per17 in the Local Transport Plan.
SD-C367-6 Amber Tedman	Security and Safety: A number of responses highlighted the proposed permeability route would increase the level of anti-social behaviour for residents currently residing within Monastery Heath. This will create safety risks for children and older residents within Monastery Heath. It was stated that it will open up the green space in the square to antisocial activities.	
SD-C367-7 Svetlana Vomisescu	The use of e-scooters and e-bikes also increases danger on those young and old within the estate as highlighted in a number of responses. Some submissions highlighted that there would be fear of being attacked for those who live close to where the permeable link would be created. One submission states that a significant downward slope as you enter the estate from Monastery Road, as well as multiple acute corners, cyclists and scooter users would potentially / likely be travelling at significant speeds around sharp corners within the estate, which poses an extreme risk to the safety of children in the estate.	
SD-C367-9 Louise Maguire	A number of submissions stated that the increased anti-social behaviour and crime in the area will impact negatively on the mental health of people living in the area.	The purpose of this link, shown below, is to help overcome the poor connections between the east of the LPF area in Woodford to facilities and amenities in the wider village area but specifically to prioritise shorter and safer routes to schools. This link would feed into a wider permeability network which the LPF has identified, including the Round Tower grounds on Monastery Road, and would facilitate walking and cycling in lower trafficked areas, therefore improving safety and providing options to the car.
SD-C367-11 Jackie Adams	Submissions have highlighted that the estate has three green spaces and each would attract anti-social behaviour if the permeable route is opened up.	
SD-C367-12 Barbara Connolly		The rationale for having Priority Permeability Routes is set out in the LPF and reflects the fact that the top ten origin-destination vehicular trips within the LPF boundary relate to trips to schools. This has a significant impact on congestion in the village, and alongside providing healthier and safer options to movement, the permeability routes provide options to children and their parents / guardians to walk or cycle to their destination.
SD-C367-13 Paul and Fiona BOLAND		
SD-C367-14 Vicky Kealy		
SD-C367-17 Jackie McBride		
SD-C367-18 Alan Whelan		

SD-C367-21 Janis Quane	Though submissions recognised that permeability does provide many benefits, it is not something which should be forced on long-established communities, particularly those with ongoing anti-social behaviour. A number of submissions stated there is an IPAS accommodation unit located along Monastery Road, and have raised concerns with those using this accommodation transitioning through the estate to get elsewhere.	 Image extracted from Figure 5.9 of the LPF, highlighting the potential connection between Monastery Heath and Woodford Estate, which would create shorter routes to schools, with the barrier to this connection shown as a circle. The ‘<i>Permeability Best Practice Guide</i>’ (NTA, 2012) is included as an objective in the LPF, and is therefore aligning with H7 Objective 3 in the County Development Plan which states: H7 Objective 3: <i>To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling, having regard to the National Transport Authority’s Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.</i>
SD-C367-22 Darin Maguire		
SD-C367-44 Andrii Shynder		
SD-C367-45 Danny McNeive		
SD-C367-58 Derek and Linda Meagher	Loss of Privacy and Amenity: A number of submissions emphasised that the reason for moving to the estate / purchasing a house was because it had a single access point, providing a secure and private environment for the local residents. One submission had mentioned that homes 1-27 Monastery Heath Square would be affected by the proposal as these are directly along the proposed walkway, which already has narrow footpaths and does not cater for movement along the pathway appropriately.	
SD-C367-60 Alma Courtney	A number of submissions have indicated that the open walled garden layout of Monastery Heath would heavily compromise the privacy and safety for all residents. One submission included an article from the Irish Independent (22 June 2001), where it had stated that ‘Architects Fenton Simons have designed Kelland Homes new development at Monastery Heath as a village-style community, with just one entry point off Monastery Road, Clondalkin’.	
SD-C367-66 Jennifer Tracey		
SD-C367-74 Paul McKenna		
SD-C367-91 Lorraine Curtis		
SD-C367-96 Nicola Coates		
SD-C367-98 Karen Sze Man Ho	Parking and Congestion: A number of responses stated that parking is already an issue within the	

SD-C367-106 John Curran	estate, with many people parking on the path, therefore increasing the danger on pedestrian traffic further. Some responses mentioned that people will use the estate to park their cars and walk to Woodford.	It is recognised that the potential for anti-social behaviour, including safety and security, is a significant concern to the community. The NTA Guide provides examples and detail around best practice in the implementation of opening barriers to movement, the need for universal access and reducing the potential for anti-social behaviour would be included in design considerations. It is an objective within the LPF to:
SD-C367-112 Geraldine McMahon		
SD-C367-115 Liam Walsh		
SD-C367-131 Caroline Tyrrell	Environmental Impact and Biodiversity Risks: A number of submissions have stated that the creation of a permeable route through Monastery Heath will lead to unintended environmental impact and biodiversity risks as the area is currently planted with trees shrubbery and plants. This location is maintained by local residents, and the permeable route will lead to littering and disruption to local habitats. One submission stated that the permeable link could disrupt biodiversity corridors and green infrastructure which serve both ecological and amenity functions.	SM4 Objective 2: <i>To ensure that proposed permeability links are designed in line with the NTA's best practice guidance and in such a way as to reduce the potential for anti-social behaviour, providing wide and inviting openings which are well lit.</i>
SD-C367-132 Huzzel Mcneive		
SD-C367-133 Eithne Jack		In addition, a number of objectives in the LTP also make clear that local consultation with communities within which the permeability measures are proposed will be undertaken <u>before</u> implementing any proposed measures.
SD-C367-141 Troon Jack	Round Towers GAA Club Permeable Route: A number of submissions stated that a permeable route through Round Towers GAA club could still go ahead without impacting at all on the estate of Monastery Heath and in particular Monastery Heath Square.	SM4 Objective 1 looks to 'support the permeability routes and links identified in Figure 5.9 and Table 5.4, <u>subject to further consultation</u> , which will enable quicker and safer access to schools, shops, places of work and social interaction in a pedestrian and cycle friendly environment'
SD-C367-164 Andrea Lyons		
SD-C367-165 Liam Reilly	Litter and Noise: A number of responses state that litter and noise pollution will increase throughout the day, not just at school times.	There are also multiple objectives relating to the different categories of permeability routes in the LPF to ensure consultation prior to delivery:
SD-C367-166 Lynsey Jordan		
SD-C367-167 John Murphy	Property Values: A number of respondents believe that the proposed development will lower the value of their homes. One submission stated that the closure of the wall was written into their house purchase contract that it would never be opened.	SM5 Objective 1: <i>To deliver the identified priority permeability routes, subject to local consultation, to facilitate improved connections to schools, increasing the safety of children currently using active travel and providing</i>

SD-C367-179 Margueritte Sherry	Disability: One member of the community stated as a wheelchair user, that the proposed permeable link would not benefit those with disabilities, with car charging cables and sharp bends impacting those moving through the space already.	<i>improved options for children and their parents / guardians currently travelling by car to switch to walking or cycling.</i>
SD-C367-181 Ann Stapleton		<i>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.</i>
SD-C367-185 Christina Ryan	Alternative Routes: A number of responses recommended the consideration of alternative routes that do not compromise the security and wellbeing of existing residents by encouraging investment in safer pavements, lighting and designated walkways around the estate perimeter to improve connectivity. One submission has made reference that children going to school will benefit from the perspective of getting more exercise and what difference will .3km make to a journey. One submission asked the council to consider improving pedestrian and cycling routes via existing public roads, rather than forcing a connection through residential cul-de-sacs. This can be done by prioritising the enhancement of cycle lanes, enforcement of scooter regulations and other measures along Monastery Road to encourage sustainable transport.	<i>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.</i>
SD-C367-186 Gareth Doran		Potential issues around unauthorised parking can be considered at design stage with appropriate measures undertaken where they are identified as being required. Issues with existing street lighting are an operational matter which should be reported to the Public Lighting section of the Council.
SD-C367-195 Susan Egan		In addition to the three rounds of public consultation undertaken in the preparation of the LPF and the current statutory consultation for the variation, it is considered that the requirements of the Aarhus Convention and the Planning Acts have been met.
SD-C367-121 Cllr Linda de Courcy	Additional Cost: A number of responses stated that the proposed permeable route would result in additional costs to the council in terms of maintenance, enforcement or community response measures.	As highlighted during the third round of pre-draft consultation to the LPF, clarifications were provided stating that in trying to reduce congestion, no bus-gates, no additional one-way streets and no new pedestrianised streets would be included in the LPF. Instead, alternative mechanisms to help reduce congestion were brought forward, as a low intervention option, focusing on improving options for getting around without having to use the car. This included providing safe routes to schools, a reduction in
SD-C367-39 Oliver Murray		
SD-C367-69 Rachel Millar		
SD-C367-109 Louise Doyle		
SD-C367-129 Huzzel Mcneive		
SD-C367-138 Paul Gogarty TD	Residential Character Changes: A number of responses stated that the proposed permeable route represents a material alteration to the Monastery	

	Heath estate, which would alter the nature of the development 'inconsistent with its original planning intent'. A number of submissions stated that the absence of a pedestrian link helps preserve its residential character and sense of security. A submission stated the original estates design was to promote privacy and reduce traffic, defined by landscaping and green buffers to separate public and private spaces. The introduction of a permeable route through this space undermines the original planning rationale. Closing of Permeability Routes in the Past: A number of submissions have stated that openings have been closed throughout the LPF area because of anti-social behaviour and criminality in the past. Insufficient Community Engagement: A submission stated that insufficient community engagement had been provided with the effected community, with no direct communication received on the proposed intervention. One submission stated that the limited period for public consultation is inappropriate for a proposal of this scale and sensitivity, not meeting the standards of the Aarhus Convention and National Planning Policy. This submission also stated that inadequate detail was provided with no Environmental Impact Assessment, Traffic Impact Assessment or Safety Audit provided. One submission states that the estate was originally designed and approved as a private development, altering this without full consultation and legal consideration may not be in line with planning agreements in place.	speed limits, improved permeability, improvements to cycling infrastructure and an improved environment in the village for pedestrians and other users through village enhancement schemes. Regarding alternative routes provided within submissions, each are noted but it is considered that the proposed removal of the identified barrier to movement in this area is optimal in terms of providing better access between Woodford and Monastery Road and on to the schools on New Road as part of a wider permeability network. The LPF has undergone a Strategic Environmental Assessment and an Appropriate Assessment and a Strategic Flood Risk Assessment which are the appropriate assessments at the plan-making stage. Should further environmental assessments be required at project stage they will be undertaken at that time. The LPF was also informed by the Local Transport Plan as required by the NTA. Safety Audits are relevant to the project stage, not a policy document such as this. Changes can occur in different areas over time. At this time there is increasing recognition of the on-going changes to our way of life being faced through the impacts of climate change, the increase in traffic through a growing population and increased car ownership and our increasingly sedentary lifestyle creating additional pressures for our health system. Having regard to these pressures, there is a need for wider planning measures and transport planning in particular to respond as best it can. This includes facilitating to the extent possible measures to provide people with alternatives to the car, delivering better connections within
--	--	---

	Lighting: A number of submissions have stated that the estate has issues with street lighting at present, highlighting large trees have contributed to unsocial behaviour. Contravenes Existing Policy: One submission stated the proposed permeable link contravenes Policy H11 (Residential Privacy and Security), of the Development Plan which has a strong emphasis on the protection of residential privacy, the provision of defensible space, and the maintenance of clear boundaries between public and private domains. The proposed permeable route would conflict with H11 Objective 1, 2, 3 and 4. The inclusion of this permeable route would undermine the resident's expectation of privacy that currently exists. The submission also refers to Policy H8 (Integrity and Functionality of Open space) which they believe would be contravened, with the proposed route altering the essential function of these spaces, reducing passive surveillance and facilitating external usage without vision over the area, contradicting H8 Objective 1 and 2. The submission also refers to Policy H7 (Conditional Nature of Permeability), which they state only supports permeability where it conforms with the National Transport Authority's Best Practice Guide (2015) and includes appropriate safeguards. The submission states that the proposal fails to present evidence to show compliance with best practice relating to visibility, lighting, landscaping and	and between local places and communities, public transport and schools. Private contracts outside the planning processes are outside the remit of the LPF. Costs to the Council, and alternative uses for spending, would have to be considered as part of budgetary procedures in the normal way. The Local Transport Plan vision is: <i>To increase the number of people walking, cycling and using public transport and reduce the need for car journeys, resulting in a more active and healthy community, a more attractive public realm, safer streets, less congestion, reduced carbon emissions, better air quality, quieter neighbourhoods and a positive climate impact</i> To deliver on the vision the LTP has set out a package of measures described in the preferred plan of that report. These measures have been integrated into Chapter 5 and elsewhere within the LPF in the way most appropriate to align with the objectives of the LPF to the benefit of the whole community. In relation to conflict with existing policies, the measures for potential permeability linkages align with national, regional and local policy including the County Development Plan. As indicated above, the CDP promotes permeability that provides improved connections between housing estates and their surrounds. Policy H11 in the CDP and related objectives focus on ensuring there is a clear definition between public, semi-private and private spaces with
--	--	---

	surveillance, with no anti-social behaviour mitigation strategy submitted. Another submission made reference to CDP objective SM2 Objective 4 highlighting inconsistency with this objective, stating while the objective seeks to improve pedestrian and cycling connectivity, it also requires due consideration of existing patterns of anti-social behaviour and consultation with residents. This submission also makes reference to Section 8.7.5 of the Development Plan, highlighting the importance of careful design in boundary treatment, public lighting and planting to create a sense of security, with this proposal failing such principles, removing pedestrians from areas of passive surveillance and directing to area of limited oversight (particularly regarding entering Round Towers GAA club facilities). Other Improvements: One submission has stated that budget and resources for the proposed works should go towards pruning trees / hedgerows or dealing with footpaths which require repairs throughout the estate. Another submission stated that money should be spent on increasing waste bins, upgrading and levelling footpaths, tackling dog foul, community events and supporting tidy towns. Individual responses also highlighted the following points: Timeline for Implementation: One submission highlighted that though South Dublin County Council has no plan at this time to proceed with the works of creating a permeable route through Monastery Heath, it presents a level of planning uncertainty and risk that	security aided by maximising passive and active surveillance of streets. The permeability route would be within the public space with passive surveillance provided by the surrounding dwellings. Policy H8 of the CDP deals with Public Open Space and the need for residential development to be served by a clear hierarchy and network of high quality public open space. The opening of a barrier to permeability at Monastery Heath will not impact on the hierarchy or network of public open space. SM2 Objective 4 of the County Development Plan (CDP) also looks for additional consultation, mentioning while permeability for increased access to local shops, schools, public transport and other amenities is important, it should <i>'also take account of existing patterns of anti-social behaviour in the removal of such barriers with due consideration of consultation with local residents where need is evident or expressed'</i>. This consultation requirement is reflected in the objectives in the LPF. SM2 Objective 7 of the CDP also makes reference to promoting walking and cycling trips to schools, ensuring there are multiple access points to school sites and <i>'prioritising routes for permeability projects and provide enhancement of pedestrian and cycle ways'</i>. Having regard to the above, it is considered that the removal of the Priority Permeability Link from the Draft Plan would undermine the provisions of Chapter 5 Sustainable Movement and be at odds with National, Regional and Local policies and objectives and the actions of the SDCC Climate Action Plan. SDCC will provide additional public consultation with affected communities, completing a detailed assessment of individual permeability measures,
--	---	--

	is inappropriate and unjustified without the support of the local residents. LTP Vision: One submission stated that Section 5.4 references the Local Transport Plan vision, as the proposed introduction of a walkway from Monastery Heath Square to Woodford will not create '<i>safer streets and quieter neighbourhoods</i>'. Commercial Intent: One submission believes that the introduction of a permeable route is a commercial suggestion, with 'greed taking precedent over neighbourhoods that preserve the village feel'. Climate Action: One submission was provided which supported the permeability improvements, stating that as we face a climate crisis it is essential to support sustainable movement, with permeability improvements providing benefits for those with disabilities and mobility issues. This submission also stated that there would be no increase in anti-social behaviour by introducing permeability links but rather have an opposite effect with higher footfall creating a more active space.	completing potential detailed designs, site and environmental reports prior to implementation. CE Recommendation: No change to the Draft LPF.
--	---	--

Secondary Permeability Link - Cherrywood Avenue/Old Nangor Road		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-121 Cllr Linda de Courcy SD-C367-179 Margueritte Sherry	Cherrywood Avenue A number of submissions have been received which relate to the proposed secondary permeability route at Cherrywood Avenue. The submissions object to the route on the following grounds:	CE Response: The contents of the submissions are noted. The proposed routes are described in the LPF as a '<i>Secondary Permeability Link</i>' between Cherrywood Avenue and the Old Nangor Road, which would provide direct access to Old Nangor

SD-C367-64 Lorna Carroll SD-C367-85 Susan Fahey SD-C367-100 Jessica Keogh SD-C367-175 Grainne Mc Gowan SD-C367-147 Colin Campbell SD-C367-135 Denise Shannon SD-C367-138 Paul Gogarty TD SD-C367-168 James Wynne	1. Increased Traffic, Congestion, Noise & Accident Risk Proposal would likely encourage school parents to park in Cherrywood Avenue to walk their children through the openings to school. This pattern is already evident at Richmond Way, directly across from Gaelscoil Chluain Dolcáin and Coláiste Chillian, who experience this every school day. This situation is likely to worsen with the new school opening. The proposal would introduce extra unwanted traffic into the estate, disrupting its residential character. Furthermore, the increase in vehicle activity including engine noise, car doors and general vehicle activity would create congestion, block resident access and parking thereby negatively impacting the peace, safety and overall character of the estate. Moreover, the estate's road infrastructure is too narrow to accommodate the extra traffic, leading to accelerated wear and increased maintenance costs. Cul-de-sacs are inherently designed for low-traffic residential use, which ensures the safety of children and pedestrians. Introducing extra traffic would dramatically increase the risk of collisions, particularly at peak school drop-off times. The submission states that this combined with potentially hurried drivers, creates a situation where the potential for serious accidents is likely.	Road through a currently locked gate at one location and a wall at another along the Fonthill Road, supporting a wider network of improvements to walking and cycling infrastructure. These links would feed into a wider permeability network set out in Figure 5.9 which the LPF has identified, including the existing and proposed new connections through Clondalkin Park, and would facilitate walking and cycling in lower trafficked areas, therefore improving safety and providing options to the car. The creation of the links would facilitate direct access to Old Nangor Road for residents, facilitating access to the BusConnects network which will introduce new bus services along Old Nangor Road (routes 58 and X55), in addition to providing options for school going children and others who choose to walk and cycle to school or elsewhere, with three schools immediately opposite on Old Nangor Road. While it is recognised that there are other links such as the lane alongside Coláiste Chillian, they do not serve those coming from the south. 
--	--	--

	The submission notes that it is deeply concerning that this proposal prioritises school convenience over the rights and wellbeing of residents. E-scooters will be an issue. One submission notes there is adequate access to Old Nangor Road by Fonthill Road, Clondalkin Community Centre, Tower Road and the laneway bordering Coláiste Chillian from New Nangor Road. 2. Increased Crime and Anti-Social Behaviour Through-access is well documented to increase opportunities for crime and anti-social behaviour. At present, the limited access makes Cherrywood Avenue naturally secure. Opening gaps in the wall would create 'rat runs' and opportunities for crime, make properties and vehicles more vulnerable, reducing community safety. 3. Environmental Concerns Increased vehicle flow would raise local noise and air pollution levels, negatively impacting residents' health, particularly children and the elderly. Littering will also become an issue. 4. Impact on Property Values Homes on cul-de-sacs generally hold higher value due to their quiet and private nature. The opening of our estate would cause property	<i>Image extracted from Figure 5.9 of the LPF, highlighting the potential secondary permeability route and barriers between Cherrywood Avenue and the Old Nangor Road.</i> It is recognised that the potential for anti-social behaviour, including safety and security, is a concern to the community. The NTA Guide provides examples and detail around best practice in the implementation of opening barriers to movement. The need to reduce the potential for anti-social behaviour would be included in design considerations. It is an objective within the LPF to: SM4 Objective 2: <i>To ensure that proposed permeability links are designed in line with the NTA's best practice guidance and in such a way as to reduce the potential for anti-social behaviour, providing wide and inviting openings which are well lit.</i> In addition, a number of objectives in the LTP also make clear that local consultation with communities within which the permeability measures are proposed will be undertaken <u>before</u> implementing any proposed measures. <u>SM4 Objective 1</u> looks to '<i>support the permeability routes and links identified in Figure 5.9 and Table 5.4, subject to further consultation, which will enable quicker and safer access to schools, shops, places of work and social interaction in a pedestrian and cycle friendly environment</i>' There are also multiple objectives relating to the different categories of permeability routes in the LPF to ensure consultation prior to delivery:
--	---	--

	desirability and house prices to inevitably fall, unfairly penalising existing residents who invested here on the understanding it was a closed road.	<i>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.</i> <i>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.</i> <i>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.</i> The purpose of the links to facilitate the routes is to encourage and facilitate safe walking and cycling, it is not its purpose to facilitate cars or school drop-offs. Potential issues around unauthorised parking, noise and emissions from cars will be considered, and further consultation undertaken, prior to any opening of the barriers and measures undertaken where they are identified as being required. As highlighted during the third round of pre-draft consultation to the LPF, clarifications were provided stating that in trying to reduce congestion, no bus-gates, no additional one-way streets and no new pedestrianised streets would be included in the LPF. Instead, alternative mechanisms to help reduce congestion were brought forward, as a low intervention option, focusing on improving options for getting around without having to use the car. This included providing safe routes to schools, a reduction in speed limits, improved permeability, improvements to cycling infrastructure and an improved environment in the
--	--	--

		village for pedestrians and other users through village enhancement schemes. The effect that the opening of barriers could make to property prices has been raised in submissions. While this can be considered as part of further public consultation, there is no evidence that this would be the case in this instance and providing easier access to surrounding areas may be viewed by some as an advantage. As part of the need to reduce congestion in the village and to deliver on climate action at a local level in a time of climate crisis, it is important to facilitate as many options for walking and cycling as possible, noting also that increased permeability also supports access to public transport. Having regard to the above, it is considered that the removal of the Secondary Permeability Link and identified barriers from the Draft Plan would undermine the provisions of Chapter 5 Sustainable Movement and be at odds with National, Regional and Local policies and objectives. SDCC will provide additional public consultation with affected communities, completing a detailed assessment of individual permeability measures, completing potential detailed designs, site and environmental reports, as required, prior to implementation. CE Recommendation: No change to the Draft LPF.
--	--	---

Secondary Permeability Links - Industrial Estate / Riversdale / Mayfield		
Submission No.	Submission Summary	CE response and recommendation

SD-C367-193 Avril
McLoughlin

Concern is expressed about the opening up of Riversdale to Mayfield and the industrial estate. Concerns include noise pollution from industrial EST, anti-social behaviour, rat run for drugs which will emerge from the Mill SC site and planned development of packaging company land. Concern also about illegal dumping which the submission says they already see every week on Watery Lane. The dumping will be increased by the increased number of people coming into Riversdale and includes trolley dumping and equipment for pallet movement which increases during October for bonfire night.

The submission states that safety for children who use green space for play is wanted, the resident community put in flower beds for more biodiversity and trees please planted in the area that the LPF proposes to open. It is indicated that an opening between Riversday, Mayfield, Watery Lane and to the Industrial Estate which is noisy and dangerous for pedestrians is not wanted.

The contents of the submission are noted. The subject of the submission relates to the longer-term creation of a '*Secondary Permeability Link*' and removal of a number of barriers to facilitate it identified in the Local Planning Framework between the Ninth Lock Road at Oakfield Industrial Estate. The route would follow the existing road infrastructure within the industrial estate and then largely fall within public open space and land zoned but not yet developed as open space, as far as Woodford Road



Extract from Figure 5.9 of the LPF outlining the proposed permeability link from the Ninth Lock Road as far as Woodford Road.

The potential for this route is recognised as a long-term aspiration. It would provide for improved east-west connections within the LPF. Should mixed use or residential development come forward within the current industrial estate, which is provided for within the current town centre zoning, the identification of this route will ensure that opportunities to incorporate it into proposed development are not

		lost. The link would also facilitate greater integration with development on the Ninth Lock Framework site, noting that it is an objective to have community facilities within the site along the Ninth Lock Road. The route would also facilitate access to the new BusConnects upgrades along New Nangor Road for those within Riversdale and Mayfield. The '<i>Permeability Best Practice Guide</i>' (NTA, 2012) is included as an objective in the LPF, and is therefore aligning with H7 Objective 3 in the County Development Plan which states: <i>H7 Objective 3: To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling, having regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.</i> It is recognised that the potential for anti-social behaviour, including safety and security, is a significant concern to the community. The NTA Guide provides examples and detail around best practice in the implementation of opening barriers to movement, the need for universal access and reducing the potential for anti-social behaviour would be included in design considerations. It is an objective within the LPF to:
--	--	---

		SM4 Objective 2: <i>To ensure that proposed permeability links are designed in line with the NTA's best practice guidance and in such a way as to reduce the potential for anti-social behaviour, providing wide and inviting openings which are well lit.</i> In addition, a number of objectives in the LTP also make clear that local consultation with communities within which the permeability measures are proposed will be undertaken <u>before</u> implementing any proposed measures. <u>SM4 Objective 1</u> looks to '<i>support the permeability routes and links identified in Figure 5.9 and Table 5.4, <u>subject to further consultation</u>, which will enable quicker and safer access to schools, shops, places of work and social interaction in a pedestrian and cycle friendly environment</i>' There are also multiple objectives relating to the different categories of permeability routes in the LPF to ensure consultation prior to delivery: <i>SM5 Objective 1: To deliver the identified priority permeability routes, subject to local consultation, to facilitate improved connections to schools, increasing the safety of children currently using active travel and providing improved options for</i>
--	--	---

		<i>children and their parents / guardians currently travelling by car to switch to walking or cycling.</i> <i>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.</i> <i>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.</i> Having regard to the above, it is considered that the removal of the Secondary Permeability Links from the Draft Plan and associated identified barriers would undermine the provisions of Chapter 5 Sustainable Movement and be at odds with National, Regional and Local policies and objectives. It would also be contrary to the objectives of the SDCC Climate Action Plan. SDCC will provide additional public consultation with affected communities, completing a detailed assessment of individual permeability measures, completing potential detailed designs, site and environmental reports, as required, prior to implementation. CE Recommendation No change to the draft LPF.
--	--	---

Village Centre (East-West and North-South) - Strategic Permeability Links		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-28 Wayne McGuire	Village Centre (East-West) - Strategic Permeability routes The routes being referred to are identified in many submissions as Per11 and 12 as referenced in the Local Transport Plan.	The contents of these submissions are noted. The subject of the submissions relates to the creation of a '<i>Strategic Permeability Link</i>' moving east - west and north south through the Village Centre. A number of submissions have referred to Per 11 and 12, a reference used in the Local Transport Plan (LTP). The LPF has been informed by the LTP and has included these routes through the village centre, categorising them as strategic permeability routes. Strategic Permeability Routes are described in the LPF, page 47, as: <i>These routes are required to be delivered in the longer term and will be critically important to ensuring that new development and key lands provide for active travel to the village centre, services and schools to the greatest extent possible, and facilitate maximum access to public transport.</i> The routes are identified in Figure 5.9 and described in Table 5.6 in Chapter 5 of the LPF.
SD-C367-187 Margaret Caddle		
SD-C367-26 Carol Moxham Wynne	Submissions argue that these proposals don't provide any shorter route from what's already there. Notes also that children at St. John's primary school have found syringes from drug users in the yard. States also that these routes provide hiding areas which support anti-social behaviour and question if the local gardai have been consulted in relation to provision of these routes.	
SD-C367-108 Orchard Road Residents Association		
SD-C367-168 James Wynne	One submission notes that this proposal will present safeguarding issues as it provides for a connection through St. John's School.	
	A number of submissions have expressed concern with the permeability routes in the centre of the village, through what they indicate looks like St. John's Church. <i>Heritage & Graveyard Conflict</i> St. John's Church Graveyard: The proposed route appears to traverse or directly adjoin the historic St. John's Church graveyard, one of the most significant ecclesiastical sites in Clondalkin. This is not merely "open space": it is consecrated ground, a place of memory, and a recorded archaeological	

	site. This site falls under the legal protection for the National Monuments Acts and requires - Any works here would fall under the National Monuments Acts and require Ministerial consent, archaeological assessment, and likely opposition from the National Monuments Service. The proposal is legally fraught. <i>Plan contradiction:</i> The LPF's own Conservation & Built Heritage chapter stresses the need to protect ACAs, Protected Structures, and graveyards. To propose PER 11 in this location is to undermine the credibility of the entire document. - Ecological & Biodiversity Impacts Bat populations: The area is known to support bats roosting in mature trees and heritage structures. All bat species are protected under the EU Habitats Directive (Annex IV) and the Wildlife Acts. - Lighting threat: The Draft LPF suggests 24-hour lighting for "security." This would devastate bat commuting corridors (bats avoid lit areas, lose feeding routes, and fragment into smaller, less viable groups). - Birdlife: Nesting birds — from common robins to potentially owls or kestrels — are sensitive to artificial illumination. Extended "false day" cycles disrupt feeding, reduce chick survival, and increase predation by cats and corvids.	 <i>Image extracted from Figure 5.9, highlighting the potential strategic permeability routes through the 'oval' of the village centre and their relationship to other strategic routes.</i> Table 5.6 of the LPF describes the Strategic Permeability Links identified within Figure 5.9 as follows: <i>The Village Centre has opportunity to provide permeable routes through back land development which will enable the establishment of new connections, enhancing journey time towards schools, leisure facilities and reducing the need to use private transport to access the village. The aim of enhancing permeability links within the village centre is to increase journeys towards the village as a destination. These connections will require the opening of backland development within the village core and establish additional connections which will link</i>
--	--	--

	- Policy contradiction: The LPF's Green Infrastructure objectives (GI1–GI6) call for enhancing biodiversity and reducing fragmentation. PER 11, with its floodlit corridor through a semi-natural historic area, does the exact opposite. <i>Planning Feasibility & Maintenance</i> - Practical impossibility: To make this corridor “safe” under modern standards would require widening, tree clearance, heavy surfacing, continuous lighting, and fencing. The result would be expensive, ecologically damaging, and visually intrusive – yet still inferior to public-land alternatives. - Maintenance burden: Who pays to repair fences, remove graffiti, fix lighting, and clear rubbish? Inevitably, it will fall on both SDCC (cost to the taxpayer) and on residents (cost to their wellbeing). <i>Policy Contradictions</i> - County Development Plan: The South Dublin CDP emphasises protecting residential amenity, safeguarding heritage, and promoting Green Infrastructure. PER 11 undermines all three. - LPF internal conflict: Chapter 5 (Sustainable Movement) must be read in harmony with Chapter 4 (Green Infrastructure) and Chapter 7 (Conservation & Built Heritage). PER 11 tears those chapters apart. <i>Alternatives Exist</i>	with priority and secondary permeability corridors (e.g. Q's Snooker Hall towards Moyle Park Open Space). East-West Strategic Permeability Routes The east-west routes identified by the arrows relate to the potential to create pedestrian and cycle links within the village centre, the key link would run between the Tower retail centre and St. John's National School on the one side and through the current car park at the back of the Steering Wheel, out by the side of Quinlan's (The Black Lion). The intent of including this within the LPF is to ensure that should redevelopment come forward in the future the opportunity is not lost to provide greater connectivity within and through the village centre and potential backland development.  Google maps image of the area where the Strategic Permeability Route (identified as Per12 in many submissions) would be indicatively located.
--	---	--

	The LPF already proposes strategic, public-land spines (Village Centre, Ninth Lock, Knockmeenagh) and enhancements to existing green corridors (Camac, Grand Canal). These deliver permeability at scale without invading gardens or desecrating heritage. Village Centre (North-South) Strategic Permeability Routes This route has been referenced in many submissions as Per11, the reference given to it in the LTP. A number of submissions refer specifically to the route from Orchard Road southward towards Main Street: - This route is unnecessary as there are paved streets/footpaths within meters - The laneway will be dangerous and secluded (it will also need to be walled off making it more dangerous). A haven for anti-social behaviour. - Will become littered with drugs paraphernalia and other rubbish, which will very likely also be thrown over the walls into gardens and the Church of Ireland churchyard. - It will negatively affect the safety of the homes which will back on to it, by allowing a very easy access route for burglars to enter properties. Submission notes that this is happening without access being provided by a laneway. - It will be a dark alleyway or if lighted it will people's private gardens with yet more light	As shown in the extract above, a further east-west route is shown on the LPF running through the north side of St. John's Church from its existing entrance to the eastern boundary. It is understood that this is a very sensitive area. No works could be carried out without the consent of the church patrons, or the relevant monuments consents and environmental assessments. The route is indicative to show how a network of routes within the village would help towards a more pedestrian friendly environment should opportunities arise to deliver them. It may be that other opportunities in the immediate area could come forward which would serve the network equally well. The delivery of these routes is aspirational at this time and could only come forward as part of future development and prior consultation with landowners. However, their inclusion within the LPF means that they can be designed in to future development should the opportunity arise. Issues regarding safeguarding are of utmost importance to the council, and this route will not pass through the schoolyard. North-South Strategic Permeability Routes The concerns at the inclusion of this route, identified in many submissions as Per11, is acknowledged. This route is shown behind the houses on Orchard Road along an existing laneway and then connecting into an east-west route which runs from Tower Road to Orchard Road by way of the existing car park at the back of the Black Lion.
--	---	---

	pollution in the hours of darkness. Both are negatives. - It will involve removing a beautiful and very old natural stone wall; mature trees, hedges, flowerbeds, seating areas and other garden amenities, which aside from supporting biodiversity at the moment with birds, pollinators and other wildlife residents; are part of <i>privately owned homes</i>, which are themselves located within an SMR Zone of Notification. - It is likely that items of architectural interest will be damaged. - The proposal is adding additional stress to residents anticipating further disturbance and loss of privacy adding to the stress already caused by the existing nightclub at Quinlans pub which blasts out loud music at night. A submission received from the Orchard Road Residents Association opposes the proposed north south route from Orchard Road towards Main Street by reason of it being an impractical, unsuitable approach and would have unintended negative consequences for the local community and the residents of Orchard Road: as outlined below; - The proposed access route PER11 appears to travel directly through the gardens of homeowners on Orchard Road, utilising land that is owned and within the red line boundary of the plot owned entirely by several homeowners. We strongly object to	 It is recognised that the laneway is not in public ownership and cannot be delivered without the consent of the relevant landowners. The delivery of these routes is aspirational, and they could only come forward as part of future development, and subject to the necessary environmental and other assessments and prior consultation with landowners. However, their inclusion within the LPF means that they can be considered as part of future development should the opportunity ever arise. It is considered that the removal of these Strategic Permeability Links from the Draft Plan would undermine the potential for their delivery should an opportunity ever arise. It would also undermine the wider provisions of Chapter 5 Sustainable
--	--	--

	the assumed usage of land owned by residents for any access lane through Orchard Road. - There is no detail or description on how the lane that is currently used as the sole access point to garages belonging to homeowners on Orchard Road could also be used as a pedestrian walkway/cycleway. How can a lane that is utilised daily by residents with cars for garage access also act as a safe pedestrian walkway/cycleway? - The proposed walkway/utilises an isolated lane directly behind the homes of Orchard Road residents which could attract antisocial behaviour as is regularly witnessed in isolated lanes and areas in the community. - The isolated and unmonitored lane would provide greater ease of access for potential burglaries of homes and garages, significantly increasing the security risk for Orchard Road Residents. - One submission notes that the proposal for a north south permeability route through the Oval traverses over some of the most historic graves within St John's graveyard which is a protected structure and of historic significance. Another submission requests the removal of this permeability route (referred to as Per 11) from the LPF on the following grounds. - Residential Amenity, safety and security Impact on Multiple Households	Movement where they are included as part of a package of measures to improve movement within the village and its environs. While not all deliverable in the short-medium term, and some such as these routes may never be achievable if the opportunity does not arise, they should nonetheless be included in the LPF to support their delivery where the potential arises. Their inclusion aligns with National, Regional and Local policies and objectives and climate actions. It is considered, for the reasons outlined above, that the routes should be retained in the LPF. However, to make clear that these routes are aspirational and subject to future opportunities arising through planning applications and / or landowner consent, as relevant, a new objective should be inserted into chapter 5 as SM5 Objective 3 and the remaining objectives renumbered accordingly. CE Recommendation: To retain the Strategic Permeability Routes as shown on Figure 5.9 of the LPF and to add a new objective SM5 Objective 3: New SM5 Objective 3 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. And the remaining objectives to be renumbered accordingly.
--	--	--

	- Impact on multiple Private properties: The proposal goes through the private gardens of multiple households fronting Orchard Road. There is no public right of way, no existing laneway, and no landowner consent. The landowner consent requirement will not be met here. - The proposal will bring anti-social behaviour and affect the security and safety of multiple properties. - A narrow, back-of-plot corridor cannot meet modern urban design standards for safety: it will be poorly overlooked, prone to vandalism, and difficult to police. - Residents of other estates in Clondalkin already report persistent issues with linear cut-throughs (graffiti, loitering, intimidation). Installing another “rat run” here is knowingly importing those problems into Orchard Road.	
--	--	--

Safe Routes to School		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-4 Bea CarBan SD-C367-1 Cllr Trevor Gilligan PC SD-C367-172 JOS Services	Safe Routes to School A number of submissions strongly advocate for safer school routes and accessible community spaces. Driving is not an option for everyone and rather than prioritising road space for the convenience of private vehicles priority should be given to community well-being. One submission states that they look great,	CE Response: The contents of the submissions are noted. The council notes the support for Safe Routes to Schools, highlighting the need to support schools in increase those walking and cycling to these locations. The support of the Department of Education and Youth to the Safe Route to Schools and related objectives is welcomed.

SD-C367-177 Marie Cranny	colourful and are highly visible to motorists which will improve safety.	Though there is support for Safe Routes to Schools, there are others opposed to them with a number of people believing they will narrow roads, remove road space and cause undue safety concerns for pedestrians and cyclists. It is noted that the Bawnogue area is outside the area and scope of the LPF.
SD-C367-178 Terence McMenamy	The Department of Education and Youth notes and supports the following Sustainable Movement Objectives;	
SD-C367-124 Deborah Arnold	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.	Safe Routes to Schools are there to support measures that prioritise safety of school children and the creation of safer routes through the implementation of appropriate infrastructure measures. This nationally funded mechanism of improving school safety has provided success nationally and will create safer spaces outside schools, which requires buy in from the local community and those who attend the schools.
SD-C367-148 Jennifer Tracey	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.	
SD-C367-142 Jamie Nolan	SM? Objective 4: To investigate the delivery of a school bus service within Clondalkin, liaising with the Department of Education, local schools and bus operators, to provide a service that enables a reduction in private vehicle usage and a reduction in traffic and parking outside schools.	The future Safe Routes to Schools Zones will require additional public consultation, which will generate ideas and concepts including walking buses, additional road crossings, reduced speed limit and other measures which will improve child safety.
SD-C367-146 Victor Madden		
SD-C367-157 Ms F O'Connell	Another submission notes that schools lack safety measures to allow children to cross roads safely. Children have previously been hit by cars and some residents and politicians are concerned about the narrowing of roads for cars rather than safety.	The LPF includes Safe Routes to School Zones as part of a package of measures to improve safety in and around schools and elsewhere within the village. Other measures include traffic calming, pedestrian crossings, traffic signal improvements, improved permeability and reduced traffic speeds.
SD-C367-163 Department of Education & Skills	A number of submissions oppose the safe route to schools proposals on the grounds that they will lead to narrow roads, removal of road space, and undue safety concerns for pedestrians and cyclists.	It is considered that the inclusion of Safe Routes to Schools will support the delivery of a reduction in congestion at schools, an increase in student safety and provide additional road infrastructure which will benefit the wider Clondalkin community.

	A number of submissions argue that the 'Safe Route to School' measures on the Old Nangor Road have not been a success stating that there have been a number of near accidents due to the measures. The submission makes the point that it is unsafe for pedestrians and cyclists, as paths have been widened, roads narrowed. One submission notes that schools lack markings and safety measures to allow children to cross roads safely. Children have previously been hit by cars and some residents and politicians are concerned about the narrowing of roads for cars rather than safety. Calls for immediate safety measures across all Clondalkin schools including the installation of traffic lights, enforcement of double yellow lines and active Garda monitoring. The incident at Bawnogue School where a child was hit by a car underscores this urgency. The Bawnogue and Deansrath areas lack accessible play areas, safe cycling routes and sport pitches. Another submission states that they find it hard to recall accidents involving kids going to or from school. It is compliance and policing that are the major issues and this should be addressed rather than restricting traffic under the safe routes to school proposal. One submission requests that consideration be given to placing bollards on New Road footpaths from the end of 'Safe Routes to School Zone' to the junctions of St Brigid's Road and Knockmeenagh Road to enhance pedestrian and cyclist safety.	CE Recommendation: No change to Draft LPF.
--	--	--

	One submission proposes to make 'safe' designated drop off points around the village. For example, the shops on Monastery Road can act as a meeting point for parents and can walk to school (same idea as a 'walking bus'). This will stop large volumes of cars trying to park at the schoolground. It will also encourage car pooling to the drop off points, reduce tardiness due to traffic and people abandoning their cars due to frustration. Another submission states that school parents attitudes will not change and they will continue to put on their hazards and let the kids out into the traffic, or park on double yellow lines to do the same.	
--	--	--

Public Transport		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-54 Cllr Francis Timmons	Public Transport - Bus One submission states that the bus network Table (5.2) should include the planned Bus Connects routes. Another submission asks why the Framework does not mention any of the current Bus Connects plans, particularly the removal of the left turning slip road from Woodford Walk onto the New Nangor Road. The submission notes that the Bus Connect plans will already cause serious congestion through Woodford & Watery Lane and questions if SDCC has looked at any of the Bus Connects plans while compiling this Framework?	CE Response: The contents of these submissions are noted.
SD-C367-197 Rhona Kerins		SDCC has engaged and will continue to engage with the NTA on the BusConnects plans. The National Transport Authority (NTA) were directly involved in the delivery of the Local Transport Plan (LTP) and have engaged with the Council as part of the delivery of the Draft LTP. Chapter 5 highlights all proposals for additional public transport routes in SM7 Bus and SM8 Rail.
SD-C367-187 Margaret Caddle		
SD-C367-171 Claire McCarthy		
SD-C367-145 Red Network		The proposed BusConnects routes are highlighted on Figure 5.5 of the LPF which identifies the existing bus routes in blue and the proposed BusConnects routes in red alongside the bus stops for each.

SD-C367-138 Paul Gogarty TD SD-C367-143 Brian Ronan	A submission states there is a lack of evidence of engagement with the NTA on how public transport will be improved in the village area or new access routes sought. Asks whether any commitments have been made in this regard pending the plan's adoption? One submission welcomes the proposals for additional public transport as they live in a part of Clondalkin with only one bus route but goes on to say that this proposal is compromised by the proposed narrowing of streets and removal of left filter lanes. One submission note that local buses are an embarrassment to the country they don't run on time can't rely on them turning up either and with is effort of a plan put in there's still a fair walk involved for the elderly never mind getting caught in the rain or bad weather. A submission states the LPF makes a reference to adding an additional 1,500 EV buses to the current fleet to assist public transport, however, public transport providers do not have enough drivers at present. One submission welcomes the proposals for improved public transport and is needed for the plan to work.	The additional 1,500 EV's is outlined within the Local Transport Plan (LTP) and comes from the Climate Action Plan (CAP) 2024 as a KPI. The Climate Action Plan has statutory footing through the Climate Action Act, with the continued electrification of the network ongoing. Issues in relation to the operation of individual bus services are a matter for the relevant operator. However, it is understood that the operators are aware of the issues where they relate to buses not turning up and are actively trying to resolve them. The LPF has identified a number of potential permeability routes which would help with access to public transport. Any changes to junctions will be assessed as part of a wider strategic assessment within Clondalkin and will take account of the need for buses and other vehicles to navigate them. CE Recommendation: No change to the draft LPF
SD-C367-155 Iarnród Éireann / Irish Rail SD-C367-143 Brian Ronan	Public Transport - Rail Iarnród Éireann (IÉ) wished to highlight that residents, businesses and visitors to Clondalkin will benefit significantly from the Dart+ Southwest project, with the Clondalkin – Fonthill, Park West, Cherry Orchard and newly opened Kishogue station being located close by.	CE Response: The content of this submission is noted. The Council welcomes the granting of the Railway Order for the Dart+ Southwest and the increased capacity that this will bring for those living, working and visiting Clondalkin and the surrounding area.

SD-C367-3 Martin Kavanagh	IE welcomes the measures to improve cycling and walking access to rail stations and encourage the use of public transport links to support the significant investment in rail services for the area. IE supports and would encourage further improved connection and wayfinding to all rail stations as proposed in SM3 Objective 3 and supports SM8 Objective 1, 2 and 3. IE notes that the LPF boundary does not bound the rail line however they wish to highlight the recommendation in the All-Island Strategic Rail Review to protect railway corridors for future rail expansion in future land use plans and forward planning objectives. A submission highlights reasons why Fonthill train station is underutilised including; - Trains at capacity before they reach Fonthill station - Lack of suitable services in both destination and frequency - Lack of awareness of the services - The access to the station via public transport Another submission states that a large share of people need to get a lift in a car to either Fonthill railway station or the Red Cow Luas and nothing has been done to address this. The LPF only mentions looking at rail after 2042.	This will provide a greatly enhanced service and more sustainable transport options for communities by providing higher frequencies and increasing passenger capacity from the current 5,000 to 20,000 per hour in one direction. Proposed upgrade works are due to commence in 2026. The welcoming of the objectives by Irish Rail contained within the LPF to support connectivity to the rail services through the identified routes is noted. In relation to improving connectivity to the rail stations, South Dublin County Council will continue to liaise with the NTA to support and improve bus services to the rail stations. The L54 bus route is a current example of public transport that services both the Red Cow Luas Stop and Fonthill Railway Station. It is considered that the improvements outlined above, alongside the growing population adjacent to the station, will overcome the current underutilisation of Fonthill train station. Chapter 5 of the LPF has indicated the improvements to the rail network including Dart+Southwest and the transport interchange at the Red Cow. The reference to post 2042 rail is in Figure 5.6 which relates to the indicative route of a post 2042 Luas identified in the current GDA Strategy. CE Recommendation: No change to the draft LPF.
----------------------------------	--	--

SD-C367-157 Ms F O'Connell SD-C367-158 Christopher Conway SD-C367-135 Denise Shannon	Public Transport - Rail A submission queries does the blue line in Figure 5.6 'Potential High-Capacity Links to existing rail network' mean opening a road between Cherrywood Avenue and the village so it is no longer a cul de sac. Another submission states that the Luas extension to Clondalkin and Lucan is critical for future growth. It makes no sense that this might not even go ahead until after 2042. Another submission relates to the Local Transport Plan (LTP) and the inclusion of PT1 which is for a <i>'Long term higher capacity public transport route along link road through Ninth Lock Framework Area, and along Clondalkin Park following previous alignment for Metro West'</i>. The submission objects to the development of the route option on the following grounds: 1. Traffic and Safety Concerns: The proposed increase in capacity will significantly raise traffic volume which will create potential congestion and increase risks for pedestrians, cyclists, and local residents, contrary to the council's duty to promote safe and sustainable transport. 2. Environmental and Noise Impacts: The service will increase noise and emissions during peak	CE Response: The content of the submissions are noted. As indicated in the submission, Figure 5.6 shows a route described as 'Potential High Capacity Links to existing rail network. This link represents the original alignment of MetroWest which was included in previous GDA Strategies. While not in the current GDA Strategy the reservation is included in the adopted County Development Plan 2022-2028 recognising that it may be needed in the future and this figure reflects that. Any concerns raised will be considered as part of any project in the future. The timeline for delivery of the Luas Lucan scheme is set down within the GDA Strategy and will be delivered by TII. The development of a preferred route commenced in 2024 and TII has indicated that it plans to finalise the emerging preferred route in the first quarter of 2026. CE Recommendation: No change to Draft LPF.
---	---	--

	periods and late evenings, adversely air quality and residential amenity. 3. Anti-Social Behaviour: The proposed scheme may encourage loitering, noise disturbances, and littering in nearby residential areas, with higher late-night services in particular raising concerns about alcohol-related disturbances, vandalism, and reduced feelings of safety. 4. Impact on Community Sports Facilities: The proposed route passes directly in front of the local GAA pitch, which is heavily used by children, young people, and community teams throughout the week, with increased traffic flow and larger vehicles at this location creating significant safety risks for players and spectators entering and leaving the grounds. It would also reduce accessibility during training sessions and matches.	
--	---	--

Traffic Management		
A number of submissions refer specifically to alterations to traffic movement within the village centre, Following on from the third round of public consultation, the Council highlighted to members of the community that there would be no alterations to the movement of traffic within the LPF boundary. Traffic will continue to move through the village as it does currently, with no bus gates provided, no additional one-way streets and no pedestrianisation of streets. In reaching the preferred strategy for the LPF, the LTP went through a process of high intervention options which were not deemed appropriate by the wider community. Therefore, the preferred plan focuses on low intervention options, part of which involves different traffic management measures to achieve the objectives of the LTP and LPF.		
Submission No.	Submission Summary	CE response and recommendation

SD-C367-3 Martin Kavanagh	Traffic Management A number of submissions oppose traffic calming measures (traffic restrictions) and junction improvement in the village as it will make traffic congestion worse.	CE Response: The content of these submissions are noted. This response deals with general issues raised on traffic management proposals. It should be noted that the NTA and OPR are supportive of traffic management measures in the LPF.
SD-C367-82 Kathy O'Sullivan		
SD-C367-32 Susan McDonagh	A number of submissions state that there is a lack of evidence of studies assessing the implications of reducing traffic in the Village Centre on the surrounding road network.	Objective QDP14 Objective 3 within the County Development Plan (CDP) seeks:
SD-C367-50 Linda Hegarty		<i>QDP14 Objective 3: To prepare a LAP for Clondalkin, the extent of the boundary to be defined, which will be guided by the Local Area Plans Guidelines for Planning Authorities, 2013 (Department of the Environment, Community and Local Government) or any superseding guidelines and which will incorporate:</i>
SD-C367-77 Mick Hallows	One submission asks what studies have been carried out to assess the implications of the Do Minimum strategy. For example, what would the removal of the left turn slip lane at the Ninth Lock Road/New Nangor Road junction mean assuming that the traffic volumes remain constant. The Ninth Lock Road is already a heavily congested route, and the plan doesn't appear to take into account implications on surrounding road networks. Consideration should also be given to how these cycle, pedestrian improvements and traffic management/calming interventions impact on the current volumes of traffic, safety and journey times. The Bawnogue road is an example of inefficient design.	- <i>A vision for the development of Clondalkin</i> - <i>Wider urban design principles</i> - <i>Framework plans for larger infill sites</i> - <i>A Conservation Plan</i> - <i>A local Green Infrastructure strategy derived from the County GI Strategy</i> - <u>Local Transport Plan</u>
SD-C367-83 Annette and Roger Molony		
SD-C367-110 tom murphy		
SD-C367-194 Catherine BERRY-BYRNE		
SD-C367-177 Marie Cranny	CSO figures used in the study are based on 2022 data, the submission asks if any other more recent studies carried out to assess the impact of increase in traffic volume and population.	The requirement to complete a Local Transport Plan (LTP), meant that the Local Planning Framework (LPF) was supported by detailed baseline of the current traffic situation, where opportunities for improvement were brought forward in the selection of the preferred strategy. The LTP was completed using the ABTA (Area Based Transport Assessment) process, which ensures that the assessment of transport demand and its associated impact play a central role in informing the relevant policy documents, in this case the Clondalkin Local Framework
SD-C367-65 David Tyrrell		
SD-C367-99 Siobhan O'Neill	Another submission disagrees that the proposed permeability routes will improve the traffic issues in	

SD-C367-101 Tony Wall	Clondalkin and suggests that a 2 way traffic system in the village might be the solution.	Plan. Essentially, its function is to place the integration of land use and transport planning centrally within the Plan preparation process.
SD-C367-102 Peter Minahan	Another submission states that the proposal to block access to cars through main street, will result in traffic from Monastery Rise having to turn onto New Road, passing Coláiste Bríde, Scoil Aine, Scoil Ide, come down through St Bridget's Estate, passing St Joseph's, Scoil Muire and Moyle Park in order to drive to Tower Road. The submission notes that this additional traffic will increase traffic and will be a massive safety issue for the children attending these schools. As it is, the traffic on these roads is already at a very dangerous level when the schools open and close. The submission suggests the following; - in order to reduce traffic outside schools, and make it a child friendly environment, the main street should be straightened out so 2 lanes of traffic can pass through and so reduce the tailbacks building up in the first place. - the traffic island at the junction of Tower Road onto Old Nangor Road should be reduced (made smaller/ brought back by about 1 foot) to allow 2 lanes of traffic and so increasing the flow of traffic. - to reduce traffic in the village there should be FREE OF CHARGE park and ride facilities provided on the outskirts of the village. - To reduce traffic in and around the village there should be a Junction 8 on and off the M50. Traffic from Parkwest and surrounding business areas use Clondalkin roads to access the M50 and N7 and so increase traffic	The early consultation phases identified a need to focus on traffic management solutions as one of the measures to help alleviate congestion and improve safety. The baseline study and surveys carried out by ARUP, as consultants employed to undertake the LTP, identified the following traffic related issues in Clondalkin
SD-C367-103 Cllr Francis Timmons		
SD-C367-104 Cllr Francis Timmons		
SD-C367-116 Lyndsey Doyle		- 70% + through traffic - Congestion around school times (am and pm) - Public Transport inefficiencies
SD-C367-182 Vicky Kealy		Having assessed a number of options which it was considered could relieve traffic congestion within the village, support modal shift with associated environmental and health benefits, improve safety, and having gone through a number of pre-draft public consultation exercises, a package of low intervention recommendations emerged from the LTP process.
SD-C367-199 Woodford Resident		
SD-C367-197 Rhona Kerins		
SD-C367-197 Rhona Kerins		These recommendations have been integrated into the Local Planning Framework in the way considered most appropriate to the overall framework. As highlighted in the introduction to this section, the full detail in the LTP recommendations has not always been included in the LPF. This is largely because the LPF recognises that there will need to be further design analysis and public consultation for the package of measures including road, traffic and junction management solutions.
SD-C367-192 Eileen Cronin		
SD-C367-183 Nicola Flynn		

SD-C367-113 Tony Browne	especially through Woodford onto Woodford Hill and the roundabout at the junction with Monastery Road. The changes made to the roundabout a few years ago worsened the problem when the 2nd lane was taken away.	The LPF has also provided a number of objectives associated with further design analysis and public consultation which are:
SD-C367-117 Teresa Farry Roberts	- To reduce traffic in and around the village:	<i>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.</i>
SD-C367-127 Philip Coby	Open a new access/exit from one side of the N7 to the other, perhaps widen Knockmenagh Lane at the Monastery Road end to give access to vehicles and out through St Bridget's Cottages onto the Naas Road?	
SD-C367-190 Miriam Anderson	- While some pedestrian crossings exist, it is recognised that these require improvement works in places, with potential for the lights to be more responsive and 'smart', allow traffic to move while pedestrians are not waiting to cross the road or where speed limits are reduced, lights are replaced with zebra / toucan crossings." The submission notes that the pedestrian lights on Woodford Hill take too long to change for Pedestrians. The same for the lights on the bridge over to the LUAS. The operation of both these sets of lights need to be changed.	<i>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.</i>
SD-C367-189 Cllr Trevor Gilligan PC		The concern that the proposed introduction of the traffic management measures has raised amongst residents in and around the village, and the stated reasons for them, is acknowledged. However, some of the issues raised by residents are not a part of the LPF. These include alterations to traffic movement within the village centre. As identified to the community during the third round of public consultation, there would be no bus gates, no additional one-way streets and no further pedestrianisation within the LPF area.
SD-C367-176 Grace Keane		
SD-C367-134 SEBASTIAN TINEGHE		
SD-C367-188 Paul McKiernan	One submission objects to traffic management proposals on the grounds that it will make a chaotic situation even worse especially as the impact of the development at Clonburris has not fully come into effect as yet.	Anti-car policy has been mentioned in a number of submissions, and while sustainable methods of transit are prioritised in line with national and regional policy, cars can still move through the village centre and will not be interrupted from doing so within the current layout. This must be balanced with the need to reduce traffic
SD-C367-187 Margaret Caddle		
SD-C367-184 Janet McKiernan		
SD-C367-173 Ann Gilsenan		

SD-C367-171 Claire McCarthy	Other submissions note that residents of Clondalkin are often blocked into their estates as it is. The difficulty entering causes damage to cars and is also dangerous for pedestrians.	congestion, to create safe pedestrian and cycle environments which can shorten routes to schools and to different areas with the wider village, the potential environmental benefits in reducing emissions and encouraging more healthy ways to move around what are generally short distances, While it is recognised that the percentage of electric cars is increasing, the issue of emissions remains.
SD-C367-125 andrew McCabe		
SD-C367-140 John Quinlan	Another submission states that changing all the roads around the one-way system, to single lanes, will increase congestion.	
SD-C367-161 Cllr Linda de Courcy	One submission states the closure of Main Street to vehicular traffic will result in increased gridlock.	A number of submissions have identified a new junction to the M50 from Junction 8 and onto the N7. National roads and motorways are the responsibility of TII. The council has no remit to create entrances onto National Roads and it is outside the scope of the LPF to do so.
SD-C367-146 Victor Madden	One submission states the narrowing of the carriageway along Main Street and Tower Road and from Orchard Road to Monastery Road is a concern.	
SD-C367-157 Ms F O'Connell	One submission states that it makes no sense to make it more difficult for motorists to do business in the village. On our many meetings with South Dublin a few months ago we agreed this proposal would not be implemented. People need access to the village by car for the many schools and businesses in the area.	Some submissions have sought that the two-way traffic system be reintroduced along Main Street. This was assessed by the LTP team and was not deemed a solution to traffic congestion. This is due to the removal of footpath space to allow for the sustained movement of cars, wider carriageway requirement to allow for passing traffic (including buses) and the growth in the size of cars since the establishment of the one-way system. For the above reasons, it is not considered appropriate to provide a two way traffic system along Main street.
SD-C367-158 Christopher Conway		
SD-C367-150 Mia Colgan	One submission states that the narrowing junctions, removing slip roads and introducing cycle lanes into already narrow roads that barely fit one car at a time will only grind an already snails pace to a standstill. It notes that a car journey through the village can vary from 4 minutes on a good day to up an hour on a busy afternoon and the proposed changes will only exasperate that further. It will create bottle necks, grind traffic to a halt and further negatively impact locals in the area. The submission gives the example that when the roundabout at the top of Monastery hill	In response to submission's highlighting traffic issues outside the boundary of the LPF (e.g. Bawnogue Road, Clonburris SDZ, N4 Lucan), though the submissions are noted, these roads are outside the boundary of the LPF and therefore fall outside the remit of this Plan. The Council will continue to provide works on additional routes throughout the county through the Transport Department.
SD-C367-160 Patrick Duffy		
SD-C367-202 Aeton Family		
SD-C367-203 Philip Whitty		

SD-C367-204 Bernadette Jewel	was modified (despite the protests) it did not deter commuters from travelling the route only increased the travel time for the locals using it.	A number of submissions stated that the proposed measures will have an impact on the elderly population, those who are disabled or have additional needs. It should be noted, as part of the Village Enhancement Schemes (VES), the need for further accessible parking will be examined, with the aim to create additional parking for those with accessibility issues, which will directly benefit those who require access to services within the village centre. There are no plans in the LPF to restrict access to the village centre.
SD-C367-205 Breda Fitzsimons	One submission states that the narrowing of road lanes by provision of cycle lanes delineated by bollards is a proven safety issue and means that emergency vehicles cannot get access. This proposal and removal of left turning lanes will increase traffic congestion in adjoining areas and reduce safety and quality of life in Clondalkin.	In response to junction changes, the Council will, as highlighted in SM9 Objective 1:
SD-C367-206 Caroline Fallon		<i>'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'.</i>
SD-C367-207 Carroll Family		Junction improvements, where deemed appropriate following further detailed examination, are an important element of a package of measures to try and improve general safety for those using the roads and footpaths, helping to reduce speed and through traffic.
SD-C367-208 Laura Goke	A number of submissions note that the narrowing of roads for cycling and people using their bicycle for shopping is unrealistic and make it inaccessible for the elderly or people with mobility/health issues. One submission notes that with regard to the village, everyone needs access to the available services, provided in the village, pharmacy, GP, shops etc. We need to support local business and with placing cycle lanes around the village, it will be very difficult to drive around the village with narrower roads, which seems to be the plan. Lots of people, including the elderly depend on their cars, noting that not everyone can walk or cycle. The submission requests that we don't make life harder for these people. The risk is that people will drive further afield and generate more emissions resulting in our local businesses losing out. Another submission states that the narrowing of roadways / ridiculously thinking of people getting their shopping and transportation of said on a bicycle shows an absence of logic. The submission states that the proposals will create total gridlock.	Following adoption of the LPF, a Village Enhancement Scheme for Clondalkin will be progressed. As part of this any junctions within the VES area will be assessed and if alterations are required, they will be included as part of the project and subject to public consultation under Part 8. The assessment will take account of all modes of transport and provide a detailed analysis of the safest options for each junction.
SD-C367-209 Cormac Dowling		
SD-C367-210 Cronin Family		
SD-C367-211 Damien Bimowski		
SD-C367-212 Donna McGlynn		
SD-C367-213 Edel Sayce		
SD-C367-214 Elaine Fannin		

SD-C367-215 Elizabeth Caddle	Another submission states that to close off existing roads and routes and expect everyone to cycle or walk, including the elderly is not acceptable. Dropping children from the same family to different schools also is never going to work with a walk/cycle mentality as it'll make children late for school! The submission requests SDCC to leave the village and surrounding roads alone and don't carry out unnecessary changes.	Implementation of any further junction changes will examine in detail issues around access and design of the proposed alteration. The purpose of what is included in the Plan is to identify where junction improvements could go. It should also be noted that not all junctions require tightening, some may require additional widening etc.
SD-C367-216 Sinead McEvoy		
SD-C367-217 J O' leary	One submission notes that the narrowing of the junctions and roads for cycle lanes is a clear attempt to prevent people accessing the village and as a business owner in the village of the last 40 years and residents find this extremely worrying and stressful. This will only add to the increase of emissions from cars stuck in traffic.	Figure 11 'existing and proposed safe routes to school locations and proposed junction improvements', has led to confusion between the broader objectives of the LPF and the detail contained within the LTP. Therefore, it is considered appropriate to alter Figure 5.11 in the LPF to remove the junction numbers, so there is no confusion between what is stated within the LTP and the LPF.
SD-C367-218 Geraldine Courtney		
SD-C367-219 Kay O'Byrne		
SD-C367-220 Lestrangle Family	Another submission opposes the proposed narrowing of streets in the village. Appreciating that the proposals are to help cycling traffic and reduce the number of cars, but submitter cannot see this discouraging traffic and feels it will only add to further congestion in the village.	CE Recommendation: Amend Figure 5.11: <i>Existing and Proposed Safe Routes to School</i> to remove junction numbers from the map.
SD-C367-221 Michelle Dagg		
SD-C367-222 Margaret Doody	One submission notes that the proposals will make it difficult for motorists, cyclists and pedestrians. Many of the ideas are unnecessary and dangerous. The proposals will cost a fortune and have to be undone in a few years. It will not cut down on people using their cars and will not cut down transport emissions.	
SD-C367-223 Martin O' Keffe		
SD-C367-224 Mary O'Neill		
SD-C367-225 Marie Kearns	One submission is worried at the opening of the new road at the bottom of the Neilstown Bridge from the Clonburris SDZ and its impact on traffic.	
SD-C367-226 Olga Dalgetty		

SD-C367-227 Tania Daly	One submission asks have the operators of larger vehicles and emergency services been consulted regarding the narrowing of roads. Motorists should also be consulted.	
SD-C367-228 Casey Family	One submission states that since the narrowing of Monastery Road it's rare to see a vehicle make a left hand turn without crossing the central white line and this is not safe. The submission is also worried that if car access is restricted in and around Clondalkin Village, estates will become car parks. The submission states that the road narrowing along Monastery Road has led to delivery and construction vehicles parking on the footpath and large vehicles slowing to a crawl when they meet a similar size vehicle. Clondalkin contains two nursing homes and a large health centre and people need their cars.	
SD-C367-229 Collins Family		
SD-C367-230 Halpin Family		
SD-C367-231 Keogh Family		
SD-C367-232 Sullivan Family		
SD-C367-233 Helen Spall	Another submission states that they were in a situation where a road was narrowed and there was an accident, and the traffic came to a halt both sides of the road. There was nowhere to give way to let the emergency services through. Similarly, if two buses meet each other, there is not enough room for them to pass.	
SD-C367-235 Floraville Residents	Junction Proposals	
SD-C367-234 Lisa O' Neill	One submission asks if there are added transport routes? and states that also relating to any junctions that allow left and right turns, they would strongly disagree with changing these from 2 way movement to only left turns, or only right turns, i.e. restricting traffic movements,	
SD-C367-200 Clondalkin Residents		
SD-C367-139 ronan duffy		

SD-C367-122 William Kearney	One submissions objects to the following as they would impact disabled people getting around the village; Narrowing of the junction Orchard and Monastery Rd The narrowing of the roundabout at the top of Woodford/Monastery Rd The removal of the left turn slip lane at the junction of the Ninth Lock/New Nangor Rd The reduction in junction sizes around the village including New Road and Knockmeenagh Rd Junction changes at New Rd/ Newlands Way Junction changes at Boot Rd/ Moyle Crescent Junction changes at Boot Rd/ St Johns Rd Reduction in Junction Radii / removal of left filter lanes One submission opposes reduction in junction radii for the following reasons; anti-safe measure with the purpose of dissuading drivers from being on the roads, it has not been risk assessed for causing accident compared to the old/current design. The submission points out that for good reason, many years ago, street designers created wide and long Radii currently in place. They did so as it was the safe option. They took account of the need of larger vehicles (Van, Bus, Truck, Fire Brigade) to negotiate these corners safely. This means providing space for the larger vehicle to	
------------------------------------	---	--

	turn left without the need to move to the other side of the road so as to position the vehicle to take the turn, -an unsafe and unnecessary manoeuvre which puts cycles at risk. Reduction of corner radii does not take account of the view of the large vehicle driver. Provision must be made for all vehicles to turn safely. The submission notes that all vehicles will need to use all the roads including delivery trucks, council Vehicles, buses, clue Light Vehicles, and others One submission objects to the reduction of junction sizes at six vital village areas and indicates they can see no purpose for this. Another submission does not agree that making junctions narrower or removing left hand slip lanes is the solution. The submissions that these solutions only adds to traffic congestion and causes difficulties for larger vehicles, such as bin lorries or emergency vehicles, accessing roads, and cites the example of the issues on the Bawnogue Road in recent weeks with the narrowing of the main road and narrowing of the entrance into Lealand estate. The submission states the zebra crossings or pedestrian crossings could be introduced to make it safer for pedestrians crossing. It also notes that reducing the junction radii so that vehicles have to make almost a 90 degree turn seems to cause more problems with cars swinging wider to make the turn. One submission states that the closure of this slipway will result in increased gridlock	
--	---	--

	Laurel Park Multiple submissions also oppose the narrowing of the top/bottom of the road. They state that it is already a struggle to get up and down the road, because of parents collecting children from the Crèche, keg delivery to the Laurels pub, and take away delivery drivers using the road for parking. The submissions argue that this proposal will make the situation much worse. Narrowing of Junction at Monastery Road/ Orchard Road One submission notes that this junction also has a lane for Main Street. At present it is a very tight squeeze, barely allowing 2 small cars to get through and if a bus is going through it becomes a single lane. Roundabout at the top of Woodford/ Monastery Road A number of submissions object to the proposed traffic restrictions in particular the further narrowing of the roundabout at the top of Woodford/Monastery Road. This would lead to congestion particularly in the evening in traffic from the New Nangor Road and the M50 when it is already impossible to get out of Woodford/Monastery Estate. This roundabout cannot be made any less accessible. Another submission notes that this roundabout has already been disastrously narrowed, where buses have to mount the roundabout to get around it and suggest that it should in fact be opened to two lanes again to help the flow of traffic.	
--	--	--

	One submission notes that plan mentions making the Woodford Roundabout more "compact" & doesn't expand on what the actual plan is. It goes on to say that the works made to the Roundabout on 2020/2021 are a failure. The submitter notes that they have spent over 20mins at 6pm on weekdays travelling from Boomers to the top of Woodford Hill. The submission further notes that the constant traffic here has now forced more residents & traffic to travel along Watery Lane & through the village to get to their homes. Removal of Slip Lanes at the junction of Ninth Lock Road and the New Nangor Road A number of submissions note that this slip road enables traffic to clear the Ninth Lock Road and to keep backups at a minimal thereby keeping the flow going. The increased traffic will create additional air pollution. Anti-Car Policy A number of submissions object to the anti-car policy. One submission notes that the staunch and rigid anti-car policy singles people with reduced mobility (knee, hip) who are not officially disabled but will no longer be able to access services/facilities in the village (there is a large cohort of the population possibly the majority of people over the age of 55. I refer to those with reduced mobility. This includes those with knee and hip issues, those with respiratory issues etc. Other submission states it is the motorist that pays for roads tax, not cyclists or E scooters. Specific Traffic Management Issues	
--	---	--

	One submission expresses concern about heavy vehicles passing by the Round Tower and along Tower Road in general. One submission requests that additional infrastructure should interfere with the St Patricks Day Parade. This should be stated in the plan. ARUP Report A number of submissions comment specifically on the options for traffic management contained with the LTP which accompanies and supports the Local Planning Framework. Relating to 5.6.3.4 General Traffic the preferred strategy outlined in HI6 the submission notes a number of potential issues: - Clondalkin Local Transport Plan, part 4 - Local transport plan - HI6 proposal for amendment to traffic flow to the village. This proposal will not solve the congestion problem in the village. While it will increase access for pedestrians and cyclists it will move the congestion problem to other areas of the village. - This proposal only allows for traffic accessing Tower Road to turn left onto the Old Nangor Road. This road will experience a significant increase in traffic volumes, particularly at school times, further compounded by traffic accessing the new primary schools under construction on the Old Nangor Road.	
--	---	--

	- The junction of the Old Nangor Road with the Fonthill Road is a left turn only. This junction is not designed to accommodate such volumes of traffic. Additionally, this will also impact the small "roundabout" at Cherry Wood Avenue, which is already difficult and dangerous to navigate with current traffic levels. - The proposal of HI6 will also lead to people using the car park of the mill shopping centre to access Ninth Lock Road. With a left turn only from Tower Road, those wanting to access Ninth Lock Road will turn from the Old Nangor Road into the mill shopping centre and then use the other exit to access the Ninth Lock Road. Although the access point on the Old Nangor Road could be closed to avoid this, that is not a good solution either, as that leaves only one entry / exit point to an already busy car park, and would make access to the mill very difficult for a lot of people who may have to travel a significant distance to get around the outskirts of the village into the carpark. Additionally, it would lead to large amounts of traffic on the Ninth Lock Road on approach to the mill. - Finally, the submission suggests that alternative suggestion, HI4, although not ideal, is a better alternative if one has to be selected. It would avoid additional congestion both within and on approach to the mill and would disperse traffic from Tower Road so the Old Nangor Road is not impacted so greatly by the change.	
--	--	--

	A number of submissions came from those who live on St Brigids Road, located to the south of the Local Planning Framework (LPF) boundary. A similar petition was received with 201 signatures from businesses within the Clondalkin Village Centre. The submission states that the proposed changes identified in the Local Planning Framework would have major negative impacts on residents of all areas moving around the village, which will have major impact on local businesses in the centre of the village. At present, Clondalkin experience gridlock most school days at opening and closing times, with the proposals only exacerbating the problem according to the submissions. The main points of contention are: - Narrowing the junction between Orchard Road and Monastery Road. - Further narrowing the roundabout at Monastery Road and Woodford Road. - Reduction in all junction sizes around the village. The submission states that private vehicles are a necessity and are used by many families for several purposes. The LTP aims to close off certain routes around the village, reduce road widths and junction sizes resulting in making it extremely difficult for many people to live quality lives as their car becomes a burden. Most cars now have very low emissions, and many are electric so this plan will make no significant difference to carbon emissions. The submission urges the council to re-think the transport proposals as they	
--	--	--

	have negative consequences on the daily lives of ordinary people. A resident from St. Johns Wood has made a comment on the Local Transport Plan (LTP), completed by ARUP. They object to the following three sections of the LTP: - Section 5.6.1.1 Walking (WK11, Reduction of unction corner radii at Boot Road / St. Johns Wood) - Section 5.6.1.2 Cycling (CY13, Reduction of corner radii at Boot Road / St. Johns Wood) - Section 5.6.11.4 General Traffic, Reduction of corner radii at Boot Road / St. Johns Wood. The basis of the objection on the following sections is as follows: 1. With 100 housing units located in St. John's Wood housing estate, 45 residential houses approx.. along St. John's road and 44 new apartments being commissioned at present (total 199 residents), the proposed interventions reducing the estate entrances will effect all residents. 2. Since the construction of the HSE Primary Clinic 2 years ago, there have been restrictions on the junction, making it almost impossible for Waste Collection trucks/ Fire Brigade and Ambulances to enter this cul de sac. There are	
--	---	--

	no double yellow lines installed at the junction which was installed by SDCC and was not raised by Arup Consultants in their report. This proposal is contained within the Arup Local Transport Plan attached to the Draft Clondalkin Local Transport Plan where the proposal for the reduction of this junction and its impact on residents has not been properly communicated to any of the existing residents of St. John's Wood/Road/New apartments by SDCC.	
SD-C367-94 Transport Infrastructure Ireland	SM9 Objective 4 TII recommends the following changes to SM9 Objective 4; To work with the wider community, in conjunction with the NTA and TII <i>having regard to compliance with relevant TII publications or DMURS as appropriate</i>, to reduce through traffic in the village by encouraging mapping app providers to limit diversions through the village centre at morning and evening traffic peaks.	CE Response: The content of this submission is noted. The Draft LPF will be introduced to the County Development Plan (CDP) through a Variation. All policies and objectives within the LPF are aligned to the CDP as required in the hierarchy of planning policy documents. It is not considered appropriate to repeat the broader policy and objectives of the CDP throughout the LPF. As provided for in the CDP, all policy and objectives are compliant with TII publications and DMURS. These are provided for in SM5 Objective 2 (DMURS) and SM6 Objective 4 (TII publications). It is considered that the inclusion of reference to TII publications or the proposed design manual within this objective is not required given the focus of the objective. CE Recommendation: No change to Draft LPF.
SD-C367-174 HSE	Primary Care Centre The HSE ICPOP have highlighted access issues to and from the Clondalkin Primary Care Centre, with no	CE Response: The content of this submission is noted.

	yellow box located at the entrance / exit making it difficult for service users to access the centre. They have also highlights that members of the public are parking on the footpath and in Primary Care Centre parking spaces during school drop off / pick up times blocking access for pedestrians and service users.	The LPF includes a number of measures to help reduce the dominance of the car at school times. Should these be approved they will have the potential to reduce the pressure of car parking on surrounding areas. The use of private car parking spaces is a matter for the operator. Regarding car parking on pavements, the Council's transport section would welcome further engagement with the HSE and will liaise with the Gardai where appropriate. CE Recommendation: No change to Draft LPF.
SD-C367-197 Rhona Kerins SD-C367-183 Nicola Flynn SD-C367-187 Margaret Caddle SD-C367-173 Ann Gilsenan	Parking A number of submissions state that lack of parking is a huge issue in the village with the result that people no longer want to come to the village to shop unlike Crumlin and Ballyfermot where there is plenty of parking and the villages are thriving. Clondalkin has lost all banks except AIB & there are no restaurants or nice shops (except a very few) left to encourage people to browse & shop in the village. The submission notes that pubs are not restaurants. One submission notes that the lack of parking restricts older people and people who have mobility issues prevents people from going into the village. One submission states accessible parking is needed.	CE Response: The contents of these submissions are noted. As part of the LTP, a parking utilisation study was completed which identified that the mean occupancy of car parks within the village was 52%. Only 4 of the 12 car parks within the village centre highlighted occupancy 100% or above, this was due to cars circulating or waiting for occupied spaces to become free. Given the results of the car parking survey, there is no lack of parking within the village centre and throughout the LPF boundary. As part of the Village Enhancement Schemes (VES), the need for further accessible parking will be examined, with the aim to create additional parking for those with accessibility issues. CE Recommendation: No change to Draft LPF.
SD-C367-191 Jamie Thompson	General The submission suggests ways to promote road safety and car alternatives including:	CE Response: The submission is noted and welcomed. The council understands there are requirements for additional measures to be provided in order to reduce car movements within the

	– Reduction of speed to 30kmh – Enforcement measures such as fixed speed cameras – Traffic reduction measures – Implement measures and restrictions to prevent Clondalkin and Fonthill Road being used as a bypass for the M50 and Outer Ring Road. The submission notes the Outer Ring Road has a mode of failure due to a bottleneck between Grange Castle and the N4 Lucan Woodies junction (including the Pennyhill Pub) as the dual carriageway is compressed which limits its effectiveness.	LPF boundary. The preferred strategy emerged through an iterative process aimed at achieving the objectives of the LTP, in the context of the assessment of the current movement characteristics and particular movement issues identified within the Plan area. Emerging options were subject to consultation with the local community and stakeholders. This consultation resulted in consideration of alternative options which were more acceptable to the local community. The preferred strategy provides interventions which can be assessed over time against the objectives of the LTP. Other options, which involved more significant interventions within the village centre, with the aim of reducing through traffic and congestion to the greatest extent possible and maximising modal shift were not preferred at this time but can be re-assessed at a future time should it be necessary. The preferred strategy is a low impact one which focuses on targeted measures which go some way to reducing the dominance of the car, enabling safe walking and cycling, increasing connectivity to key destinations, facilitating improved public transport and infrastructure. It includes measures to improve safety around schools and improve connectivity between Clondalkin Village and its surrounding residential areas. Many of the interventions stated within this submission are catered for including the 30 km/h speed limit and traffic reduction measures. Implementation of measures and restrictions to prevent Clondalkin and the Fonthill Road being used as a bypass for the M50 and Outer Ring Road are more difficult due to the national roads (M50), falling under the remit of TII. SM9 Objective 4 can be viewed as a community objective, to reduce traffic being diverted towards Clondalkin Village at
--	---	--

		peak travel hours. It should also be noted that bottlenecks between Grange Castle and the N4 Lucan Woodies Junction are noted, and while falling outside the boundary of the LPF would have been included in modelling undertaken for the LTP influencing the preferred plan. The introduction of Fixed Speed Safety cameras falls outside the remit of the LPF, falling under the supervision of An Garda Síochána. CE Recommendation: No change to Draft LPF
SD-C367-72 Land Development Agency	Mobility Hubs The LDA welcomes the inclusion of SM10 Objective 1 and SM11 Objective 4, which will provide a strengthened policy basis to provide alternative transport options.	CE Response: The content of this submission is noted and welcomed. The Council will continue to engage with Developers of sites within the LPF boundary in providing alternative transport options for the community. CE Recommendation: No change to Draft LPF.
SD-C367-143 Brian Ronan	General The submission states that there is nothing in the LPF to address the traffic issues.	CE Response: The content of this submission is noted. Chapter 5 within the Draft LPF highlights that the preferred strategy emerged from an iterative process aimed at achieving the objectives outlined in the Local Transport Plan (LTP), with the emerging issues subject to 3 rounds of public consultation with the local community. As highlighted in Section 5.5 of the Draft LPF, the consultation resulted in consideration of additional options which were more acceptable to the local community following consultation. The preferred strategy provides interventions, the success of which can be assessed over time against the objectives of the LTP. Other options, which involved more significant

		interventions within the village centre, with the aim of reducing through traffic and congestion to the greatest extent possible and maximising modal shift were not preferred at this time but can be re-assessed at a future time should it be necessary. Therefore, the preferred strategy is a low-impact one which focuses on targeted measures which it is intended will go some way to reducing the dominance of the car, enabling safe walking and cycling, increasing connectivity to key destinations including schools, facilitating improved public transport and infrastructure. CE Recommendation: No change to Draft LPF.
SD-C367-144 Clondalkin Dental	General The submission from Clondalkin Dental states that their practice has access challenges (both patients and staff) due to: – Limited on-street parking near Tower Road – Heavy congestion in the village core at peak hours – Reliance on nearby shared car parks (Tower Parade / AIB / Mill Centre) for patient parking. Many of our patients are elderly, disabled, or parents with young children, who cannot reasonably be expected to travel on foot or by bicycle for medical appointments. – Staff often carry equipment or materials that make public transport or cycling impractical. The submission has concerns with the LPF proposal to:	CE Response: The Council welcomes the support for the overall vision of creating a safer, greener, and more vibrant Clondalkin noting the concerns raised in the submission. The Draft LPF will aim to enhance movement through Clondalkin village for all transport mode users. As established at the third round of public consultation, the LPF would not include bus-gates, no additional one-way streets and no new pedestrianised streets. Though these were assessed as part of the Local Transport Plan (LTP), these measures were not deemed acceptable during the pre-draft public consultation process. The Draft LPF will not reduce parking spaces at Tower Parade and Tower / Mill centre or introduce extensive traffic calming and circulation restrictions which reduces accessibility. As part of the proposed Village Enhancement Schemes (VES), the need for further accessible parking will be examined, with the aim to create additional parking for

	– Reduce or reorganise parking spaces in Tower Parade and Tower/Mill Centre – Introduce extensive traffic calming and circulation restrictions which reduces accessibility The submission requests that the council: – Guarantee the retention of sufficient short-stay, accessible parking spaces within immediate walking distance of Tower Road – Provide staff permit parking solutions – Ensure that traffic calming measures allow for patient drop-off / pick-up zones directly adjacent to healthcare providers – Include a policy commitment in the LPF that essential healthcare facilities will not be disadvantaged by public realm or traffic interventions. The overall vision of creating a safer, greener, and more vibrant Clondalkin is supported, however, the council needs to protect parking and access to healthcare facilities.	those with accessibility issues, which will directly benefit any businesses operating in the village centre. This will be subject to public consultation under Part 8. The LPF also includes the introduction of other measures such as the 30Km/h speed limit, which will also be subject to public consultation. These different measures will facilitate options to encourage a reduction of traffic within the village. CE Recommendation: No change to Draft LPF.
--	---	---

Chapter 6: Community, Homes and Employment

Education		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-163 Department of Education & Skills	Education The Department of Education and Youth (the Department) welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasises the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose. The Department notes and welcomes the following Community, Homes and Employment Objectives: CHE2 Objective 1: <i>To facilitate the delivery of planned new schools, expansions or refurbishments within the LPF area and within the wider school catchment area serving Clondalkin as needs are identified by the Department of Education and Youth.</i> CHE2 Objective 2: <i>To promote and support the co-location of pre and after-school childcare facilities at primary schools and the use of primary and post-primary school premises and sports facilities for community use outside of school hours.</i> CHE2 Objective 3: <i>To continue to engage with the Department of Education and Youth to promote and</i>	CE Response: The contents of this submission are noted. The Council also welcomes the ongoing engagement with the Department of Education and Youth, including the liaison which resulted in the identification of reserved school sites which are included in the County Development Plan. The growth outlined in the LPF for this area of Clondalkin reflects the envisaged growth for the area within the County Development Plan, noting that the Ninth Lock Framework site will accommodate the greatest share of this growth. As set out under Section 6.3 Homes and Growth, there has been limited growth in the Clondalkin LPF area over the last Census period, with an increase in population of just 0.64% between 2016 and 2022. While revised targets were issued to local authorities in July 2025 and the target for South Dublin County is now 3,270 units annually up to 2034, the potential within the LPF area continues to lie largely within the framework site along Ninth Lock Road at the old CB packaging site, estimated at over 1000 units based on the application of densities set out in the Sustainable Residential and Compact Settlement Guidelines 2024. Smaller sites also have potential to

	<i>support the delivery of new, expanded or refurbished primary and post• primary schools within Clondalkin as required to meet identified needs.</i> <i>CHE1 Objective 1: To facilitate the expansion and enhancement of existing community facilities and/ or the provision of new community facilities where required, in tandem with population growth that meets the needs for current and future residents.</i> It is recognised that the purpose of the variation is to include the Framework Plan for Clondalkin in the South Dublin CDP 2022-2028. The Department has indicated that there are currently ten schools (seven primary and three post-primary schools) located in Clondalkin. The Department further indicates that it would be their preference to expand these existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. The Department note that, in the context of future population trends and their potential impact on school place requirements, the variation refers to the population growth identified for Clondalkin in the recent draft South Dublin County Development Plan 2022-2028 and that the Department made its submissions to the CDP regarding Clondalkin on the basis of the potential population growth within the settlement and its environs between 2022 and 2031.	provide for infill development throughout the plan lands. The delivery of housing within the sites identified as framework sites in Chapter 8 and other infill sites will continue beyond the life cycle of the 2022-2028 CDP, noting that the potential for any development in Knockmeenagh is not realisable at this time and would require a separate process for rezoning were it to be realised. The Council engaged with the Department of Education and Youth during the preparation of the Draft LPF. This engagement and analysis by the Department to the Council on the Clondalkin LPF concluded that there was an overall reduction in demand for primary school places within the Clondalkin School Planning Area PA. It was further submitted by the Department that the distribution of school locations is not optimal and if the demand increases the correct location for a new primary school would be West of Clondalkin Village in the Deansrath / Fairview area. The Council notes the Department’s acknowledgement that the indicated potential increased requirement for school places at primary level for the next ten years – based on the potential population growth to 2034 – is of a level that could be accommodated by the planned new school campus for Gaelscoil Chluain Dolcain and Gaelscoil na Camoige. Furthermore, at post-primary level, the Council also notes that the Department consider that any potential projected increase in school place requirements could be met by expansion of the existing facilities, if required.
--	---	--

	It is noted that the population scenario envisaged in South Dublin overall is the high NPF target of an additional 45,002 persons by 2028. A projected population growth in the LTP of approximately 5,200 to 5,400 is understood resulting in a projected population of about 18,296 from a Clondalkin Census 2022 figure of 13,058. It is further noted by the Department that there is a projected development of 1,940 residential units, 50% of which will be developed in the Ninth Lock Framework Area. It is indicated that if the growth materialises it could result in a additional requirement for school provision in Clondalkin. The Department also refers to the NPF forecast assumptions and that these forecasts are in line with the assumption that up to 1,000 units will be built by 2034. The Department further notes that the current NPF review has the potential to allocate a further projected population increase beyond what is stated in the LTP. The Department of Education and Youth submits that, in the context of potential future school place requirements for the next ten years based on the potential population growth to 2034, there is an indication of potential increased requirement for school places but it is of a level that could be accommodated by the planned new school campus for Gaelscoil Chluain Dolcain and Gaelscoil na Camoige. The Department further state that at post-primary	In terms of school place provision to serve anticipated future growth, the Council also notes the Department's preference to expand the existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increaseThe Council also notes that the Department do not indicate the requirement for a school site designation within the Draft LPF lands to meet any potential increased requirements. It is worth noting that the CDP 2022-2028 identifies a site for a new primary school within the grounds of Deansrath Community College, to the west of the Draft LPF area. Further correspondence with the Department since their submission has confirmed that there is no requirement to reserve any additional land within the Clondalkin LPF boundary for additional school place provision. CE Recommendation: No change to the Draft LPF.
--	---	---

	level, there is a potential projected increase in school place requirements which could be met by expansion of the existing facilities, if required. The Department highlight the importance of schools as enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Further to this, the Department submits that other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities be complimentary to each other for the benefit of the whole community. The Department states that all enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools, including road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities. The Department of Education and Youth note that it is not within their remit to develop or fund this enabling infrastructure.	
SD-C367-163 Department of Education & Skills	Education In terms of assessing current and future capacity, the Department of Education and Youth highlight the need to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place	CE Response: The contents of this submission are noted and acknowledged. CE Recommendation:

	provision and could necessitate reassessments of school place provision from time to time. The Department sets out its intention to engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location.	No change to the Draft LPF.
SD-C367-163 Department of Education & Skills	Education – Special Needs The Department of Education and Youth anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future throughout the country, and this may result in schools requiring additional accommodation or space to meet this growing need. The Department has indicated that they engage closely with the National Council for Special Education in relation to the forward planning of new special classes and additional special school places. The Department further submits that the National Council for Special Education (NCSE) has a statutory function to plan and co-ordinate the provision of education and support services to children with special educational needs, in consultation with the relevant education partners and the Health Service Executive (HSE) and this includes the establishment of special class and special school placements in various geographical areas where there is an identified need. The Department and the NCSE are working with schools and patrons to make increased provision for	CE Response: The contents of this submission are noted and acknowledged. The Council is committed as per CHE2 Objective 1 and CHE2 Objective 3 to working with the Department of Education and Youth to support the delivery of additional and refurbished school accommodation to meet school place requirements including special school placements. Notwithstanding this, the Council welcomes the Department of Education and Youth's request for more explicit support within the Draft LPF in this regard. CE Recommendation: Insert a new objective into the Draft LPF: CHE2 Objective 4: <i>To continue to engage with the Department of Education and Youth to support the provision of school accommodation for children and young people</i>

	children with special education needs, both in special classes at mainstream schools and in special schools. In this regard, the Department submits that at post primary level, all schools have been advised to plan for an average of 4 special classes, and at primary level, the focus is on ensuring appropriate provision at all medium to large primary schools (8 mainstream classes or more) in the first instance. The Department further submit that most special classes are established in existing accommodation and where there is a further requirement within that accommodation, additional capacity can be catered for through the provision of extension facilities. The Department also note that in recent years there has been an increase in SEN school place requirement, which has led to the establishment of 11 new special schools since 2019, and with five more due to be established for the 2025/26 school year. The Department sets out its intention to consult with the Council if and when additional special education needs accommodation or sites for future special schools are required within specific locations. In the context of this Local Planning Framework and being mindful of a substantial population growth that may arise from the various future planned housing developments within the Clondalkin area and its surrounds, the Department states that it would welcome explicit support within the plan for the provision of school accommodation	<i>with special educational needs within Clondalkin as required to meet identified needs.</i>
--	---	--

	for children and young people with special educational needs.	
--	---	--

Children's Play Facilities		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-55 Cllr Francis Timmons	Children's Play Facilities A duplicate submission requests adding 'older estates to playspaces' to CHE4 Objective 1.	CE Response: It is considered appropriate to amend CHE4 Objective 1 to ensure that existing estates are considered for play provision in accordance with SDCCs play policy.
SD-C367-56 Cllr Francis Timmons	Another submission makes the recommendation that a playspace in the green area between Floraville and Monastery Rise is needed as many young families live in two estates and in the new apartments on the Monastery Road.	CE Recommendation: Amend CHE4 Objective 1 on page 57 and page 116: From <i>To continue to deliver on play spaces within Clondalkin, ensuring that new residential and mixed-use developments include play spaces to the standard required as part of their design and delivery.</i> To <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.</i>
SD-C367-130 Gill Malone		

Healthcare		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-56 Cllr Francis Timmons	Healthcare A submission requests the inclusion of the following objectives; - Objective for a dedicated Clondalkin youth service facility. - Objective to develop and encourage Clondalkin as an Autism Friendly Town. - Objective to make Clondalkin fully wheelchair accessible and include strollers and walking aids.	CE Response: The submission is noted. There are two organisations providing youth services within the Clondalkin area, these being Crosscare and DDLETB. Their services range from education, sporting, recreational and developmental programmes, projects and services to disadvantaged young people to education and employment support, drugs and alcohol support, health and wellbeing support alongside activities such as arts, sports, outdoor learning, music, drop-ins, mentoring etc. As such, there is an existing range of youth services in Clondalkin. In terms of additional provision, it is considered that any additional youth service provision would be better incorporated as one of a core number of end user community services to be located in a multi-purpose community facility. It should be noted that a community facility is included as an objective in the Ninth Lock Framework site. Any future provision would also need to be agreed with DDLETB as a youth service funder and operator. While the intent to develop Clondalkin as an Autism Friendly Town is welcomed it is not something which can be realistically delivered as part of the Local Planning Framework as a land use plan. This is something which

		would be better considered as part of the Local Economic and Community Plan (LECP) for the County and for various businesses to participate in. The intent to make Clondalkin fully wheelchair accessible and include strollers and walking aids is acknowledged. The proposals within Chapter 5 on Sustainable Movement support the intent with objectives to widen footpaths where feasible. Notwithstanding that this is not always feasible due to the space restrictions within the existing movement network, it is considered that SM2 Objective 1 in Chapter 5 should be amended to explicitly include for universal access. CE Recommendation: To amend SM2 Objective 1 on page 44 in Chapter 5 Sustainable Movement: From SM2 Objective 1: <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 where feasible, and an attractive public realm facilitated by village enhancement schemes.</i> To SM2 Objective 1: <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</i>
--	--	--

		<i>footpaths to support universal access where feasible, and an attractive public realm facilitated by village enhancement schemes.</i>
SD-C367-174 HSE	Healthcare The HSE have raised awareness of policy documents and resources that should be considered when developing the Local Planning Framework (LPF). The following policy documents / websites / videos were attached in relation to the following topics: ☐ Age Friendly Health Systems – 4Ms ☐ HSE and Department of Health Blueprint ☐ Health Assets and Needs Assessment (HANA) Project Round 3 ☐ The Irish Longitudinal Study of Ageing (TILDA) ☐ Central Statistics Office (CSO) Older Persons Information Hub ☐ Dementia Friendly Communities ☐ Age Friendly Design for Public Buildings and Healthcare Centres The HSE ICPOP have indicated that it would be great to progress the plan for Clondalkin to be considered a Dementia Inclusive Community, which would create partnership projects between the HSE, SDCC and	CE Response: A number of policy documents and resources have been referenced by the HSE for consideration in the Plan. These are welcomed noting that some are reference documents e.g. TILDA and CSO information hub, others are more directly related to design at project stage. The LPF has included a number of objectives in different chapters of the Plan which recognise the needs of different cohorts of the population. This includes needs around housing, universal access, social inclusion and seating. The planning authority would welcome engagement with the HSE on the creation of partnership programmes, including for a dementia inclusive community. It is considered that this can be progressed outside the LPF process. CE Recommendation: No change to the Draft LPF.

	other key stakeholders in the area, including An Garda Síochána.	
--	--	--

Future Community Facilities		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-145 Red Network	Future Community Facilities The submission welcomes CHE9 Objective 1 and the provision of new community facilities for the Ninth Lock Framework Site. Requests to include the RIC Barracks for new community facilities to help ensure the building is preserved.	CE Response: CHE9 Objective 1 states: <i>To ensure the provision of appropriately sized and purpose-built community facilities as part of future development of the Ninth Lock Framework site (CB Packaging site) adjacent to the Ninth Lock Road, to serve new and existing populations and to facilitate good placemaking and social integration of the existing village with new residents.</i> The RIC barracks is identified as an opportunity site within the LPF, and consideration is given to the types of uses that it might be put to should the opportunity arise. These are described in Chapter 8 Urban Design Strategy in the LPF but are not exhaustive, as: The re-use of the building as residential could be considered. Similarly, consideration could be given to the adaptive reuse of the building for non-residential uses such as community/ art/ afterschool or combined with potential heritage building use. Commercial uses aligning with

		heritage status of the building such as art studio's, architectural or related businesses might also be considered. CE Recommendation: No change to the Draft LPF.
--	--	--

Housing Mix		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-145 Red Network	Housing Mix Relating to the development plan objective (H1 Objective 2), the submission suggests that social housing could be increased to a minimum of 50%, given that the LPF area has a lower than average percentage of social housing. Likewise, the provision of social housing should be prioritised in CHE13 Objective 1.	CE Response: H1 Objective 2 in the County Development Plan states: <i>To require that 20% of lands zoned for residential use, or for a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021 and the Planning and Development Act 2000 (as amended)</i> The objective reflects the requirement under the Planning and Development Acts under Part V. While an increase in social housing is permitted it is not required under the Planning Acts. Both the LPF and the County Development Plan look to achieve a balance in tenure in any given area. It is considered that this is an appropriate approach to housing and does not prevent an increase in a given area provided there is

		demonstration of a mix within the wider area defined in the CDP H1 Objective 13: <i>To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) and the provisions of the Housing Strategy and Interim HNSA or any subsequent future Regional based HNSA.</i> Having regard to the existing policy it is considered that no change is required. CE Recommendation: No change to the Draft LPF.
--	--	--

Density		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-111 Katie Goodwin	Density One submission has concerns about framing Clondalkin as a "city - urban neighbourhood" and	CE Response: A number of submissions have indicated concerns at the density ranges outlined for the Ninth Lock Framework site.

SD-C367-179 Margueritte Sherry SD-C367-151 Cllr Linda de Courcy	states it is a suburb on the outskirts of Dublin. It has traditionally been a low-density village which has contributed to its character. The dph range of 50-250 is wide and the higher end is quite concerning, it should be 40-80 dph or max 100 if there is public transport accessibility. The high rise apartment blocks at the Ninth Lock Framework site will not add to the character of the village, will increase congestion and increase the risk of flooding if green space is limited. Two submissions state that the density range for the Ninth Lock Site is excessive and its benefit to the area is not highlighted. A submission suggests that a low density, right size complex within Ninth Lock Framework Site would be more beneficial. Clondalkin is located at the outer edge of the suburbs of the Dublin Settlement and the development does not align with the Sustainable and Compact Settlements Guidelines for Local Authorities. The development is not included in any targets in the SDCC Development Plan. Development at Kilcarbery and the Strategic Development Zone have not been absorbed yet by Clondalkin village and are not represented in the figures included for social housing on Page 8. This needs to be revised. A table should also be included to show all housing units completed and under construction in the Clondalkin area with a breakdown of tenure type. It is stated that areas within the LPF	The Sustainable Residential and Compact Settlement Guidelines (the Compact Guidelines) were issued by the Department of Housing, Local Government and Heritage in January 2024. They replaced the Residential Density Guidelines 1999 and the Sustainable Residential Development in Urban Areas Guidelines 2009. The Compact Guidelines set out settlements, area types and density ranges. Clondalkin is within the Dublin City Metropolitan Area, and within an area defined as Dublin City and Suburbs. The Guidelines state: <i>The strategy for all cities is to support consolidation and intensification within and close to the existing built up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.</i> The density ranges for Dublin City and Suburb are set out in Table 3.1 of the guidelines. Within the ranges shown the applicable density for the Ninth Lock Framework site as a town centre site, is 50 dwellings per hectare (dph) to 250 dph, The Guidelines contain the following policy and objective: Policy and Objective 3.1 <i>It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are</i>
---	---	---

	have declined in the HP Deprivation Index between the last two Census periods and are now classified as being below average or disadvantaged. An analysis is needed to understand the causes and ensure that the plan supports local prosperity including housing tenure. One submission outlines that apartments for sale will help young people get on the property ladder and help locals downsize. The council should purchase the site to ensure the best interests of Clondalkin residents. Some submissions raise concern that recent developments are all for rent. It is suggested that the Ninth Lock Framework will continue this rental trend, which does not reflect the housing needs of the area. Census data should include the number of adults aged 30+ living in their family home. As required by planning law, developments should state the tenure types. The Watery Lane apartments under development highlights a failure to implement the current Development Plan's aspirations, with most planning conditions applied to the permission being quashed. Apartment living does not facilitate 'place making'.	<i>refined further at a local level using the criteria set out in Section 3.4 where appropriate.</i> However, the Guidelines provide for a refining of density within the density ranges based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment. Accessibility is defined within the guidelines based on certain distances to high capacity / high frequency / reasonable frequency public transport services, planned or existing. Figure 6.9 of the LPF provides a map of the accessibility analysis based on current walking distance to public transport. Accessibility can improve as new routes within development sites or other areas become available. On the basis of the Guidelines, the density range for the Ninth Lock Site indicated in the LPF is the relevant range as set out in the Guidelines. However, at planning application stage the refining of the density based on accessibility to public transport, and considerations of character, amenity and the natural environment will allow for more detailed examination of any planning application and the density appropriate to the site or to areas within the site. As part of any planning application the strategy for surface water is examined to ensure that there is no increase in runoff rates. This will involve an ecosystems approach to water management. Similarly, a site specific flood risk assessment will be required to ensure that there is no increase in the risk of flooding. There are relevant objectives
--	---	--

		for surface water management and flooding in the LPF and the associated SFRA of the LPF. The figures on page 8 of the LPF present an overview of the housing stock and mix within the LPF area based on Census 2022 data. While it would be possible to analyse the Census for further information the figures provided an overview for the purposes of the introductory chapter of the LPF. The Council's Housing Supply Monitor provides updates on the status of housing development within the County, including Clondalkin the link to which is Housing Supply Monitor. This monitor indicates the progress of the county towards the targets set out in the County Development Plan, including Clondalkin which is within the Clondalkin, Clonburris, Grange Castle neighbourhood area in the core strategy of the CDP. While within the same neighbourhood area identified in the CDP, Kilcarberry and Clonburris SDZ are outside the LPF area for the purposes of this variation which sets a framework for Clondalkin village and immediate environs. The Watery Lane apartments have been the subject of enforcement which is not something for the LPF. A submission suggests that apartments for sale will help young people get on the property ladder and help locals downsize is noted. There is concern expressed that the Ninth Lock site will follow the rental trend and not meet the needs of housing in the area. The LPF includes the following objective: CHE13 Objective 1: <i>To support the provision of a mix of tenure types within Clondalkin LPF in creating suitable</i>
--	--	---

		<i>accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social 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</i> However, while the local authority has control of its own housing development and tenure, it cannot dictate the tenure of privately developed housing. There is no requirement in planning law to state the tenure types, other than where a developer was planning to develop ‘build-to-rent’. This category of development is no longer provided for as a distinct type of development. An analysis of the Pobal Deprivation Index of Census 2022 small areas within the LPF, as shown in Table 6.1 of Chapter 6, indicates that there are a number of small areas within the LPF which are marginally below average with the majority of the remainder marginally above average. Objectives CHE8 Objectives 1 and 2 outline the support for delivery of facilities to help towards an improved quality of life and social inclusion in Clondalkin. It is considered that the LPF has included for a tenure mix to the extent possible and has correctly identified the density range for the Ninth Lock Framework site. CE Recommendation:
--	--	---

		No change to the Draft LPF.
--	--	-----------------------------

Housing Options		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-72 Land Development Agency	Housing Options The Land Development Agency has outlined their role as a commercial, state-sponsored, body set up by government with two main functions: - To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and - To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability. They state they are currently working with SDCC on a number of sites. The LDA acknowledge they have been referred to as a current provider of cost-rental housing within the LPF, noting that for Clondalkin this would equate to an annual net household income below €66,000, the threshold for Dublin. However, they believe a supporting objective could strengthen its position if suitable sites become available within	CE Response: The contents of the submission are noted and the overall support of the LDA for the progression of the Draft LPF is welcomed. The Draft LPF currently includes the following objectives which are relevant to the submission and to the request for a further objective. These are: CHE11 Objective 1: <i>To ensure that proposed development provides for an appropriate mix of housing typologies to support sustainable communities within the LPF area having due regard to the context of the site within a given area and the need to deliver appropriate densities in line with the Sustainable Residential and Compact Growth Guidelines 2024.</i> CHE11 Objective 2: <i>To support compact ‘own door’ typologies to deliver a more diverse and affordable form of housing which can support medium density development either on its own or in combination with higher residential development schemes, as appropriate to context.</i> And

	the LPF area. The following objective is suggested for inclusion within Chapter 6: Community Homes and Employment, under CHE13: Housing Options as CHE13 Objective 2: CHE13 Objective 2: <i>To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, to cater for the varying housing needs and economic circumstances of Clondalkin, to be delivered by, or in partnership with, approved housing bodies, the Land Development Agency, or other relevant providers.'</i>	CHE13 Objective 1: <i>To support the provision of a mix of tenure types within Clondalkin LPF in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social 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.</i> Therefore, the LPF has already provided objectives dealing with the need for a suitable mix of tenure, typology and size. In terms of delivery, it is considered that the request by the LDA could be accommodated in a revised CHE 13 Objective 1. CE Recommendation: To amend CHE13 Objective 1 from: <i>To support the provision of a mix of tenure types within Clondalkin LPF in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social 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.</i>
--	--	--

		To <i>CHE13 Objective 1: To support the provision of a mix of tenure types, housing sizes and typologies within Clondalkin LPF in 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.</i>
--	--	--

Retail		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-77 Mick Hallows	Retail The submission states the council should reduce the number of takeaways and vape shops in the Village. Kids are buying vapes, loitering around takeaways and littering. Government fails to protect vulnerable communities, as they lure kids in by having vape shops and sweet shops beside each other.	CE Response: It is understood that the government is intending to bring in new legislation which would regulate the sale of vapes and to make it less attractive for children. The County Development Plan includes objectives to manage the provision of fast-food outlets and takeaways in our urban areas. Objectives around Vape shops can be further

		considered as part of the next County Development Plan process. CE Recommendation: No change to the Draft LPF.
--	--	--

Miscellaneous / Out of Scope		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-191 Jamie Thompson	Miscellaneous / Out of Scope The submission suggests stronger enforcement and increased detection against daily incidents of vandalism, littering and fly-tipping.	CE Response: The issues raised are noted. However, this is outside the scope of the LPF. Any littering or fly-tipping should be reported to the Council's litter section. CE Recommendation: No change to the Draft LPF.

Chapter 7: Conservation and Built Heritage

Character and Structure		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Urban Character In relation to the third paragraph in Section 7.3 on Page 73, the submission states the original vernacular house roofing 3 generations ago was of thatch, not 'slate or tile'.	CE Response: The third paragraph on page 73 is referring to existing condition only where 'roofs are typically pitched, slated, with expressed gables, in the vernacular style'. No mention of 'tile' is referred to. CE Recommendation: No change to Draft LPF.

Architectural Conservation Areas		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Architectural Conservation Areas In relation to CBH2 Objective 1, the submission queries whether the council will include the roadway and paths on both sides of Orchard Road in the Village Centre ACA. It notes that the curve and rise of the road closely echo an early Christian fosse around the Round Tower, and that making it an ACA would help 'retain the essence of the urban structure within the village core'.	CE Response: The submission is noted. CBH2 Objective 1: <i>To retain the essence of the urban structure within the village core which is integral to its heritage, historic and tourism value, ensuring that new development respects the proportions and scale of the existing urban structure and modest vernacular building designs.</i>

		The roadway and paths on either side of Orchard Road are not within the Village ACA. However, the fosse is identified in Figure 7.16 as a limestone wall of architectural and historic interest with related objectives for its preservation. In particular CBH5 Objective 8 relates and states: To require any proposed development along Orchard Road which may impact on any existing walls within or enclosing the properties fronting the road to be accompanied by a report from a suitably qualified person indicating the location of any upstanding masonry within existing walls which may contain remnants of the old monastic boundary of Clondalkin (fosse) Recorded Monument DUO17-041001. Any identified remains shall be recorded and protected in accordance with best conservation practice. As indicated in the objective, the old monastic boundary of Clondalkin (fosse) is a Recorded Monument and it is considered that this provides the necessary statutory protection alongside the policy in the LPF. It is also identified as being within a Zone of Archaeological Protection, shown in the County Development Plan maps, meaning that any planning applications in the area are referred to the Development Applications Unit in the DHLGH. CE Recommendation: No change to Draft LPF.
--	--	--

SD-C367-138 Paul Gogarty TD	Architectural Conservation Areas A submission welcomes the ACA appraisal and the efforts to protect Clondalkin's heritage. During the implementation stage, input from historical and conservation groups may be required. One submission refers to CBH2 Architectural Conservation Area Objectives 1-5. It is requested that the 'full ACA be listed, and the extended ACA be clearly identified and stated'. The submission asks if this is a satellite ACA as stated in County Development plan meetings. One submission asks whether the council will create Satellite Architectural Conservation Areas (ACAs) around other key local heritage sites including: - Fairview Oil Mills, - St Cuthbert's Church and moat, - Mount St Joseph graveyard, and - St Brigid's Well. - the heritage 2-storey houses on Cloverhill Road from the 9th Lock Road junction as far as Crag Avenue These were previously suggested by SDCC's previous Director of Planning during County Development Plan consultations. 'Conservation of built heritage' can	CE Response: The welcoming of the ACA appraisals and the efforts to protect Clondalkin's heritage is noted. All planning applications are assessed by the Development Management team, including input from the Architectural Conservation Officer and the Development Applications Unit of the DHLGH where appropriate. Submissions are also welcome from historical and conservation groups to inform the planning application process. The five objectives listed under CBH2: Architectural Conservation Areas in section 7.4 of the LPF provide direction on the way in which development should generally be considered within the ACAs in Clondalkin. The list of ACAs is contained earlier in Chapter 7, in Section 7.1 Introduction and in Section 7.2 Policy Context as follows: <i>The CDP has designated two Architectural Conservation Areas (ACAs) within the LPF boundary namely, Clondalkin Village ACA, and St. Brigid's Cottages ACA, with a third, Ninth Lock and Ballymanaggin Lane ACA positioned to the north of the village, adjacent to the Ninth Lock of the Grand Canal and outside of the LPF boundary (see Figure 7.6).</i> The introduction includes images of the three ACA Character Appraisals carried out as part of the preparation of the LPF and which will help inform owners and planners alike as to what type of development is appropriate within
-----------------------------	--	---

	support ‘employment, economic development, and tourism’. One submission requests that an objective be added to include Fairview Oilmills to the ACA. Another submission requests in relation to CBH2 Architectural Conservation Area (ACA) Objectives 1-5, St Cuthbert's Church, Moat and Graveyard be added to the ACA. A submission requests that the ACA boundary Figure 7.6 be corrected to include Clondalkin Library.	each ACA and what would need to come in for planning permission. Notwithstanding the above, it is recognised that it would be helpful if the names of the ACAs could be repeated in CBH2 Objective 4 so that it would read as follows: <i>To promote awareness and understanding of Clondalkin Village ACA, St. Brigid's Cottages ACA and Ninth Lock and Ballymanaggin Lane ACA through the inclusion promotion of the ACA Character Appraisals on SDCC's website and through wider direct engagement with business owners and residents within the ACAs.</i> The ACAs were adopted in the County Development Plan and the LPF has not made any changes to their extent. As part of the CDP review, the possibility of the existing Village ACA being extended to include some sites that sit as stand-alone, outside the existing area was assessed and it was considered at that time, that to spread the ACA over a wider area the cohesion, richness and architectural character of the area starts to lose the essence of a very defined and core historic area. An ACA is described as ‘<i>An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape, taking account of building lines and heights, that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or that contributes to the appreciation of a protected structure, and whose character it is an objective of a development plan to</i>
--	---	---

		<i>preserve</i>’ [Section 81, 2000 Act]. Criteria for assessment of ACAs is set out within the Architectural Heritage Protection Guidelines for Planning Authorities. The Guidelines indicate in section 3.1.1: <i>‘A planning authority recognises, by making provision in the development plan for the protection of these areas, that in many cases, the protection of the architectural heritage is best achieved by controlling and guiding change on a wider scale than the individual structure, in order to retain the overall architectural or historic character of an area.’</i> Fairview Oil Mills and St. Cuthbert’s Church and Moat are outside the existing ACAs and as standalone structures would not meet the criteria for being within an ACA. They are also outside the LPF boundary and therefore cannot be considered as part of this process. However, the County Development Plan already contains an objective relating to Fairview Oil Mills as follows: NCBH16 Objective 5: <i>To preserve and develop the Fairview Oil Mills at Cherrywood Crescent in Clondalkin as the remains of the mill are a good example of functional industrial architecture and are an important reminder of the industrial heritage of the Clondalkin area.</i> Fairview Mill is on the Record of Protected Structure (RPS) listed in Appendix 3A of the County Development Plan, RPS reference 165. It is also listed on the Record of Monuments and Places (RMP) as DU021-008. As such, notwithstanding that it is outside the boundary of the LPF and this current
--	--	---

		process, it is considered that it has significant statutory protection being on both the RPS and the RMP. Similarly, the Church and Moat in Kilmahuddrick known as St. Cuthbert's is outside the LPF boundary. However, it is on the Record of Monument and Places, identified as references DU017-038001 to 03 and has statutory protection under the relevant legislation. It is also recorded 133 in the RPS. The heritage 2-storey houses on Cloverhill Road are also outside the existing ACAs and as standalone structures would not meet the criteria for being within an ACA. They are also outside the LPF boundary and therefore cannot be considered as part of this process. St. Brigid's Well is within the LPF but is not within an ACA. It is recorded on the Record of Protected Structures and has, therefore, statutory protection under the relevant legislation. It is also on the RMP. As a stand-alone structure it being on both the RPS and RMP is the most appropriate conservation protection. Mount St. Joseph's Graveyard on Monastery Road is also on the Record of Protected Structures as identified in Appendix 3A of the County Development Plan reference 427. As outlined in the response to a question on satellite ACAs at the May Council meeting in 2024, the concept of 'satellite' ACAs does not exist. Each ACA exists in its own
--	--	---

		right, and the policy and objectives outlined in the County Development Plan apply to each equally. It is considered that the structures identified in the submission have significant statutory protection and their inclusion in a new ACA would not meet the criteria for being in an ACA and would therefore neither be necessary nor an appropriate mechanism for their protection. Clondalkin Library is not within the adopted Village ACA boundary. Figure 7.6 on page 70 is correct. CE Recommendation: Amend CBH2 Objective 4 to include the names of the three ACAs in Clondalkin as follows, from: <i>To promote awareness and understanding of ACAs through the inclusion of the ACA Character Appraisals on SDCC's website and through wider direct engagement with business owners and residents within the ACAs.</i> To <i>To promote awareness and understanding of Clondalkin Village ACA, St. Brigid's Cottages ACA and Ninth Lock and Ballymanaggin Lane ACA through the inclusion promotion of the ACA Character Appraisals on SDCC's website and through wider direct engagement with business owners and residents within the ACAs.</i>
--	--	--

SD-C367-95 The Heritage Council	Architectural Conservation Areas The submission states that this chapter is of an excellent standard. The inclusion of character appraisals for each of the Architectural Conservation Areas is recognised as essential to assessing development impacts within ACA's. The submission indicates that the policies and objectives are well-substantiated and that many of the proactive objectives for re-use of heritage buildings are important. Vacancy and dereliction in Irish towns, villages and cities is concerning and to encourage the adaptive reuse of historic buildings and protect the buildings fabric, a hospitable planning approach is required. While this may be implied by county development plan policies, the submission recommends: -A new objective under CBH2: Architectural Conservation Areas: <i>Objective X – Departures from development management standards will be considered for proposals that demonstrate good compliance in terms of design quality and have shown high regard to the ACA Character Appraisal.</i> -Amend (in bold) CBH3 Objective 1: <i>Objective X – To encourage adaptive reuse of buildings, including but not limited to protected</i>	CE Response: The content of this submission is noted and welcomed. While the purpose behind the new objective and the proposed amendment to CBH3 Objective 1 is understood, it considered that the existing CBH3 Objective 1 is sufficient to provide justification within an assessment on a planning application to apply a degree of flexibility where this is considered to be appropriate. The scope of the objective is broad, covering all adaptive re-use of vacant buildings in general, on that basis, care would have to be taken in an assessment on a planning application that standards which can be achieved are being achieved. The CDP already provides for some flexibility when it comes to adaptive reuse of protected structures. There is also policy and objectives within the CDP to retain existing buildings which are considered to contribute to historic character, local character etc. where they are not protected structures. Furthermore, existing section 28 guidelines also provide for certain flexibility in development management standards. For instance, the new Apartment Guidelines (July 2025) include Specific Planning Policy Requirement 3 which states: <i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum</i>
--	---	---

	structures and historic buildings of interest, to bring the buildings back to life, avoid vacancy and contribute to the vibrancy of Clondalkin. Departures from development management standards will be considered, for proposals that positively seek adaptive re-use of buildings.	outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects. And SPPR 4 of those guidelines states: <i>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</i> Having regard to the existing provisions in the LPF, the County Development Plan and the relevant government guidelines, it is considered that the proposed amendments are adequately catered for in existing policy on a case-by-case basis and to include the amendments could create a situation where standards which are achievable in certain instances cannot be brought forward. CE Recommendation: No change to Draft LPF.
SD-C367-20 Eastern and Midland Regional Assembly	Architectural Conservation Areas The submission supports policies and objectives set out in the Draft LPF to safeguard the architectural and archaeological heritage. This aligns with RPO 9.30 and Section 9.7 of the RSES. The submission welcomes the inclusion of CBH2 Objective 1, CBH2 Objective 2 and CBH2 Objective 5 in the LPF which helps to manage the integration of	CE Response: The content of the submission is noted. CE Recommendation: No change to Draft LPF.

	the new development within the ACA. This aligns with the broader objectives of the Regional Strategic Outcomes (RSO) of the RSES, particularly RSO 5 which seeks to enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration.	
--	--	--

Protected Structures and Structures of Architectural Heritage Interest		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Protected Structures and Structures of Architectural Heritage Interest The submission supports the recognition of the local history and heritage in the plan and states that heritage structures and new developments can co-exist with one another, thereby benefiting all. This submission includes a number of points and queries on the following structures and potential uses / reuses for some of them, indicating that they are wholly owned and / or controlled by SDCC and seem to have been omitted from this version of the LPF – – Fairview Oil Mills, could be adapted for tourism and recreational purposes – St. Cuthbert’s Church, Moat and Graveyard, approximately as old and important as the Round Tower, could be adapted for tourism and educational purposes	CE Response: It is noted that of the structures identified within the submission, three are within the LPF boundary. These are Mount St. Joseph’s Graveyard, Knockmeenagh Lane (Slí Mór) and the disused swimming pool within Clondalkin Park. Fairview Oil Mills and St. Cuthbert’s Church, Moat and Graveyard lie outside the LPF boundary and as such are out of scope for this Variation process. See section on Miscellaneous / Out of Scope for further response. In relation to the structures within the LPF and therefore within the scope of this Variation process the following is noted: Disused Swimming Pool - The Community Department advises that while no works have been completed on the disused swimming pool project to date the Council is considering what options might be available. The first stage

	– Mount St. Joseph’s Graveyard – Slí Mhór (Knockmeenagh Lane) – The disused swimming pool building in Clondalkin Park. It is indicated that this building is known locally as the “Community Building”, was originally funded by local people and that SDCC has owned the building for many years without re-using it. It is suggested that this building could be used for local community groups. It is also asked if SDCC will work to reclaim disused swimming pool building in Clondalkin Park, Fairview Oil Mills and St. Cuthbert’s Church, Moat and Graveyard, to prevent further damage to their fabric, make them available for public use at an affordable cost to the people who wish to use them.	of the process will be to complete an assessment of the condition of the old pool and to outline options/costing for what may be possible. The Council will look to have this assessment commissioned when a resource can be made available to action it. This is currently dependent upon the completion of other capital projects that have already been committed to within the Council Capital programme. Any decisions on the future use of the building will be made in conjunction with the development of the Civic Offices. The LPF supports the adaptive reuse of vacant buildings, for example CBH3 Objectives 1 states: <i>‘To encourage adaptive reuse of buildings, including but not limited to protected structures and historic buildings of interest, to bring the buildings back to life, avoid vacancy and contribute to the vibrancy of Clondalkin.’</i> Knockmeenagh Lane (Slí Mór) – There are a number of objectives in the LPF concerning Knockmeenagh Lane. Chapter 7 includes Knockmeenagh Lane in Figures 7.11 and 7.12 outlining that it may be part of the ancient Slí Mór and is still considered an important Pilgrim Route today, this chapter also refers to its importance as a connecting route which is further set out in Chapters 5 and 8. Figure 7.14 shows an example of a rubble limestone wall on Knockmeenagh Road with associated objectives to protect same. Chapter 5 includes design parameters for the wider Knockmeenagh Framework Area but clearly recognises the
--	---	--

		historic integrity of the Lane and associated Slí Mór. KF3 Objective 1 states: <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 connections to and from the framework site to the Lane and further northwards.</i> An indicative layout of how this might be achieved as part of future development to the south of the Lane is shown in Figure 8.36. This would protect the integrity of the Lane while promoting the economic and tourist heritage of the pathway through the achievement of an improved environment for visitors and local people alike. Mount St. Joseph's Graveyard – This graveyard is within the old Carmelite College on Monastery Road at Monastery Heath. It is recognised that a group of local people are involved in maintenance around the graveyard. The Council is recently providing some assistance in this. Mount St. Joseph's Graveyard is on the Record of Protected Structure (RPS) listed in Appendix 3A of the County Development Plan, RPS reference 427. The protected status of the site affords it statutory protection. CE Recommendation: No change to Draft LPF.
--	--	--

SD-C367-159 Monica McGill	Protected Structures and Structures of Architectural Heritage Interest The submission proposes that the council, in coordination with relevant authorities, restrict access to Tower Road for buses and Heavy Goods Vehicles, allowing only occasional necessary access to private properties in the interest of protecting the round tower. It highlights the narrow width of the footpath (175 cm) at the Round Tower.	CE Response: The Office of Public Works (OPW) are the designated managers of the Round Tower monument. The OPW have monitors on the structure which constantly monitor vibrations or structural movements. In recent times, the OPW have not been in contact with the council to request any traffic study, any change in allowable traffic classifications on the road or any further protection works at the Tower. It is not the Councils place to interfere in the management of this structure. If the OPW asked the council to undertake any traffic changes or additional traffic protections, the council would certainly comply with any instructions fully. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	Protected Structures The submission queries the councils plans for the Old RIC Barracks, is there an intention to purchase the building. If it purchased, can the premises be made available to community groups and individuals at a minimal rental cost.	CE Response: The Development Plan includes an objective (NCBH20 SLO 1) which seeks '<i>To investigate the purchase and development of the Old RIC Barracks on the Old Nangor Road which is a Protected Structure within the present Architectural Conservation Area (ACA).</i>' The RIC Barracks is addressed in Section 8.5.3 as an Opportunity Site – Adaptive

		Reuse of the Old RIC Barracks on page 94 of the LPF and states: ‘The re-use of the building as residential could be considered. Similarly, consideration could be given to the adaptive reuse of the building for non-residential uses such as community/ art/ afterschool or combined with potential heritage building use. Commercial uses aligning with heritage status of the building such as art studio’s, architectural or related businesses might also be considered. Such uses would provide the opportunity for the enclosed front garden to become a new, publicly accessible open space in the historic core of Clondalkin supporting and complementing the Round Tower site. There is also potential for the interior to be adapted to provide open plan spaces and functionality using contemporary design. Potential for re-development of this site in conjunction with adjoining site to the rear should the opportunity arise should also be considered.’ The council has previously made enquiries about purchasing the RIC Barracks when it was for sale, they were unsuccessful in being able to purchase the building. The Economic Development department has advised that the Council is currently focusing on investing and supporting the development of the Round Tower Visitor Centre, as well as upgrading Clondalkin Library as part of the implementation of its Tourism and Libraries strategies. CE Recommendation:
--	--	--

		No change to Draft LPF.
SD-C367-159 Monica McGill	Structures of Architectural Interest The submission asks the council to consider purchasing the two remaining heritage cottages along with the stone building behind them on Main Street, for community use. This would help ensure their protection from future unsympathetic development.	CE Response: The economic development department notes that the Council is not currently seeking to acquire any properties in the Clondalkin area for community and cultural use, with instead a focus on investing and supporting the development of the Round Tower Visitor Centre, as well as upgrading Clondalkin Library as part of the implementation of its Tourism and Libraries strategies. However, in terms of community uses in general, there is an objective for the provision of a multi-use building on the Ninth Lock Framework site as part of any large scale development on that site. Where a reuse is being sought for these cottages a planning application assessment will be guided by the objectives in the LPF including those for adaptive reuse and the protection of the heritage of Clondalkin. CE Recommendation: No change to Draft LPF.

New Development		
Submission No.	Submission Summary	CE response and recommendation

SD-C367-53 Cllr Francis Timmons	New Development The submission requests amendment to CBH4 New Developments Objs 1-6 - That a height restriction is made around the Village Core and in Particular the ACA and that all development in the Village Core is in keeping with the Historical value of our Historic Town.	CE Response: Objectives addressing height within the ACA have been included and are considered appropriate. For example, CBH4 Objective 2 seeks <i>‘To support the development of sustainable back land and infill development that responds to the historic pattern of development including its varied street character, building alignment, heights and roof forms, ensuring development transitions appropriately and accommodates surviving structures to the greatest extent possible.’</i> Furthermore, the LPF contains strategic urban design objectives that relate to height including to <i>‘Ensure that new development strengthens the urban fabric through high-quality, well-designed development and interventions which respond to the urban form, urban grain, and layout in the context of Clondalkin and ensure that the approach to building height, materials and finishes are appropriate to this context’</i> and to <i>‘Support higher density redevelopment of brownfield, derelict and infill sites, where appropriate to context, to include mixed-uses for retail, services, tourism, community, and employment creation.’</i> The determination of appropriate heights will be carried out as part of the Development Management assessment process and will be guided by SDCC <i>‘Building Height and Density Guide 2022’</i>, adopted as part of the South Dublin County Development Plan 2022-2028. CE Recommendation:
--	---	--

		No change to Draft LPF.
--	--	-------------------------

Historic – Walls and Boundaries		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-53 Cllr Francis Timmons SD-C367-159 Monica McGill SD-C367-53 Cllr Francis Timmons	Historic Walls One submission requests that all the walls should be listed so it is clear what walls are protected. This could be in an appendix at the back of the Framework document, and the Old Naas Road wall should be included in the list. One submission requests that all protected walls be listed including the Old Naas Road wall. In relation to CBH5 Objective 3, another submission asks whether the council will conduct research and produce a report on the heritage walls. This research should include: - The historic limestone wall on the Old Naas Road near the Green Isle Hotel. - The legacy wall of the original walled garden of Floraville House.	CE Response: Historic Walls A survey of historic walls was carried out as part of the preparatory work for the LPF. The survey is reflected in the maps contained with the LPF. Figure 7.16 on page 75 (SDCC Clondalkin LPF Ch7.pdf) shows the ‘Limestone walls of architectural and historic interest identified in the study area which positively contribute to the architectural character of the area’. Figure 8.10 on page 91 (SDCC Clondalkin LPF Ch8.pdf) goes into greater detail on the walls within the village and environs, showing their location and providing associated descriptions and images. These maps clearly show the locations of the identified historic walls. In some instances, issues around ownership, laterally extending walls and access meant that the carrying out of a survey of this type was not possible. However, this issue has

	- A full list of the walls involved, location mapped, and colour photographs of the walls' current condition. - The report be published to allow local input, noting that conservation architects Molloy Associates have identified Clondalkin's heritage walls as a significant feature of the area. Historic Gates, Entrances and Piers One submission requests an amendment to CBH5 Objective 1 to state that the Historic Gates, Entrances and Piers are listed in an Appendix. This will add clarity for future reference.	been addressed in the LPF through the inclusion of comprehensive objectives for the protection of walls including identified walls, walls where it is not clear whether or not they are historic, set back protection, finishes, materials and maintenance including: CBH5 Objective 2: <i>To require new boundary treatments or reconstruction of boundaries to reflect where appropriate, the composition and materials of traditional boundary / entrance treatments</i> CBH5 Objective 3: <i>To protect and preserve the identified historic limestone walls of Clondalkin whether located within or outside of designated ACA areas (Figure 7.16 - Historic Walls) and ensure that any future development proposals will have due regard for the historic nature and importance of these walls.</i> CBH5 Objective 4: <i>To ensure that where development is proposed which includes a boundary or other wall, and where it is not known whether this wall is historic (Figure 7.16 - Historic Walls), that an examination, including a report, of the wall is undertaken by a qualified professional prior to any proposal for development. Where the wall is identified in this way as historic it shall be protected and designed in to any development proposal.</i> CBH5 Objective 5: <i>To ensure that sufficient set back is provided where development is proposed adjacent to historic walls, recognising that their foundations may be minimal and / or they may be vulnerable to development.</i>
--	--	--

		CBH5 Objective 6: <i>To maintain historic walls in accordance with best practice, repairs should be undertaken by a competent craftsperson using traditional methods and materials, where possible. If this is not possible a clear rationale should be set out as to why, alongside the proposed alternative solution. The proposed methodology for repair shall be submitted to the planning authority for agreement prior to the repairs or ground works / development being carried out.</i> CBH5 Objective 7: <i>To encourage new boundary walls to be low walls finished with roughcast render with solid limestone cappings, as generally preferable to the application of limestone cladding or veneers.</i> CBH5 Objective 8: <i>To require any proposed development along Orchard Road which may impact on any existing walls within or enclosing the properties fronting the road to be accompanied by a report from a suitably qualified person indicating the location of any upstanding masonry within existing walls which may contain remnants of the old monastic boundary of Clondalkin (fosse) Recorded Monument DUO17-041001. Any identified remains shall be recorded and protected in accordance with best conservation practice.</i> VF 4: <i>To protect and preserve the identified historic limestone walls of Clondalkin whether located within or outside of designated ACA areas (see Figure 8.10 - Historic Walls identified in Clondalkin Village and environs) and</i>
--	--	---

		<i>ensure that any future development proposals will have due regard for the historic nature and importance of these walls.</i> The Old Naas Road wall is outside the LPF area and out of scope to be addressed in this plan. However, it is noted that the County Development Plan includes a specific local objective (SLO) which is copied in to section 7.2 Policy Context of the LPF as follows: NCBH21 SLO 1: <i>To protect and maintain the remaining old stone walls of Clondalkin</i> Historic Gates, Entrances and Piers CBH5 Objective 1 states: <i>To ensure protection of historic gate piers, gates and entrances, safeguarding these important features so that they continue to enrich the quality of the public realm.</i> This is further supported by objectives dealing with structures of architectural heritage interest including: CBH3 Objective 3: <i>To strongly encourage the retention of existing buildings and original features that, while not listed as Protected Structures, are considered to contribute to the local and historic character, visual setting, or streetscape value within Clondalkin. Any proposal to the contrary shall clearly demonstrate to the satisfaction of the Planning Authority why its retention cannot be achieved.</i> And
--	--	---

		CBH3 Objective 4: <i>To encourage owners of protected structures and structures of architectural heritage interest located in Architectural Conservation Areas to carry out appropriate conservation and alteration of their property to ensure their continued contribution to historic townscape character facilitating the uptake of funding opportunities insofar as possible.</i> Given the extensive policy provision in the LPF for historic walls, alongside their identification in two maps, and the objectives relating to historic gates, entrances and piers it is considered that no further appendices are necessary. However, an amendment to CBH5 Objective 3 is recommended to make clear that there are two maps relating to the identified walls. CE Recommendation: Amend CBH5 Objective 3: from <i>‘To protect and preserve the identified historic limestone walls of Clondalkin whether located within or outside of designated ACA areas (Figure 7.16 - Historic Walls) and ensure that any future development proposals will have due regard for the historic nature and importance of these walls.’</i> To the following wording <i>‘To protect and preserve the identified historic limestone walls of Clondalkin whether located within or outside of</i>
--	--	---

		<i>designated ACA areas (Figure 7.16 and Figure 8.10 - Historic Walls) and ensure that any future development proposals will have due regard for the historic nature and importance of these walls.'</i>
--	--	--

Visual and Urban Clutter		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-53 Cllr Francis Timmons	Visual and Urban Clutter Two submissions raise concern about shop frontages within the village.	CE Response: The contents of the submissions are noted.
SD-C367-188 Paul McKiernan	Two submissions request the LPF to state that electric signage is not permissible within the ACA in the interest of preserving the historic character of the area.	In regard to concerns about shop frontages and signage the LPF, Conservation Plan and the ACA documents contain information and objectives that promote good shop front design and appropriate signage that is mindful of Clondalkin's heritage.
SD-C367-159 Monica McGill	One submission reference's part 3 of the conservation plan and states that given that Clondalkin is a historical village, commercial frontage needs to be maintained appropriately.	The LPF contains objectives within CBH8 which relate to visual and urban clutter. For example, with respect to signage, CBH8 Objective 2 states:
SD-C367-53 Cllr Francis Timmons	Another submission requests the inclusion of the following objective 'to require that every shopkeeper/shop manager who wishes to put any visual/urban clutter (either permanent or temporary)	<i>'To ensure that signage, street furniture, and road markings, particularly within and in close proximity to designated ACAs, are simple and visually restrained in design promoting a holistic approach to quality street surfaces, reflecting the</i>

	outside or hanging from their shop must apply for planning permission.' This should be clear in the LPF so enforcement can occur when not followed. Relating to CBH2 Objective 4, one submission queries will the council inform business owners that their premises are located within the Clondalkin Architectural Conservation Area, to raise awareness of its heritage value. The submission asks will the council promote stronger grants for shopfront refurbishment, in the interest of aligning with the ACA.	<i>high quality public realm at Brú Chrónáin Visitor Centre insofar as is feasible.'</i> Regarding shop fronts, CBH8 Objective 4 states: <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.'</i> Objective 6c in the conservation plan also relates to shopfronts. Relating to the suggested objective, the provisions of the legislation de-exempt a range of activities within ACA's. Section 82(1) Planning and Development Act 'Development in architectural conservation areas' states: '(1) Notwithstanding paragraph (a), (h), (i), (ia), (j), (k) or (l) of section 4(1), or any regulations made under section 4(2), the carrying out of works to the exterior of a structure located in an architectural conservation area shall be exempted development only if those works would not materially affect the character of the area. Works generally exempt but will require planning permission in an ACA Area if It materially affects the character of the area.' This is set out in each ACA within the 'Development Management' section. In the context of these provisions of the legislation it is unnecessary and outside of the remit of a variation to a CDP to include the suggested objective. In addition, it is noted that the LPF contains the following objectives in relation to visual and urban clutter:
--	---	---

		CBH8 Objective 1: <i>‘To reduce visual clutter created by, but not exclusively, traffic management structures including bollards, utility structures and signage and strengthen wayfinding connections between historic elements of the town.’</i> CBH8 Objective 2: <i>‘To ensure that signage, street furniture, and road markings, particularly within and in close proximity to designated ACAs, are simple and visually restrained in design promoting a holistic approach to quality street surfaces, reflecting the high quality public realm at Brú Chrónáin Visitor Centre insofar as is feasible.,</i> VF 3: - <i>Reduce visual clutter from signage, street furniture and road markings across the village including the ACA.</i> - <i>Ensure consideration at the early stage of development to be given to location and appearance of services where they interact with public realm.</i> - <i>Work to improve the appearance of shop fronts and promote SDCC’s Shop Front Grant Scheme and Shop Front Design Guide to enhance visual cohesion in the village.</i> Relating to the council informing business owners, the council’s website includes information on ACAs and required policy and objectives and provides information on grant funding for architectural conservation repairs/works to buildings within ACAs. As part of the CDP all ACAs are listed
--	--	--

		within the written statement and are indicated on the maps to show the defined area. Related policies are also included relating to ACAs in relation to planning control and guidance in particular relating to shopfronts etc. Once the LPF is adopted all provisions of the LPF and the supporting documents will be available to the public and will assist and advise those wishing to make planning applications of the planning requirements. The Council continues to facilitate National Architectural Conservation Grants under the BHIS and HSF, which are funded by the Dept. Under the BHIS there is a stream of funding which includes original shopfronts and would qualify under the type of work which would be grant funded. Owners/occupiers can apply under BHIS for buildings within ACAs. Details are announced annually by the Minister. It is considered that the provisions within the draft LPF are sufficiently robust to facilitate the concerns raised. CE Recommendation: No change to Draft LPF.
--	--	---

General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	General	CE Response:

SD-C367-159 Monica McGill	One submission recommends a fresh walkabout in the area to identify trees, rows of trees, or strands of trees that would be worthy of TPO status. Another submission requests that SDCC take a more informative and proactive approach to imposing Tree Protection Orders to protect trees and hedgerows and contribute to improving air quality and biodiversity. For example, a part of the natural hedgerow and supporting bank along the Slí Mhór was removed by a landowner, who may not have owned it.	There is currently one TPO within the LPF area at St. Brigid's, New Road (now Newlands Garden Centre). Chapter 4, Green Infrastructure, Chapter 7, Conservation and Built Heritage and Chapter 8, Urban Design Strategy of the LPF all include objectives which recognise and support the important role that trees have in both the greening and urban landscape of the village. These objectives include the need to retain trees and to plant new trees where feasible as part of the VES and other works. The County Development Plan, of which the LPF will become a part should it be adopted, already includes policy and objectives around TPOs. Policy NCBH11 states: <i>'Review Tree Preservation Orders (TPO) within the County and maintain the conservation value of trees and groups of trees that are the subject of a Tree Preservation Order while also recognising the value of and protecting trees and hedgerows which are not subject to a TPO.'</i> As such, while the intent of the submissions are acknowledged, there is existing policy already contained in the CDP to support the intent of the submissions. CE Recommendation: No change to Draft LPF.
SD-C367-158 Christopher Conway	General The submission agrees with the Heritage Council submission regarding chapter 1 (sic).	CE Response: The submission is noted. The Tourism section of the Council advises that it will explore any additions to the visitor

	The Clondalkin Round Tower and the Visitor Centre are excellent cultural features for the area but the information plaque display is not suitable and needs a plaque that is readable and at eye level. The Reginald Tower in Waterford is a good example that could be replicated in Clondalkin.	experience of the Round Tower Visitor Centre as part of any future upgrades to the facility. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	General The submission proposes that the council provides a source of clean drinking water at St Brigid's Well to enhance the visitor experience, particularly during the annual St Brigid's Festival. This would honour the site's ancient pre-Christian past when the well provided clean, drinkable water.	CE Response: The LPF includes strong policy on sustainable urban drainage systems (SuDS) which provides for an ecosystems approach to managing surface water. SuDS forms an important pillar in managing the quality of runoff to prevent pollution and improves the water quality of surface water downstream of the infrastructure, including rivers/streams they discharge to. The LPF will continue to promote the use of the 'South Dublin Sustainable Drainage Explanatory Design and Evaluation Guide' (2022) to promote the use of SuDS solutions within the LPF area. In addition, the LPF contains a number of objectives relating to SuDS including: CA8 Objective 3: <i>Promote the retrofitting of SuDS on private and public lands, such retrofitting could include permeable paving on driveways, installation of rainwater harvesting systems and the provision of vegetated systems such as swales and bioretention areas within private gardens or public areas.</i> GI1 Objective 4: <i>Require the provision of Sustainable Drainage Systems (SuDS) in all new developments in</i>

		<i>Clondalkin to maximise biodiversity, amenity, and climate mitigation benefits from the use of these systems.</i> <i>GI8 Objective 1: Facilitate SuDS and nature-based solutions within the public realm and streetscape, ensuring it integrated to the greatest extent possible alongside the required transport network.</i> <i>VF 2: Ensure that all proposed development incorporates SuDS in accordance with the SDCC SuDS Guidance.</i> <i>VES1 Objective 3: To support better placemaking through measures to improve the animation of the Ninth Lock Road through increased soft landscaping, including nature-based SuDS features and trees where feasible, and providing additional crossing points and active frontages.</i> The implementation of SuDS infrastructure will therefore benefit water quality in the area within which St. Brigid's Well is located. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	General The submissions asks the council to clarify the meaning of 'Ninth Lock' on Page 70 in the context of the sentence 'The CDP has designated two Architectural Conservation Areas (ACAs) within the LPF boundary namely, Clondalkin Village ACA, and St. Brigid's Cottages ACA, with a third, Ninth Lock and	CE Response: The official name of the Architectural Conservation Area 017 mapped on this page is 'Ninth Lock and Ballymanaggin Lane ACA'. It is noted that this ACA is located outside of the LPF area. CE Recommendation:

	Ballymanaggin Lane ACA positioned to the north of the village, adjacent to the Ninth Lock of the Grand Canal and outside of the LPF boundary’.	No change to Draft LPF.
SD-C367-159 Monica McGill	General The submission requests that the council conduct stronger monitoring of developments during construction to prevent damage to adjacent built heritage. It calls for the council to strengthen its enforcement and impose prohibitive penalties for violations. Prohibitive penalties can include the removal of an offending structure entirely or partly. It also requests that any damage to heritage structures caused by developers be restored at the developer’s expense. Developers in the past have non-complied and this has led to heritage loss.	CE Response: The monitoring of development during construction is carried out under the Building Control Regulations. SDCC is currently meeting its targets in relation to monitoring. Planning enforcement has set procedures under the Planning Acts and this is carried out on a case-by-case basis. Penalties are a matter for the courts as part of the process, where appropriate. The LPF sets policy objectives and enforcement is outside the remit of the plan. However, as part of the planning application process the Council’s Architectural Conservation Officer would usually request a safety statement be provided detailing how the protected structure’s original fabric and architectural features will be protected during development. This has generally proven successful by way of being a condition requiring compliance where the Council’s Architectural Conservation Officer carries out an inspection of safety measures put in place before approving the compliance of the condition on the planning application. CE Recommendation:

		No change to Draft LPF.
SD-C367-159 Monica McGill	General The submission queries whether the council will consider the Vision Document for Clondalkin Local Area, 2022 which was compiled by local community groups and supported by local TDs and councillors. This document outlines the potential of heritage assets to contribute to tourism, education, employment, and economic development in the area and calls for their preservation/conservation/refurbishment.	CE Response: The Vision for the LPF is set out in Chapter 2 as follows: <i>That Clondalkin grows as a vibrant, sustainable community rooted in its unique history and heritage, where people of all ages and backgrounds can enjoy a rich mix of culture, social connections, and economic opportunities. With new green areas and easy-to-use transport options, everyday life will be improved, making it safer and more enjoyable for everyone as a place where people will love to live, work, visit, and invest in the future.</i> The chapter outlines how the vision was developed, having regard to the various feedback from the pre-draft public consultations and from analysis in the form of the Strengths, Weaknesses, Opportunities and Challenges undertaken as part of the process. Chapter 2 has also expanded on the Vision through the identification of eight strategic objectives which underpin the Plan as a framework for development including one which recognises the cultural, historic and economic value of the heritage assets of Clondalkin. These strategic objectives are supported by the more detailed objectives in the different chapters of the Plan.

		It is considered that the vision in the LPF has incorporated at an appropriate level the various issues raised in the document referenced in the submission. CE Recommendation: No change to Draft LPF.
--	--	---

Miscellaneous / Out of Scope		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Miscellaneous / Out of Scope The submission raises the following queries in relation to full-time Archivist and staff: - Will the council positively view the employment of a full-time Archivist and supporting staff? - When will the council employ a fully-qualified, Archivist and staff dedicated to recording and archiving the various materials, information and sites of historical value? - When will SDCC employ staff dedicated to engaging knowledgeably with members of the public when they request historic, heritage, or genealogical information?	CE Response: The Heritage Council is currently supporting Local Authorities across the country to recruit for a range of heritage professionals, including Archivists. SDCC's County Library is currently availing of this support and has commenced a recruitment process to fill an Archivist's post. These matters are not directly relevant to the LPF. CE Recommendation: No change to Draft LPF.

SD-C367-159 Monica McGill	Miscellaneous / Out of Scope The submission queries whether the council will liaise with the authority in charge of the Grand Canal and its banks regarding their protection, condition and leisure uses both presently and in the future.	CE Response: This is outside the remit of the LPF. Responsibility for the Grand Canal waterway lies with Inland Waterways. The Council will continue to engage with Irish Waterways as appropriate. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	Miscellaneous / Out of Scope The submission queries will South Dublin County Council liaise with Dublin City Council in relation to the City Edge Development to protect the historic nature of the area. It also queries whether heritage experts examine the City Edge Development before development begins, to ascertain if there are any historical assets or routes present, such as the Slí Mhór.	CE Response: While the City Edge Area adjoins the Clondalkin LPF area, it is not within the LPF boundary and not within the remit of the plan. The future development of this area is subject to a separate statutory public consultation process. Queries regarding the detail of that project need to be addressed directly to the City Edge Team. The Clondalkin LPF has no remit in this regard. In relation to liaison with Dublin City it is noted that the City Edge Project is being carried out jointly by SDCC and Dublin City Council. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	Miscellaneous / Out of Scope This submission includes a number of points and queries on the following structures and potential uses / reuses for some of them, indicating that they are	CE Response: Fairview Oil Mills and St. Cuthbert's Church, Moat and Graveyard lie outside the LPF boundary and as such are out of scope for this Variation process.

	wholly owned and / or controlled by SDCC and seem to have been omitted from this version of the LPF – – Fairview Oil Mills, could be adapted for tourism and recreational purposes – St. Cuthbert’s Church, Moat and Graveyard, approximately as old and important as the Round Tower, could be adapted for tourism and educational purposes The submission also asks whether SDCC will abide by CBH2 Objective 3 ‘demolition of a structure’ for Fairview Oil Mills and St. Cuthbert’s Church, Moat and Graveyard but not limited to them. It also asks if these structures will be considered in a positive light for adaptive use, noting CBH3 Objective 1 ‘to encourage adaptive reuse of buildings’ The submission also includes queries around the timing and completion of an archaeological study / excavation at St. Cuthbert’s Church, Moat and Graveyard including when the study will be available to the public and whether any proposals will be sympathetic to the heritage character and importance of the site.	By way of information, there are major park upgrade works currently ongoing in St Cuthberts Park, the final part of which involves clearance of vegetation from around St Cuthberts Church and Moat. This will be happening in November 2025. Currently the church and graveyard are heavily overgrown making visibility and understanding of the historic features difficult. Some disturbance of the site has occurred over time from mature vegetation, rubbish, antisocial behaviour and vandalism making the church unsafe to visit. Vegetation clearance at the church and Moat will make the site more visible and prominent in the park and will allow a proper evaluation of the structure. All works around the site will be overseen and monitored by archaeological specialists. Following these works a full condition assessment of the structures (church, graveyard, moat) can be carried out to see what condition they are in and what conservation or restoration might be feasible. However, as indicated above, this is outside the scope of this LPF Variation. Again, while outside the boundary of the LPF, the County Development Plan already contains an objective relating to Fairview Oil Mills as follows: NCBH16 Objective 5: <i>To preserve and develop the Fairview Oil Mills at Cherrywood Crescent in Clondalkin as the remains of the mill are a good example of functional industrial architecture and are an important reminder of the industrial heritage of the Clondalkin area.</i>
--	--	--

		Fairview Mill is on the Record of Protected Structure (RPS) listed in Appendix 3A of the County Development Plan, RPS reference 165. It is also listed on the Record of Monuments and Places (RMP) as DU021-008. As such, notwithstanding that it is outside the boundary of the LPF and this current process, it is considered that it has significant statutory protection being on both the RPS and the RMP. CE Recommendation: No change to Draft LPF.
SD-C367-191 Jamie Thompson	Miscellaneous / Out of Scope The submission suggests enforcement action against planning non-compliance such as shop fronts and the flats opposite of Molloy's.	CE Response: Enforcement queries should be directed to the planning enforcement section of the Council. The LPF being a policy document and has no role in relation to enforcement issues. CE Recommendation: No change to Draft LPF.
SD-C367-158 Christopher Conway	Miscellaneous / Out of Scope The submission notes that the Katherine Tynan House is in a poor condition and to prevent further deterioration, the SDCC 2022 permission to restore it and open a visitor/community centre should begin as soon as possible.	CE Response: It is noted that Katherine Tynan House is located outside of the boundary of the LPF area off the Belgard Road. Therefore, the LPF has no remit in relation to this structure. However, the following is noted: The grant of planning permission referred to in the submission is Reg Ref. SD21A/0148. The proposed description states 'The refurbishment of Katherine Tynan House, or 'Whitehall', a Protected Structure (RPS ref.197),

		with change of use from disused dwelling to community centre. Works will entail refurbishment of the roof and external walls; reinstatement of windows and external doors; ceilings and floors; reinstatement of a conservatory and glazed porch (10sq.m and 5sq.m respectively); new internal stairs and doors; new services and sanitary accommodation; two new single storey open-fronted structures on part of the footprint earlier outbuildings with an enclosed area for toilets (534sq.m); refurbishment of historic garden walls and gates; upgrading of the existing non historic entrance and approach from the Ballymount Road; and provision for parking on site.' It is noted that the site is in private ownership. The owners secured grant funding under the Architectural Conservation grant scheme (Built Heritage Investment Scheme) approximately 5 years ago, which supported the repair of the roofs and other urgent repairs to prevent any further deterioration of the buildings. The planning application was granted permission for a new use as a community building; however, this has not been implemented, and the Architectural Conservation Officer has no further update. CE Recommendation: No change to Draft LPF.
--	--	--

Chapter 8: Urban Design Strategy

Integrated Design Approach		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	Integrated Design Approach The submission supports the integrated design approach and the strategic objectives in the chapter and notes that there are comprehensive strategic objectives for the chapter detailed under each heading. It is stated that there are few specific design and placemaking objectives and assumes that these are not needed because the county development plan's existing policies cater for design expectations. The submission recommends that this could be emphasised in the preamble to the policies in the LPF.	CE Response: The support for the integrated design approach and acknowledgement of comprehensive strategic objectives in the Urban Design Strategy is welcomed. The assumption that the County Development Plan (of which this plan, by way of Variation will become a part if adopted) caters for design expectations through its existing policies is correct. However, the LPF contains clear design direction through the strategic objectives set out in Chapter 2 and through the more detailed objectives within each chapter and where within chapter 8 specifically the sections detailing framework and opportunity sites. This is emphasised in the paragraph in section 8.2 on Integrated Design Approach. However, for clarity this paragraph could be revised to reflect the recommendation of the Heritage Council. CE Recommendation: Amend paragraph 8 of section 8.2: From

		These overarching strategic urban design objectives, set out below, should be read alongside the detailed objectives set out within each chapter of the LPF and the specific context to which they are applied within the different framework sites. To These overarching strategic urban design objectives, set out below, should be read alongside the detailed objectives set out within each chapter of the LPF and the specific context to which they are applied within the different framework and opportunity sites. They are further supported by the objectives set out in Chapter 5 of the County Development Plan – Quality Design and Healthy Placemaking.
--	--	---

Urban Design - General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-95 The Heritage Council	Urban Design – General The submission recommends adding a general objective for 'other classes of development', given that development types go beyond industrial/commercial and residential.	CE Response: Chapter 8 includes Section 8.3 Urban Design – General. This section provides objectives for areas which are not covered in greater detail through the framework and opportunity sites. They reflect the fact that for much of the LPF area the County Development Plan contains the relevant objectives against which planning applications will be assessed. This includes for the existing residential areas outside the village centre and the existing industrial estates within the LPF

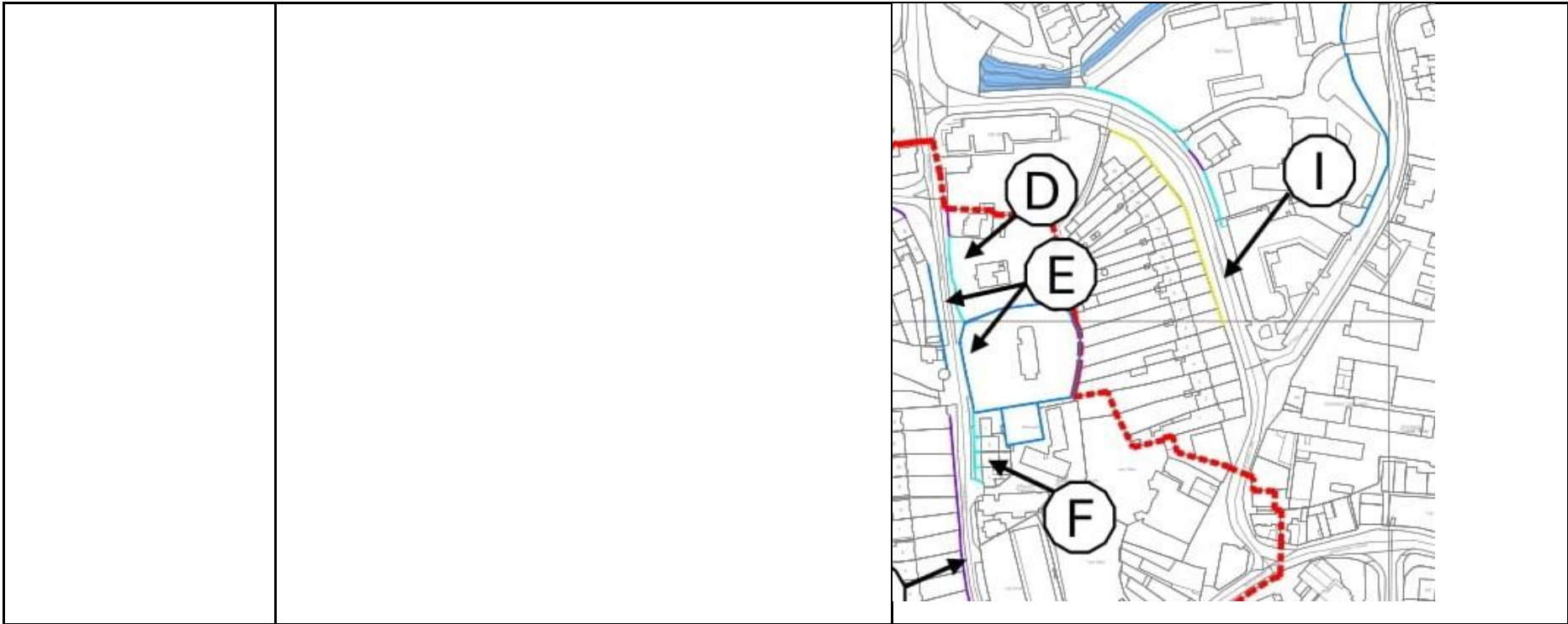
		boundary. Most types of development will fall within the residential, commercial / industrial land use type. Importantly, there are several objectives within the LPF which cover specific types of development outside of residential, commercial and industrial including within the Conservation and Built Heritage chapter (for example walls, bollards, utility structures and signage) and in Chapter 5 (for example, to reduce visual clutter such as unnecessary poles, overhead cables). As such it is considered that there are sufficient and relevant policy and objectives in the LPF and within the County Development Plan to ensure that there is appropriate policy support for planning decisions. CE Recommendation: No change to Draft LPF.
--	--	---

Urban Structure		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Urban Structure With regards to increased planting from Newlands Cross to St Brigid's Well as stated within the Green Loop Spine objectives on page 85, the submission queries will the council protect the historic infants' burial ground south of St Brigid's Well.	CE Response: The submission is noted. The green loop spine objective in question is addressed in Section 8.4 on page 85 of the LPF and states as follows; <i>'Promote increased planting at the green space at Newlands Garden Centre and from the southern end of Fonthill Road from Newlands Cross to St. Brigid's Well as part of a pilot</i>

		<i>for grey to green surface water proposals, ensuring that the setting of St. Brigid's Well is protected.'</i> The provisions of the LPF provide for additional planting and GI elements only where appropriate and following assessment of potential. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	Urban Structure The submission requests that the council clarifies 'grey to green surface water proposals' and asks does it improve the water quality in St. Brigid's Well.	CE Response: "Grey to green drainage" refers to the shift from conventional, hard-engineered drainage systems ("grey infrastructure") to nature-based solutions ("green infrastructure") for managing surface water. Instead of quickly piping rainwater away, which can lead to flooding and pollution, the "grey to green" approach uses techniques like permeable paving, rain gardens, green roofs, and swales to manage and clean water in a more sustainable, nature-based way. This approach is also known as Sustainable Drainage Systems (SuDS). The South Dublin County Council SuDS Explanatory, Design and Evaluation Guide states (Section 8.6 on page 77) indicates that 'Rainfall picks up pollution from development surfaces. As runoff moves slowly through SuDS components most pollution is removed through sedimentation, filtration and bioremediation. Naturally occurring processes in many SuDS components break down organic pollution, meaning that there is no build up or need for removal of this pollution

		over time. Using source control and the management train, SuDS provides a controlled flow of cleaned water through the development.' Implementation of grey to green/SuDS infrastructure will improve water quality of surface water downstream of the infrastructure, including rivers/streams they discharge to. 'Grey to green surface water proposals' will therefore benefit water quality in the area within which St. Brigid's Well is located. CE Recommendation: No change to Draft LPF.
--	--	--

Village Centre Framework Site		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Village Centre Framework Site The submission queries whether the council will correct Figure 8.10 on Page 91 and the fosse line as it is not limited to the concrete buttress. The submission notes that on Page 75 it states, "The distinctive curve of Orchard Road follows the boundary of the former monastic enclosure (fosse)."	CE Response: The fosse where it is wholly legible either on site or on review of maps is outlined on Figure 8.10 in a yellow colour.



		 Plinth on Orchard Rd. indicative of line of fosse. The fosse has been identified to the extent possible without detailed archaeological examination. This type of archaeological work is not possible at this time. Having regard to this, the map shown in Figure 8.10 and the description of the fosse, alongside this area being within an archaeological zone of notification is considered sufficient to support the assessment of any planning applications. CE Recommendation: No change to Draft LPF.
--	--	--

Mini Frameworks		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-170 Clonmill Limited	Mill Centre Car Park BDP, acting on behalf of the Mill Shopping Centre Clondalkin, have made a submission on the mini framework relating to the Mill Centre car park. They acknowledge that the LPF will play a significant role in shaping the character and functionality of Clondalkin, welcoming some of the proposals described but highlighting issues with certain proposals outlined on the shopping centres lands. The submission focuses on the Mini Framework Site's proposal which interact with the Mill Centre lands and its impact on parking, access, servicing and maintenance for the centre. The submission states that a significant amount of development is proposed in the Mill Shopping Centres car park which is in private ownership. This includes the creation of new roads and pathways to connect to the Ninth Lock Framework, with the proposed new access route towards the Ninth Lock Framework (Section 8.5.2) impacting on key operations of the centre. The main issues are provided below: □ Proposed de-culverting and movement opportunities outlined will impact the operation and service of the centre.	CE Response: The LPF provides a planning framework for development within Clondalkin. As part of this, the Urban Design Strategy has identified lands, whether they are public or private, which may come forward for development in the future. These are identified as larger framework sites, mini-frameworks or opportunity sites. For each, key design parameters are identified to guide development should it come forward. The decision whether or not it comes forward is one for the relevant owner/s. The car park area within the Mill Shopping Centre is identified as a mini-framework site, recognising that there is potential for some development and the owner at any time could make a decision to bring this forward. Given its location, adjacent to the large framework site behind the shopping centre, there are clear opportunities to ensure that potential linkages between the sites are not lost. Such linkages would be primarily for walking and cycling – to provide easy access to new populations to the village and to the shopping centre itself and to make journeys shorter and more direct for those coming from the village side to the train station and to the new community. As such, it is considered very important to retain these potential linkages in the LPF.

	□ The mini framework proposal will impact future development opportunities for the Mill Centre. □ It is estimated 215 parking spaces will be lost from the proposed movement routes along the culvert, which amounts to over a quarter of the car parking within the centre. Parking should be maintained as it is well utilised, will have an impact on the day-to-day operation of the centre and given the age profile of the local community will have implications on those attending the centre. □ The loss of 215 car parking spaces will also the loss of the existing operational service circulation which facilitates the potential connections to the Ninth Lock Road, impacting tenants. □ The former Mill Taxicab offices have been removed and replaced with a proposed roadway within the Mini Framework, though the building houses key infrastructure for the operation of the centre and has an existing weight limitation. □ The proposed de-culverting / creation of a GI landscape / active travel route will lead to the loss of urban space for the centre. This will lead to impact on current access, pedestrian footpaths and car parking requiring a complete	There may also be potential for vehicular access from the Ninth Lock Framework site to the service area of the Shopping Centre through new road infrastructure from New Nangor Road. This would facilitate an access for delivery vehicles which could avoid driving down the Ninth Lock Road and help reduce congestion in the village itself. Again, it is considered important to retain the potential for this access point in the design parameters for both the Ninth Lock Framework and the Shopping Centre lands. The need for any further vehicular access points would need to be subject to more detailed assessment at the time of a planning application. However, Figure 8.32 indicates vehicle movement through the Mill Centre into the Ninth Lock Framework site, it is considered that this should be removed and replaced with the long term high capacity public transport route, as identified in the adopted County Development Plan. This change will also reflect the design parameters included for the Ninth Lock Framework site. The exact location of any access point, whether active travel or vehicular, would need to reflect any existing constraints as outlined in the submission. This includes location of existing services, internal shopping centre access requirements etc. On the issue of the culvert, it is a policy of the County Development Plan to de-culvert where possible. In terms of green infrastructure, deculverting was identified as an opportunity as part of any future development on the shopping centre site. While deculverting could add greatly
--	---	---

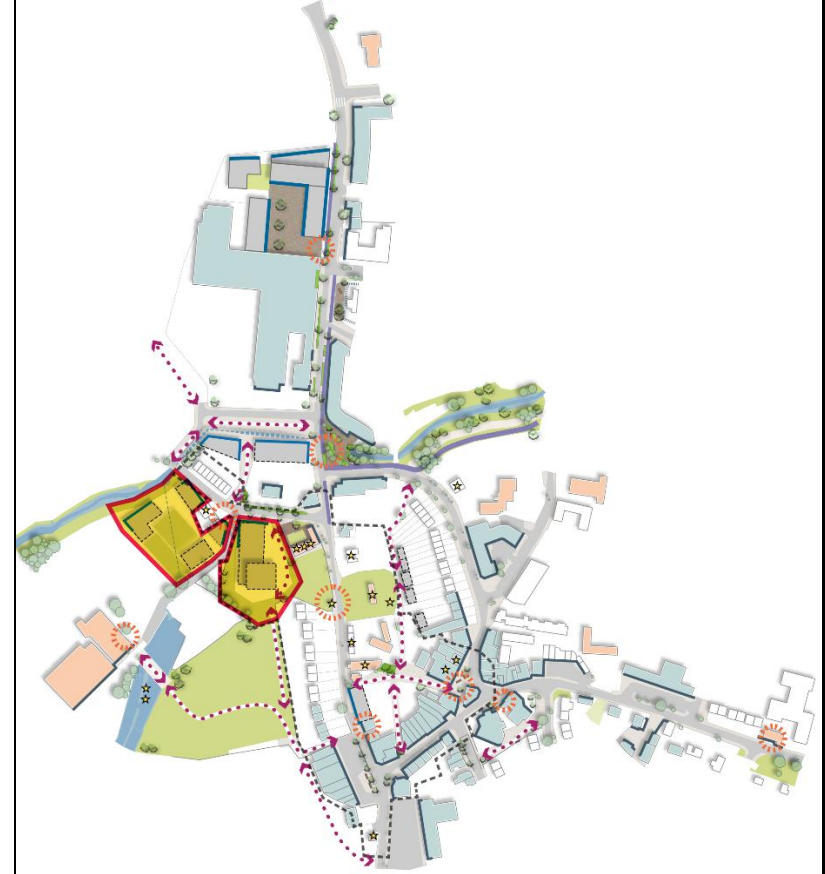
	redesign and creating short and long term disruption to the busy retail centre. Though the Mini framework plan proposes development opportunities with proposed units aligning to the path of the Camac, the location of them overshadows the proposed active route outlined in the LPF, the existing car park and the Mill Shopping Centre. This is turn will reduce the Mill's visibility and street presence on Tower Road and Old Nangor Road.	to placemaking within Clondalkin and to the environment around the shopping centre, it is recognised that there may be feasibility and other issues which make it difficult to achieve. The Council would be willing to work with the landowner to investigate whether there are any funding mechanisms which could help bring this forward. The submission is concerned at the estimated loss of car parking spaces that development may necessitate. Should development come forward, consideration would have to be given to the rationalisation of car parking, ensuring that it continues to meet the needs of those using the shopping centre. The mini-framework is not requiring development on the site but it is recognising that there may be potential on the site for development and in that regard, it is setting out design parameters to guide development in the event that a planning application comes forward. It is also noted that SM5 Objective 3 needs to be changed for clarity purposes: <i>To ensure that new development and key lands maximise the potential for active travel connectivity between the site to the village centre, local services and schools and to public transport'</i> CE Recommendation: Amend SM5 Objective 3:
--	--	---

		From <i>‘To ensure that new development and key lands maximise the potential for active travel connectivity between the site to the village centre, local services and schools and to public transport’</i> To <i>‘To ensure that new development and key lands maximise the potential for active travel connectivity between areas outside the village centre, including the Ninth Lock Framework site, to the village centre, local services and schools and to public transport.’</i> And Amend Figure 8.32 on page 104 to 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.
--	--	--



Mini Frameworks (continued)		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Mill Centre Car Park The submission requests that the council should consider de-culverting a section of the River Camac at the car park between the Old Nangor Road entrance to the Mill Shopping Centre. This is in the interest of improving biodiversity, sense of place and increase visual amenity to the adjoining stone parapets of the historic bridge on Old Nangor Road.	CE Response: The submission is noted. The LPF includes objectives that support de-culverting of the River Camac including: VF 2: <i>Encourage the de-culverting of the Camac to support the integrity of the Camac riparian corridor, increase opportunities for biodiversity and significantly improve placemaking opportunities for the wider village.</i> VES1 Objective 4: <i>To support the redevelopment of the Civic Plaza to provide an attractive urban space as part of a cohesive design with provision for an appropriate mix of hard and soft surfaced areas; de-culverting the River Camac where feasible or where not, the planting at ground level where the river is culverted, in the interest of representing the corridor by way of soft proposals; to provide a visually and functionally successful space, accommodating use by people of all ages and abilities, enhancement of biodiversity through urban greening including nature-based SuDS features.</i> CE Recommendation: No change to Draft LPF.

SD-C367-55 Cllr Francis Timmons	Old Nangor Road Infill Site The submission refers to Figure 8.15 on page 83 of the Local Planning Framework and requests that the image makes clear whether the Old Nangor Road is one or two way.	CE Response: The submission is noted. For clarity, it is noted that Figure 8.15 is on page 93. The image on Old Nangor Road is intended to convey that it remains two way. However, it is acknowledged that the graphics could be improved to make this more clear. It is also noted that the site location of the Old Nangor Road Mini Framework in Figure 8.13 is incorrect and needs to be corrected. CE Recommendation: Amend Figure 8.13 on page 93 to illustrate the correct location of the Old Nangor Road Mini Framework location.
--	---	---

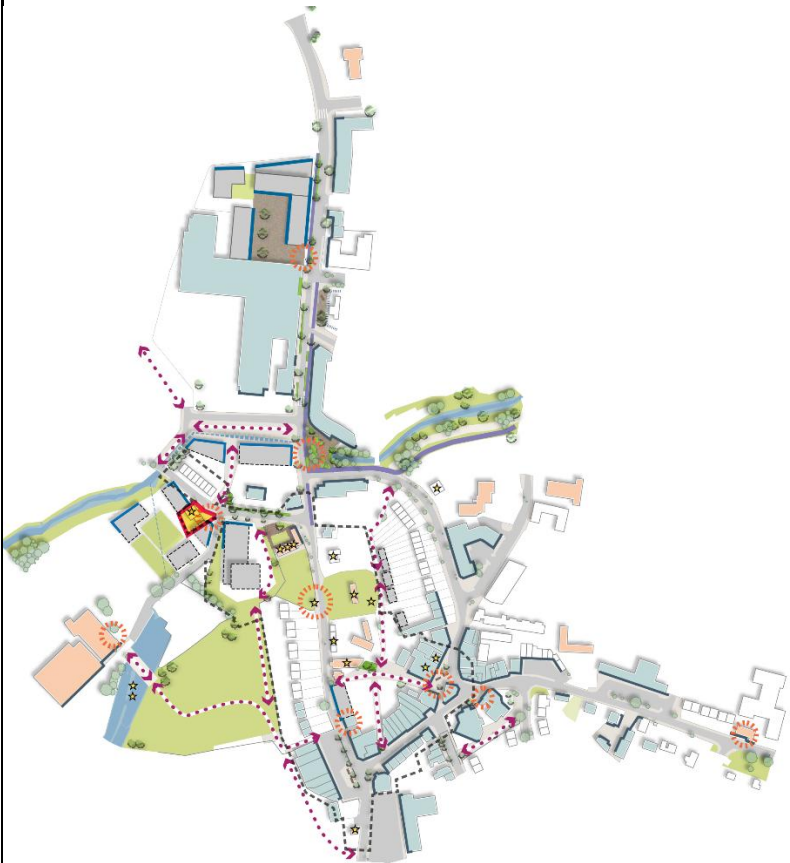


And amend Figure 8.15 on page 93 to illustrate more clearly that Old Nangor Road is two way.

		
SD-C367-71 Office of Public Works	Old Nangor Road Infill Site The OPW welcomes Objective VF5 which relates to Old Nangor Road Flood Risk.	CE Response: The content of the submission is noted and welcomed. Objective VF5 states as follows: ‘Ensure that no new development takes place within the flood plain of the Camac River at the Old Nangor Road until such time as the measures required as part of the Camac Flood Alleviation Scheme are known (See SFRA accompanying this LPF).’ CE Recommendation: No change to Draft LPF.

Opportunity Sites		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-53 Cllr Francis Timmons	RIC Barracks The submission requests that the RIC Barracks known as Riverside House is in private ownership, this should be stated in the Framework.	CE Response: Section 7.2 of the Conservation and Built Heritage chapter sets out the policy context for conservation. In that section, the CDP objective NCBH20 SLO1 is repeated for clarity as policy context for the LPF. The existing CDP objective states: To investigate the purchase and development of the old RIC Barracks on the Old Nangor Road which is a Protected Structure within the present Architectural Conservation Area (ACA). Nonetheless, amended text could be included in Chapter 8 on the adaptive reuse of the old RIC Barracks (Riverside House) as follows: Amend first paragraph on page 94: from <i>'The protected structure of Riverside located on the Old Nangor Road (see Figure 8.16) is a five-bay, two-storey house with small gardens to the front and back from circa1820. The building has been vacant for several years and forms an important part of the streetscape and western boundary of Clondalkin.'</i> To the following wording

		<i>'The protected structure of Riverside House located on the Old Nangor Road (see Figure 8.16) is a five-bay, two-storey house with small gardens to the front and back from circa1820. The building is in private ownership and has been vacant for several years and forms an important part of the streetscape and western boundary of Clondalkin.'</i> It is also noted that the Old RIC Barracks site location map is excluded from page 94. CE Recommendation: Amend first paragraph on page 94: from <i>'The protected structure of Riverside located on the Old Nangor Road (see Figure 8.16) is a five-bay, two-storey house with small gardens to the front and back from circa1820. The building has been vacant for several years and forms an important part of the streetscape and western boundary of Clondalkin.'</i> To the following wording <i>'The protected structure of Riverside House located on the Old Nangor Road (see Figure 8.16) is a five-bay, two-storey house with small gardens to the front and back from circa1820. The building is in private ownership and has been vacant for several years and forms an important part of the streetscape and western boundary of Clondalkin.'</i>
--	--	--

		And insert the following map on page 94. 
SD-C367-81 Irish Water	Water Tower UE note that there are watermains running adjacent to the water tower going across Monastery Road (to the east) that will need access and wayleave to be maintained.	CE Response: The submission is noted. Any works affecting the Water Tower will be carried out in consultation with UE and any other relevant service providers impacting the site. Access and wayleave to any

		watermains will be maintained as part of any future development. CE Recommendation: Add an additional parameter within the Water Tower section on page 95: Ensure access and wayleave to the watermains which run adjacent to the water tower, going across Monastery Road, are maintained.
SD-C367-95 The Heritage Council	Opportunity Sites The submission welcomes the identification of opportunity sites and recommends that key natural and cultural heritage features be identified for each site.	CE Response: On page 94, the text within the section on Adaptive Reuse of the Old RIC Barracks identifies that the building (also known as Riverside House) is a protected structure. Regarding the Dutch Village, it is considered appropriate to add an additional bullet point under the parameters for development relating to the protection of the Monument on the site (Mon. No. DU017-043---). The Water Tower has been identified as an opportunity site given its cultural importance as an entrance to Clondalkin. The Water Tower is described as a landmark and has the potential to enrich the character of the built environment and public realm and contribute to the distinctiveness of an area. Furthermore, as part of the development management process and consideration of planning applications, key

		natural and cultural heritage features relevant to a site are taken into consideration as standard practice. CE Recommendation: Add an additional bullet point under the parameters for development relating to the Dutch Village on page 95 to state: To take account of the recorded monument status of the adjacent existing monument (Mon. No. DU017-043---).
--	--	--

Village Enhancement Schemes		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-81 Irish Water	Village Enhancement Schemes UÉ note that planned public realm and road projects have the potential to impact on UÉ assets and projects, with early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable UÉ to plan works accordingly and ultimately minimise disruption to the public.	CE Response: The submission is noted and agreed. Engagement will be undertaken with UÉ in advance of any planned projects. CE Recommendation: No change to Draft LPF.
SD-C367-55 Cllr Francis Timmons	Ninth Lock to Old Nangor VES A number of submissions suggested that the space outside the Civic Offices could be used for local events such as festivals, Christmas, open air art and fun performances and to enable a civic community	CE Response: The Urban Design Strategy set out in Chapter 8 includes policy objectives for two Village Enhancement Schemes. One of the schemes is identified as VES1: Ninth Lock to Old

SD-C367-138 Paul Gogarty TD SD-C367-159 Monica McGill	space. It is suggested in one submission that there should be an uninterrupted view of the space to allow for greater visibility of events taking place, including from the car park in the Mill Centre. It was also suggested that the space could allow for views into the atrium of the Civic Offices which itself could be converted to provide for live performances, exhibitions and other community activities. Another submission suggested that the Civic Plaza should be as large as possible and future-proofed for events, recommending a large market square type canopy to make it weather proof, permanent covered seating areas and space for stalls, concerts etc.	Nangor VES. This includes for the area around the Civic Plaza and provides for related objectives as follows: VES1 Objective 4: <i>To support the redevelopment of the Civic Plaza to provide an attractive urban space as part of a cohesive design with provision for an appropriate mix of hard and soft surfaced areas; de-culverting the River Camac where feasible or where not, the planting at ground level where the river is culverted, in the interest of representing the corridor by way of soft proposals; to provide a visually and functionally successful space, accommodating use by people of all ages and abilities, enhancement of biodiversity through urban greening including nature-based SuDS features</i> And the following specific design parameter: <i>Facilitate the re-design of the Civic Plaza at the Clondalkin Civic Office as a key node within the village centre integrating it into the emergence of the Ninth Lock Road VES and active travel schemes.</i> While the design of the Civic Plaza and wider VES schemes will be guided by the objectives set out in the LPF, the detail of any scheme will be subject to the Part 8 process or its equivalent under the 2024 Planning Act. However, the need for it to accommodate civic engagement is recognised and additional wording to the design parameter is recommended. CE Recommendation:
---	--	--

		Amend the wording of the Ninth Lock Road to Old Nangor Road VES Design Parameters which sit under the heading Urban Design, first bullet point, on page 96 of the LPF: From <i>Facilitate the re-design of the Civic Plaza at the Clondalkin Civic Office as a key node within the village centre integrating it into the emergence of the Ninth Lock Road VES and active travel schemes</i> To <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.</i>
SD-C367-55 Cllr Francis Timmons	Main Street VES The submission refers to UD6 Objective 1 and states that Pope Lane should be unobstructed, accessible and available to pedestrians and wheelchair users.	CE Response: The Urban Design Strategy set out in Chapter 8 includes policy objectives for the Village Enhancement Scheme identified as Main Street VES. This includes for the area around Pope Lane and provides for the objectives as follows: UD6 Objective 1: <i>To support the preparation of the Village Enhancement Scheme (VES) from the junction of Tower Road, Main Street, along Main Street to the east as far as the Black Lion junction of Main Street / Orchard Lane / New Road (Laurel Park) / Monastery Road, encompassing Pope Lane. The delivery of the VES may be phased.</i>

		And UD6 Objective 2: <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 and Laurel Park to provide for an improved pedestrian and cycle environment, urban greening and nature-based SuDS features where feasible, and increased activation, making it more vibrant, engaging, and welcoming for all.</i> Design Parameters are set for the scheme under various headings including one under Urban Spaces as follows: <i>Improve the current environment for pedestrians through reimagining of currently underutilised space within the public realm.</i> And <i>Ensure the VES benefits businesses through an Improved public realm, with appropriate street furniture where space allows (e.g. seating) encouraging greater footfall and street activity.</i> The overarching objectives within the Urban Design Strategy include the need to provide a quality public realm and enable the safe and comfortable movement of all users. Under the overarching objective to Deliver quality and sustainable planned growth for Clondalkin on page 80, the following objective is also relevant:
--	--	--

		<i>Encourage positive community engagement and a vibrant local economy through good accessibility and a quality public realm which provides for inclusive design and universal access for all to the greatest extent possible.</i> The design of the Civic Plaza and wider VES schemes will be guided by the objectives set out in the LPF, including the overarching objectives as outlined above. While the detailed design of any scheme will be subject to the Part 8 process or its equivalent under the 2024 Planning Act, it is considered that the LPF contains sufficient objectives to respond to the submission. However, to provide clarity, it is considered that UD6 Objective 2 could be amended to explicitly include Pope Lane in UD6 Objective 2. CE Recommendation: Amend UD6 Objective 2 on page 98: From <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 and Laurel Park to provide for an improved pedestrian and cycle environment, urban greening and nature-based SuDS features where feasible, and increased activation, making it more vibrant, engaging, and welcoming for all.</i> To
--	--	---

		<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 features where feasible, and increased activation, making it more vibrant, engaging, and welcoming for all.</i>
--	--	---

Large Scale Development Frameworks		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-55 Cllr Francis Timmons	Knockmeenagh Framework Site The submission states that Figure 8.35 should be 'St Bridgets Cottages' and be clear that they are part of the ACA. The submission also asks if all St. Bridget's Cottages are in the ACA.	CE Response: The submission is noted. St Brigid's Cottages are part of their own individual ACA, as detailed on the map in Figure 8.34 which shows that the frontages of the cottages are included in the ACA extending from Knockmeenagh Lane to the N7. There is a supporting document for St. Brigid's Cottages which accompanies the LPF 'St. Brigid's Cottages Architectural Conservation Area 016 Character Appraisal and Recommended Safeguarding Policies'. CE Recommendation: Amend Figure 8.35 on page 106: from

		<i>'St. Brigid's cottage within ACA.'</i> To <i>'St. Brigid's cottages within the ACA.'</i>
SD-C367-159 Monica McGill	Knockmeenagh Framework Site The submission requests clarification of a drawing on Page 107 which relates to the proposed walkway and cycleway along Knockmeenagh Lane. It raises concerns about the lack of available space for separate paths, and some places have steep fall-aways. The quarry is on one side and a manufacturer on the other side. It also asks what adjustments the council intends to make if shared use by cyclists and pedestrians are to use the same pathway, given the lack of current safety and space limitations.	CE Response: The drawing being referred to is indicative to show the concept of how the historic integrity of the lane can be protected while facilitating improved facilities for walking and cycling. The point of it is to protect the lane / Slí Mhór insofar as it exists at the eastern end of the lane and to show how, as part of any future development to the south of the lane separate wider space for active travel could be provided. It would require a build up of land to achieve and this will have to be dealt with in future masterplans for the area so that it can be integrated into layouts as opportunity arises. It is not something that would be achievable in the short term. The drawing being referred to is Figure 8.36, which states there is an 'Opportunity to improve access along Knockmeenagh Lane as part of any future development while protecting its historic integrity – indicative only'. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	Knockmeenagh Framework Site The submission queries whether the council owns the undeveloped land shown to the left of St. Brigid's	CE Response:

	Cottages. Figure 8.37 on page 108 is unclear compared with the written text.	The Council do not hold, nor never have held, any interest in the site referred to. It is privately owned. CE Recommendation: No change to Draft LPF.
SD-C367-55 Cllr Francis Timmons	Knockmeenagh Framework Site One submission requests that the size and location of the central open space at Knockmeenagh Framework Site to be stated and mapped.	CE Response: The purpose of the frameworks within the LPF is to provide a framework for development for the lands. To this end development parameters are in place to guide future development. Under the development parameters it is clear that open space has to be delivered in accordance with the standards set out in the County Development Plan. These are the adopted standards of 2.5 hectares per 1000 population set out in Chapter 8 of the CDP. The exact detail of the quantum appropriate for the site will only be known as part of the assessment of any planning application, being dependent on the population equivalent in the proposal to calculate the exact amount of open space required. CE Recommendation: No change to Draft LPF.
SD-C367-145 Red Network	Knockmeenagh Framework Site The submission welcomes the zoning objective (KF1 Objective 1) for the Knockmeenagh Framework Site. States that any development needs to adhere to the objectives/requirements of the plan.	CE Response: The detail of the submission is noted. All proposed development within the LPF area will be required to comply with the provisions of the LPF document and the CDP. CE Recommendation:

		No change to Draft LPF.
SD-C367-55 Cllr Francis Timmons SD-C367-159 Monica McGill	Knockmeenagh Framework Site One submission states that KF3 Connectivity should detail that Slí Mor / Knockmenagh lane should just be for pedestrians as it is an important historical site that is one of the 5 Ancient Pre christian roadways of Ireland connecting Dublin City with County Galway. Another submission queries whether the council will liaise with the landowners along the Slí Mhór to raise awareness of its heritage to prevent erosion/damage on the route.	CE Response: Chapter 8 Urban Design Strategy includes a section on Knockmeenagh Framework Area. This section includes <i>KF3 Connectivity</i> as one of a series of overarching objectives relating to connectivity from the framework site to the surrounding areas. KF3 Objective 1 states the following: <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 connections to and from the framework site to the Lane and further northwards.</i> Knockmeenagh Lane at its eastern end is currently only in use for pedestrians and cyclists and is an important active travel linkage from New Road to Monastery Road, amongst other things facilitating access to the Luas. The objective is quite clear that the historic integrity of the Lane and Slí Mor is to be protected. Figure 8.36 gives a graphic example of how this could be achieved while protecting the historic integrity of the lane. However, to avoid any doubt as to the intention of the objective the following amendments is recommended to KF3 Objective 1: <i>To protect the historic integrity of Knockmeenagh Lane and associated Slí Mor while supporting sensitive solutions to its</i>

		<i>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.</i> Options to raise awareness of the historic nature and cultural heritage value of this laneway can be considered under the County Heritage Plan. CE Recommendation: Amend KF3 Objective 1 on page 109: From <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 connections to and from the framework site to the Lane and further northwards.</i> To <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.</i>
--	--	---

General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-111 Katie Goodwin	General One submission requests a definition of healthy placemaking.	CE Response: The LPF will be incorporated into the County Development Plan as an appendix on adoption of the Variation. The County Development Plan in Chapter 5 Quality Design and Healthy Placemaking (Section 5.0 on page 182), describes placemaking as aiming ‘<i>to strengthen the connection between people and the places they share, creating the right types of environments in which people can live work, visit, socialise and invest in</i>’, and indicates that this is ‘<i>a key factor in producing attractive and distinctive communities</i>’. The CDP goes on to describe Healthy Placemaking as seeking ‘<i>to protect and enhance the unique identity and character of places and to facilitate improvements to human wellbeing and the quality of life that comes from the interaction of people and their environment.</i>’ CE Recommendation: No change to Draft LPF.
SD-C367-20 Eastern and Midland Regional Assembly	General The submission welcomes this chapter and supports the placemaking-led approach to future development in Clondalkin as it aligns with the core principles of healthy placemaking.	CE Response: The contents of the submission are noted and welcomed. CE Recommendation: No change to Draft LPF.

	The submission supports the inclusion of large-scale development sites, Mini-Frameworks, Village Enhancement Schemes and opportunity sites which will all help guide future development in a coordinated, sustainable manner. This chapter aligns with the RPO's 9.7, 9.8, 9.9 and the submission welcomes measures for urban regeneration and public realm improvement measures that enhance the economic and tourism potential of Clondalkin.	
SD-C367-95 The Heritage Council	General The submission states environmental constraints could be identified as key development considerations for all opportunity/framework sites.	CE Response: The LPF has been environmentally assessed by way of the accompanying Strategic Environmental Assessment (SEA), an Appropriate Assessment (AA) and a Strategic Flood Risk Assessment (SFRA). Each objective in the LPF has been assessed against the relevant environmental objectives. As an example, the SFRA has directly influenced objectives on Old Nangor Road, ensuring that development does not occur until the requirements of the Camac Flood Alleviation Scheme are known. Similarly, overhead electricity wires have informed the parameters for the large framework site at the Ninth Lock Road, as has the known contamination on the site. As part of the development management process and consideration of planning applications, environmental

		constraints relevant to the framework/opportunity sites will be further taken into consideration as standard practice. CE Recommendation: No change to Draft LPF.
SD-C367-72 Land Development Agency	General The LDA support the indicative layout and site parameters located in Section 8.5, 8.6 and 8.7 of the Draft LPF, as they provide a plan-led approach to the redevelopment of sites within the LPF area. The LDA notes it should be made clear that these are indicative and all schemes will be progressed on their own merits, with reference to detailed site assessments and analysis, including site-specific environmental factors. The LDA also notes that flexibility in relation to the specified metrics is necessary for a more tailored approach to development, with specific targets or limits preventing the evolution of truly considered development.	CE Response: The submission is noted. The first paragraph in section 8.5 on page 86 states: ‘This section provides parameters and objectives which will guide the future growth and development of Clondalkin for the Village Framework Area and associated Mini-Frameworks, Ninth Lock Road Framework, Knockmeenagh Framework, the Village Enhancement Schemes (VES) and identified Opportunity Sites.’ To that effect, the purpose is to provide clear development parameters to guide future development, facilitating the required more detailed design in the achievement of high quality development. CE Recommendation: No change to Draft LPF.
SD-C367-95 The Heritage Council	General The submission states that this chapter could link back to the GI chapter regarding new spaces and places which should foster civic engagement combined with	CE Response: Green Infrastructure (GI) is one of the key considerations within the LPF. The overall strategy and detailed objectives for GI are set out within Chapter 4 of the LPF supporting the

	soft landscaping and quality public realm design. Such designs could then allow for landmark buildings to backdrop to public spaces. The submission identifies locations such as Tower Road, the connection between the Round Tower and Nangor Road, and Convent Road that would benefit from interventions such as new surface materials and soft landscaping to improve permeability. Additionally, the junction of Main Street, Monastery Road and Orchard Lane could benefit from public realm improvements.	County GI Strategy through greater local detail, identifying gaps and opportunities. This is brought forward into the integrated design approach of the Urban Design Strategy in Chapter 8 of the LPF. By way of example, while not exhaustive, for the areas identified in the submission the following design principles which support the GI Strategy are set out in the Urban Design Strategy: For the Village Centre Framework site: ‘Enhance biodiverse soft landscaping within the village and seek to create connections and new stepping stones enhancing the existing GI network Encourage new development to provide niches of open space or urban pocket parks as buffers to transition between the historic village and new development. Village Enhancement Scheme (VES): The Ninth Lock Road and Old Nangor Road VES and Main Street VES offer opportunities to redistribute space towards pedestrians, cyclists, planting and activation while maintaining vehicular access. This can be achieved through public realm and streetscape improvements such as tree planting, widening footpaths, creating active travel routes, and implementing nature-based solutions, including SuDS.’ And is explicitly linked back to the GI Strategy by the following:
--	---	---

		'New development/re-development within the Village Framework Area shall address any gaps identified in the GI assessment in Chapter 4 of this document. Demonstrate how green links that intersect with the village centre (GI Stepping Stones) set out in detail in chapter 4 of this document under GI3 are incorporated into and will be delivered through any future development/re-development within the Village Centre'. The VES objectives similarly integrate with the GI strategy, for example the objectives: 'To support the redevelopment of the Civic Plaza to provide an attractive urban space as part of a cohesive design with provision for an appropriate mix of hard and soft surfaced areas; de-culverting the River Camac where feasible or where not, the planting at ground level where the river is culverted, in the interest of representing the corridor by way of soft proposals; to provide a visually and functionally successful space, accommodating use by people of all ages and abilities, enhancement of biodiversity through urban greening including nature-based SuDS features.' 'To support the rebalancing and redistribution of space within Clondalkin Village, notably from the Ninth Lock Road to the junction with Old Nangor Road, and along Old Nangor Road to the junction with Mill Lane, and towards the Old RIC barracks, to provide for improved active travel, urban greening, including nature-based SuDS features where
--	--	--

		feasible, and increased activation, making it more vibrant, engaging, and welcoming for all. And for the Main Street area VES: 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 and Laurel Park to provide for an improved pedestrian and cycle environment, urban greening and nature-based SuDS features where feasible, and increased activation, making it more vibrant, engaging, and welcoming for all.' Having regard to the degree to which the objectives for the different framework and opportunity sites, alongside the VES objectives have already incorporated the GI strategy in chapter 4, and the explicit objective in the urban design strategy to demonstrate how green links in chapter 4 will be integrated into urban design, it is considered that no further changes are required. CE Recommendation: No change to Draft LPF.
SD-C367-105 Cllr Francis Timmons	General One submission states that public seating should be planned and encouraged. This should be stated in the plan.	CE Response: Chapter 8 of the LPF includes design parameters for Village Enhancement Schemes. These design parameters include for seating, set out as follows in the LPF: 'Incorporate features such as outdoor seating, public art, landscaping, and street furniture that enhance the

		pedestrian experience’ (Activation, bullet 2, Section 8.6.1 on page 96) and ‘Ensure the VES benefits businesses through an Improved public realm, with appropriate street furniture where space allows (e.g. seating) encouraging greater footfall and street activity’ (Urban Spaces, bullet 3, Section 8.6.2 on page 99). It is noted that the detailed design of the VES will come forward through the Part 8 process (or relevant process in the 2024 Act, as appropriate). The design parameters as set out in the LPF clearly provide for seating. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	General The submission questions whether the council will avoid replicating the poorly designed public spaces seen in Tallaght town centre, for example at the County Library, as they are intimidating and do not contribute to way-finding or pride of place.	CE Response: The opinions expressed are noted. The LPF includes detailed objectives relating healthy placemaking and way-finding including: First Strategic Objective: <i>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.</i> CBH4 Objective 1 states as follows: ‘<i>To support placemaking initiatives and village enhancement schemes in making the village and its surrounds more attractive to residents, businesses and visitors, improving the urban</i>

		<i>environment, the sense of identify and community wellbeing.'</i> SM11 Objective 2 states as follows: <i>'To provide well designed wayfinding and signage, consistent throughout the Plan area, which aligns with the forthcoming SDCC Signage and Wayfinding Strategy, and which ties into the historic context of the village.'</i> CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	General The submission queries will the council decide on a single style of street bollards in the village to integrate appropriately with the heritage of the area.	CE Response: The council will consider the standardisation of street furniture as part of any future Village Enhancement Scheme. The intention is to minimise the use of bollards where possible and to standardise the style of street furniture. Section 8.6 of the LPF includes Design Parameters for the Ninth Lock to Old Nangor VES. Within the parameters under the section on Urban Design the second bullet points states: <i>'To support and encourage improved urban design and placemaking, facilitating a visually attractive and welcoming urban village. To deliver guidance addressing street furniture, including bollards, to establish consistency, rationalise street features and remove features that contribute to clutter.'</i> CE Recommendation:

		No change to Draft LPF.
SD-C367-159 Monica McGill SD-C367-184 Janet McKiernan	General One submission queries will the council liaise with the property owner to remove two structures; - A pub extension on Pope Lane which is not visually appealing and hinders pedestrian movement - A smoking hut facing onto Orchard Road which hinders pedestrian movement. Another submission states that An Bord Pleanála approved retention of 'The Lions Den' in January with strict restrictions, however the venue has not followed these restrictions and South Dublin County Council's planning department has not enforced the restrictions.	CE Response: The LPF is a policy document, enforcement issues should be forwarded to the planning enforcement section of SDCC as is the established process. This issue is outside of the remit of the LPF. However, by way of information regarding one of the properties referred to (The Purty Central, 20 Main Street, Clondalkin, Dublin 22), there is presently a live enforcement case on it with enforcement noting an unauthorised structure to rear without the benefit of planning permission. The S154 Notice is due to expire in October 2025, and a further site inspection will be made and followed with report and recommendation. Regarding Quinlan's / 'The Lions Den', there is presently a live enforcement case on it with enforcement noting that the requirements of the enforcement have not been complied with. Accordingly, legal proceedings have been initiated in this matter. Enforcement matters are outside the scope of the LPF. CE Recommendation: No change to Draft LPF.
SD-C367-159 Monica McGill	General	CE Response:

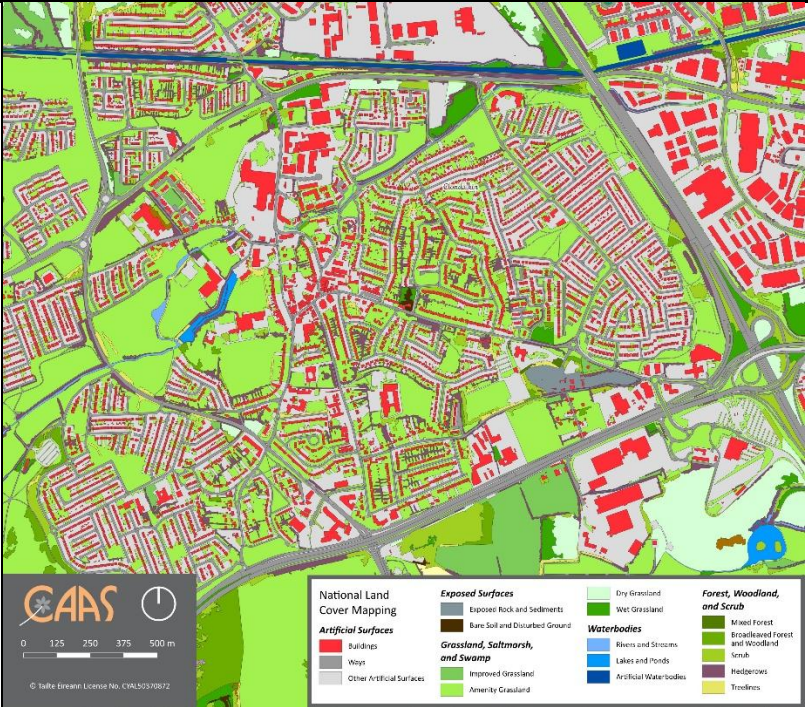
	The submission raises the following queries in relation to naming places and spaces: - Will the council encourage names to align with local heritage? - Will the council discourage the use of non-local place names such as “piazza” or “plaza” in Clondalkin unless linked to official twinning with other European places. Apart from Ireland, is the Irish-language word “Cearnóg” used in any place name? Adopting names from other jurisdictions may dilute the unique heritage identity of the area. - Will the council consider renaming New Nangor Road to differentiate from the original Nangor Road which is now erroneously named on street signs, maps and in this plan as ‘Old Nangor Road’.	The LPF is a policy document, it has no remit in respect of naming places and spaces. It is Council policy that the name chosen for a development must reflect the local and/or historical context of the area in which it is located. This can be achieved by reference to local history, the townland, parish or other long-established name, past industry or employment in the area, local topography, or a well-known association of a significant historical individual, event or custom from the local area. The name proposed to the Naming and Numbering section of the Planning Department must also not duplicate or be easily confused with an existing name in the county or the Greater Dublin Area. This is in the interests of owners, occupiers, visitors, service and utility providers and for rapid emergency service provision. CE Recommendation: No change to Draft LPF.
--	--	--

Chapter 9: Implementation and Monitoring

General		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-145 Red Network	General The submission requests to include 'Through the purchase of sites by the council' in the implementation section for the objective 'Deliver quality and sustainable planned growth for Clondalkin' on Page 115.	CE Response: The submission is noted. However, it is considered sufficiently covered by the following wording within the implementation section: ‘The implementation will require a collaborative approach across a number of stakeholders including South Dublin, as well as private landowners.’ CE Recommendation: No change to Draft LPF.

Environmental Reports

Strategic Environmental Assessment		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-111 Katie Goodwin	Strategic Environmental Assessment The submission outlines that the SEA uses Corine 2018 data to scope habitats and asserts that the National Land Cover Map should have been used as it provides better accuracy. The submissions asks the council for an explanation regarding this.	CE Response: The submission is noted, and it is considered appropriate to add Táilte Éireann National Land Cover Map along with associated text into the Strategic Environmental Assessment Environmental Report. CE Recommendation: Add Táilte Éireann National Land Cover Map into the Strategic Environmental Assessment Environmental Report in section 4.

		 National Land Cover Mapping Artificial Surfaces Buildings Ways Other Artificial Surfaces Exposed Surfaces Exposed Rock and Sediments Bare Soil and Disturbed Ground Grassland, Saltmarsh, and Swamp Improved Grassland Amenity Grassland Waterbodies Rivers and Streams Lakes and Ponds Artificial Waterbodies Dry Grassland Wet Grassland Forest, Woodland, and Scrub Mixed Forest Broadleaved Forest and Woodland Scrub Hedgerows Tree Lines © TáiTe Éireann License No. CVA/553708/2
		Add wording that will be inserted into the Strategic Environmental Assessment Environmental Report to accompany the TáiTe Éireann National Land Cover Map in section 4: “The TáiTe Éireann National Land Cover Map shows land cover across the Clondalkin area, including artificial surfaces, grassland, waterbodies and hedgerows.”
SD-C367-23 EPA	Environmental Protection Agency	CE Response:

	The Environmental Protection Agency (EPA) state it is their role to focus on the promotion of full and transparent integration of finds of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed. A 'self-service approach' using the 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' is requested. SDCC should ensure that the variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objective and policy commitments of the National Planning Framework and the Eastern Midlands Regional Spatial and Economic Strategy (RSES). The EPA make reference to the preparation of a SEA Statement once the variation is adopted. A copy of the SEA Statement should be sent to any environmental authority consulted during the SEA process. The EPA have submitted a list of environmental authorities within their submission, based on SEA Regulations.	The submission and the need to prepare an SEA statement and send to the relevant environmental authorities is noted. CE Recommendation: No change to the SEA Environmental Reports.
--	--	---

Strategic Flood Risk Assessment (SFRA)		
Submission No.	Submission Summary	CE response and recommendation

SD-C367-71 Office of Public Works	SFRA Section 3.2.6 The OPW note that the SFRA Section 3.2.6 uses the high end future scenario 1% AEP and 0.1% AEP to define the flood zones for Clondalkin. This approach is consistent with flood zones in the County Development Plan. While the OPW welcomes that SDCC has applied a precautionary approach to climate change, it should be noted that Flood Zones are defined on the basis of current risk, as set out in Section 2.24 of the Guidelines. The Planning Authority should consider including the present-day flood risk mapping for Clondalkin to demonstrate the current predicted flood risk. The OPW also state that no plan-making justification tests have been supplied for existing zonings that area at risk of flooding such as Town Centre (TC), Village Centre (VC) and Residential (RES). They also mention the Department of Environment, Community and Local Government Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas located in Flood Zone A and B. The OPW go on to state, “where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced”. Nature Based Solutions and SuDS The OPW state that the guidelines recommend that the SFRA provide <i>‘guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites’</i>, as well	CE Response: The submission is noted. It is also noted that this is an observation contained in the OPR’s submission and is as follows: ‘Having regard to flood risk management, and in particular, the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and the recently published LAWPRO’s planning guidance on Implementation of Urban Nature-based Solutions, Guidance Document for Planners, Developers and Developer Agents (2025), the Planning Authority is advised to: • Review opportunity sites with the Local Planning Framework area in the context of SuDS, 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; and • Include the present-day flood risk mapping for Clondalkin as a distinct layer within the Strategic Flood Risk Assessment to demonstrate the current predicted flood risk.
--	---	--

	identifying where integrated and area-based provision of SuDS and GI are appropriate to avoid reliance on individual site solutions. The OPW highlights there are a number of sites where further guidance may be considered, some of these sites are adjoining each other where SDCC could provide guidance.	The Planning Authority is advised to consult with the Office of Public Works regarding this recommendation.' On foot of the OPR observation and the OPW submission, the Council has engaged further with the OPW and has agreed an approach to respond to the issue of representing the present day flood risk mapping within the SFRA. In this regard, the SFRA will be revised to include present day flood risk mapping in addition to the mapping already shown which integrates the high-end climate change scenario. Both of the OPR's observations have been responded to at the beginning of section 2 of this CE Report and the recommendation to both the OPW and OPR is the same. CE Recommendation: To amend the draft SFRA to include present day flood risk mapping as a distinct layer within the document and update associated text accordingly; 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) of the document, 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. The full detail of the wording of the recommended amendment on stormwater management is set out in the response to the OPR.
SD-C367-71 Office of Public Works	SFRA Section 8.2 The OPW state that section 8.2 Review of Opportunity Sites states that ‘Clondalkin benefits from existing defences on the Camac towards the north of the settlement’. The OPW mention there are defences in Gallanstown but these are upstream from Clondalkin and will have no effect on flooding in the area. The areas that benefit from these defences can be viewed in the National CFRAM pdf map. If SDCC know of other defences these should be listed in a register of defences in the SFRA.	CE Response: The submission is noted, and it is considered appropriate to amend the text contained in section 8.2 of the SFRA. CE Recommendation: Amend the text in section 8.2 of the SFRA: From ‘Clondalkin benefits from existing defences on the Camac towards the north of the settlement. Although defended, residual risks to these developments need to be assessed, including defence overtopping and climate change impacts. The Justification Test is

		required for all opportunity sites and areas for potential development within a flood zone, whether located behind defences or not. 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.' To 'The Justification Test is required for all opportunity sites and areas for potential development within a flood zone, whether located behind defences or not. 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.'
--	--	--

Miscellaneous

Miscellaneous		
Submission No.	Submission Summary	CE response and recommendation
SD-C367-159 Monica McGill	Miscellaneous The submission thanks the council for the work in creating the LPF and arranging public consultations. The submission requests that the council should clarify what is 'Clondalkin village' and 'Clondalkin town'. Does the village refer to the central and older parts of Clondalkin, and the town relates to the modern parts which are distant from the village centre. Queries if the council will make these references consistent in the plan. The submission requests that a glossary should be included in the plan. The submission requests that the council should consult with the National Adult Literacy Agency regarding the use of plain English in all public consultation. The submission requests that maps and drawings in the plan be enlarged and label key roads and buildings.	CE Response: The acknowledgement of the work in creating the LPF and arranging public consultations is noted. Clondalkin village is recognised in the County Development Plan as being one of the nine historic villages within the county, and as such, the core area of the village around the 'oval' extending into the areas of Monastery Road adjacent to the village is zoned as a 'Village Centre'. Other areas within the LPF boundary, including the Ninth Lock Framework site and the industrial estates at Oakfield etc., are zoned as 'Town Centre'. It is recognised that the identification of Clondalkin as a village is seen as important by many in the community. The LPF has tried to reflect this insofar as possible. It is considered that the LPF would benefit from a list of acronyms and that this should be inserted into the final document at the start of the document. The importance of documents being accessible to the public and written in plain English and the reference and link to the advice of Council National Adult Literacy Agency is acknowledged. While the LPF was written to reflect as far as possible the need for plain English, there are sometimes

	The submission requests to remove the large uninformative images in the plan to allow more space for clearer maps, drawing and images.	technical references which have to be incorporated into the plan. The LPF has been published as a pdf document which is available online allowing for the ability to zoom in to detail where that is required. However, in printed format it is in A3 as that is considered the largest size that is appropriate for a document of this type. While key roads and some buildings are labelled on some maps, because of the detail contained in other maps it was not possible to include full labelling at all times. The document is constrained as to the size of maps that can be inserted, as noted above it is designed in A3. Removing certain images or maps would not greatly increase the size of the remaining maps. CE Recommendation: To include a list of acronyms in the Final Document prior to the start of the first chapter.
--	---	--