

Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

Monday, 26th January 2026

To whom it may concern,

RE: SUBMISSION IN RESPECT OF MATERIAL ALTERATION NO. 25 OF THE DRAFT CLONDALKIN LOCAL PLANNING FRAMEWORK RELATING TO VARIATION NO. 1 TO THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

Thornton O'Connor has been retained by ARP 4.3 Sustainable Communities (Ireland) Fund (a sub-fund of Ardstone Partners ICAV)¹ to prepare this Submission to South Dublin County Council in respect of the publication of the *Proposed Material Alterations to Variation No. 1 to the South Dublin County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework* ('Proposed Material Alterations to the Draft Clondalkin LPF').

1.0 INTRODUCTION

On 11th December, a Special Council Meeting was held by the Elected Members of South Dublin County Council to consider the *South Dublin County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework* ('Draft Clondalkin LPF') and the Chief Executive's Report on submissions/observations received. It was resolved at the meeting to alter the Draft Clondalkin LPF and thus the proposed material alterations have been placed on public display from 18th December 2025 until 26th January 2026.

This submission is made in respect of Material Alteration No. 25 ('MA25') pertaining to the Ninth Lock Framework Site, recently purchased by our Client. The area outlined in red in Figure 1.1 overleaf is the extent of land covered by the Ninth Lock Framework Site (as amended under MA25) that is in our Client's ownership.

¹ No. 48 Fitzwilliam Square, Dublin 2

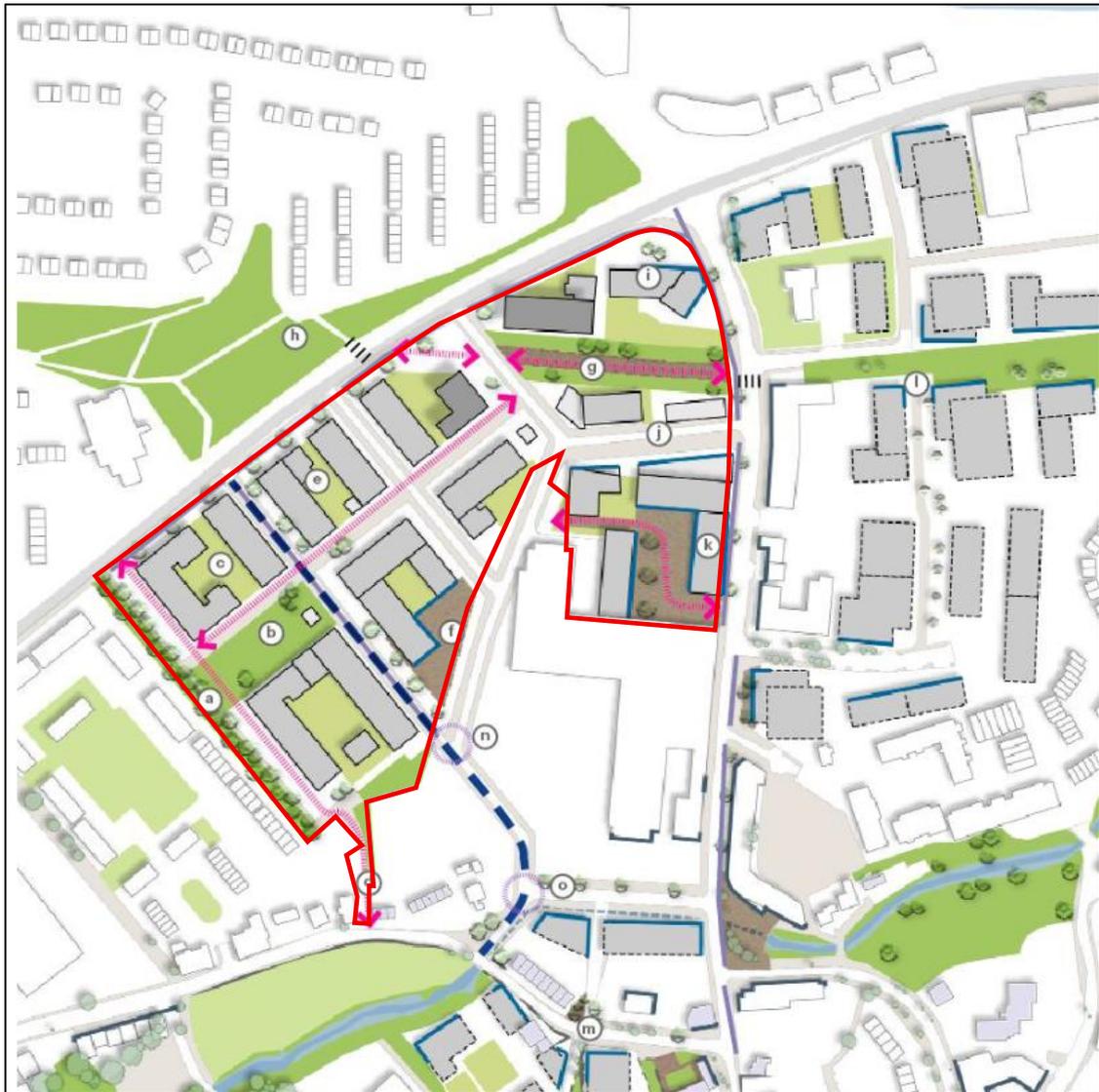


Figure 1.1: Ninth Lock Framework Site (Indicative Layout) with the Extent of Land in the Ownership of our Client Indicatively Outlined in Red

(Source: *Proposed Material Alterations to Variation No. 1 to the South Dublin County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework*, Annotated by Thornton O'Connor Town Planning, 2026)

2.0 MATERIAL ALTERATION NO. 25

The Draft Clondalkin LPF provides a list of development parameters and an indicative layout (Figure 2.1), with an associated key, relating to the Ninth Lock Framework Site.



Figure 2.1: Current Indicative Layout of the Ninth Lock Framework Site

(Source: *Proposed Material Alterations to Variation No. 1 to the South Dublin County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework, Annotated by Thornton O'Connor Town Planning, 2026*)

As part of the Proposed Material Alterations to the Draft Clondalkin LPP, the indicative layout and associated key were altered under MA25. The alterations to the indicative layout and associated key, as illustrated in Figure 2.2, include (a) the removal of any reference to 'vehicle movement', (b) the identification of the long-term high-capacity public transport route through the site, and (c) to include two permeability links between the Ninth Lock Framework Site and the Mill Centre site located to the south-east.

The two new permeability links are noted in the revised key as "n" and "o", with the following explanatory text provided for both:

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

The reason for these changes, as stated in MA25, is to *"illustrate more clearly the long term high capacity public transport reserve, as identified in the adopted County Development Plan."*

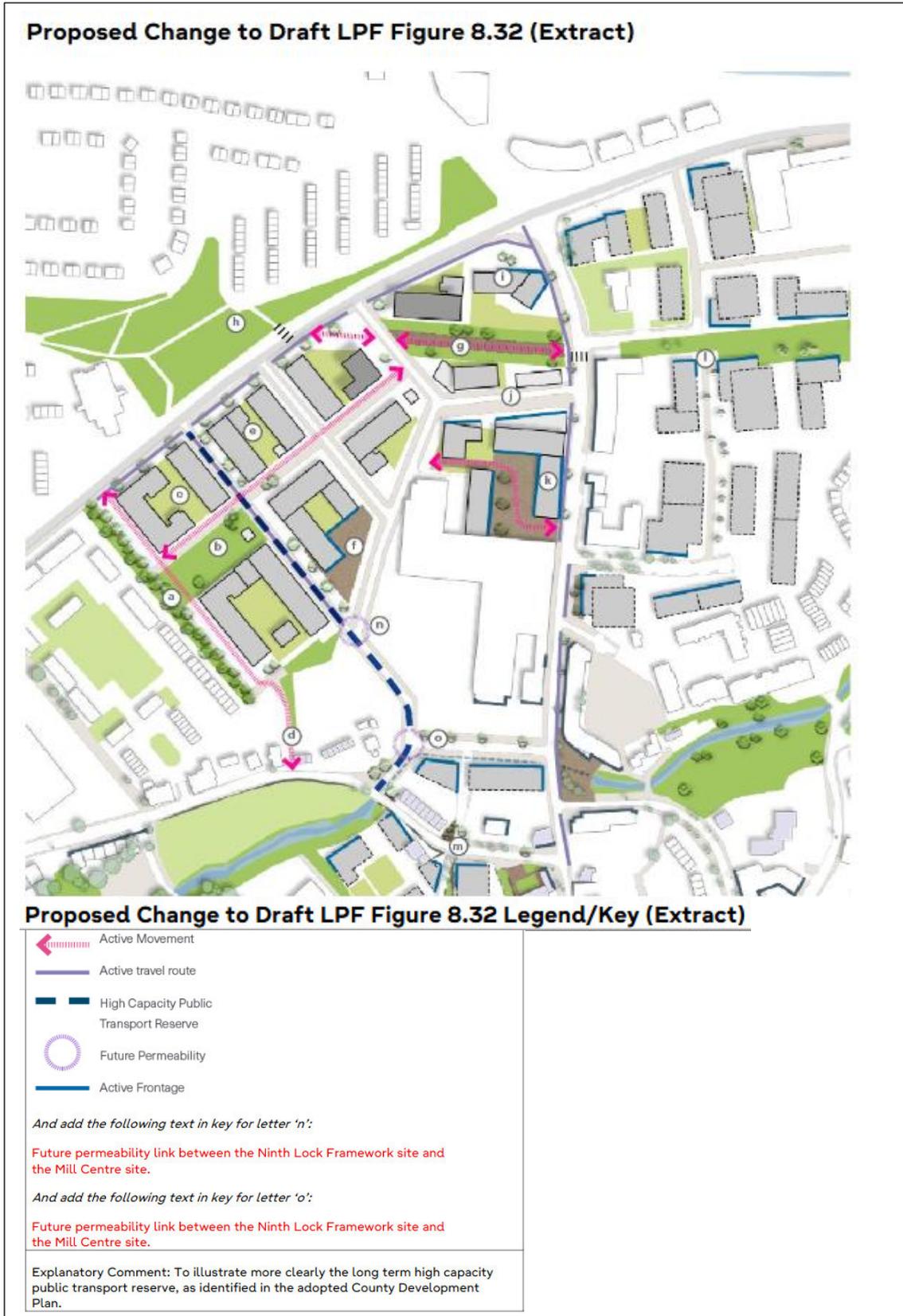


Figure 2.1: Proposed Material Alteration to the Indicative Layout of the Ninth Lock Framework Site

(Source: *Proposed Material Alterations to Variation No. 1 to the South Dublin County Development Plan 2022-2028: Draft Clondalkin Local Planning Framework, Annotated by Thornton O'Connor Town Planning, 2026*)

3.0 PROPOSED AMENDMENTS TO MATERIAL ALTERATION NO. 25

3.1 Indicative Layout & Key

As noted in Section 1.0 above, a large extent of land covered by the Ninth Lock Framework Site is in our Client's ownership. The remaining lands, which are located along Ninth Lock Road, New Nangor Road, Old Nangor Road, Oakfield and part of the Mill Centre site, are outside our Client's ownership. The Ninth Lock Framework Site is subject to a number of design parameters which were altered under MA25, including permeability routes, active movement routes, vehicular connections, etc. As there is no certainty at this stage that adjacent landowners will agree to the inclusion of their land as part of any future development on our Client's land, our Client's ability to deliver a scheme that precisely adheres to the Clondalkin LPF is restricted.

While our Client supports the principle of a comprehensive and strategic approach to the future development on their site, concerns remain regarding the flexibility implied by the layout, key and associated text pertaining to the Ninth Lock Framework Site. Although the text under the map in Figure 8.32 of the Draft Clondalkin LPF states "*Ninth Lock Road Framework Indicative Layout*", it is unclear on the flexibility surrounding the implementation of the text associated with the map.

Therefore, it is requested that the following text be included alongside the layout and key to support the effective delivery of the Ninth Lock Framework Site:

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

We note that the above text is similar to Objective SM5 of the Draft Clondalkin LPF introduced under Material Alteration No. 7 which states:

*"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."* **[Our Emphasis]**

3.2 Movement Strategy

Our Client welcomes the alterations made to the Draft Clondalkin LPF under MA25, however, it is noted that the movement parameters for the site (page 101 of the Draft Clondalkin LPF) have not been updated to reflect the changes listed under MA25. In this regard, to ensure clear and appropriate vehicular movements to the Ninth Lock Framework Site is provided for as part of any future development, it is requested that the following minor changes to the text provided on page 101 of the Draft Clondalkin LPF are made:

Draft Clondalkin LPF:

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

Suggested Amendment:

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

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

4.0 CONCLUSION

As outlined above, while our Client generally welcomes the changes made to the *Draft Clondalkin Local Planning Framework*, concerns remain regarding the degree of certainty implied by the layout, key and associated text pertaining to the Ninth Lock Framework Site, as well as the unaltered parameters relating to vehicular movement at the site. As such, we respectfully submit that the amended text outlined in this submission relating to the layout and parameters of the Ninth Lock Framework Site is reflected in the final publication of the *Clondalkin Local Planning Framework*.

Yours faithfully,



Patricia Thornton
Director
Thornton O'Connor Town Planning