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21st January 2026

**Re: Proposed Material Alterations to Variation 1 of the County Development Plan: Draft
Clondalkin Local Planning Framework**

Dear Sir/Madam,

The National Transport Authority ('NTA') welcomes the opportunity to comment on the proposed Material Alterations to Variation 1 of the County Development Plan: the *Draft Clondalkin Local Planning Framework* ('LPF'). These comments are based on prevailing national policy, the Greater Dublin Area Transport Strategy (hereafter, the Transport Strategy) and the manner in which the NTA would envisage these being implemented at the local level in Clondalkin.

1.0 Material Alterations to the Draft Local Planning Framework

1.1 Clondalkin Local Transport Plan

A Draft Local Transport Plan (LTP) for Clondalkin was published for consultation with the Draft LPF. In its submission on the Draft LPF (dated 29/09/25) the NTA welcomed *'the level of detail included from the LTP and the manner of commitment to the LTPs findings'*. The NTA notes that Material Alterations to the Draft LTP have not been proposed and supports the publication of the LTP with the Final LPF for Clondalkin.

1.2 Chapter 5 – Sustainable Movement

The NTA supports proposed Material Alterations MA4, to insert a new Objective under SM1: Active Travel - Overarching: *'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.'* This addresses points raised in the original NTA submission.

The NTA also refers to proposed MA8 which provides for an additional objective under SM5: Priority, Secondary and Strategic Permeability Routes as follows: *'To hold public consultation and seek agreement with those directly impacted on any future proposed permeability links or estate opening.'* While the NTA fully supports further consultation during scheme or project development, it is considered that it is not always possible to reach agreement with all those directly impacted by such schemes. Furthermore, it is important that the wider impacts of permeability schemes, benefits for the wider area and the potential contribution to the overall pedestrian network are also considered in decision making. As such, it is recommended that the commitment to *'seek agreement with those directly impacted'* should be removed.

In its submission on the Draft Plan the NTA also made additional recommendations, relating to Chapter 5, that do not appear to have been reflected in proposed Material Alterations. The NTA reiterates these recommendations below and feels that they would further strengthen the Plan.

NTA Recommendations

- MA8 should be amended as follows: *'To hold public consultation ~~and seek agreement with those directly impacted~~ on any future proposed permeability links or estate opening.'*
- The NTA reiterates the following recommendations made in its submission on the Draft Plan:
 - 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

1.3 Chapter 8 – Urban Design Strategies

The NTA supports MA25 which proposes to amend Figure 8.32 as *'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 to 'Include the identification of the permeability links, identified as 'n' and 'o' between the Ninth Lock Framework site and the Mill Centre site.'*

Regarding the proposed inclusion of an additional 'Mini-Framework' for the Tower Road/Main Street Junction, the NTA supports the identification and inclusion of future potential permeability routes in this area that are to be considered in any future redevelopment proposals. It is considered that this is important in appropriately supporting accessibility and connectivity for sustainable modes.

1.4 Chapter 9 - Implementation and Monitoring


In its submission on the Draft Plan the NTA welcomed the inclusion of a separate chapter dealing with implementation, evaluation and monitoring. The NTA reiterates its recommendation that the *'Implementation'* Column in Table 9.1 should include specific reference to the LTP.

NTA Recommendation

- The *'Implementation'* Column in Table 9.1 should include specific reference to the LTP.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Clondalkin Local Planning Framework and the Local Transport Plan, and we look forward to continued engagement with the Council during this process.

Yours sincerely,

A large black rectangular box used to redact the signature of Michael Mac Aree.

Michael Mac Aree
Head of Strategic Planning