

Principal Planning Officer
South Dublin County Council
County Hall
Tallaght Dublin 24
D24 YNN5

Friday, 21st August 2026
[Via SDCC Public Consultation Portal]

Dear Sir/ Madam,

RE: SUBMISSION TO PROPOSED MATERIAL ALTERATIONS TO PROPOSED VARIATION NO. 3 TO THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN: CITY EDGE STRATEGIC URBAN REGENERATION FRAMEWORK 2026

This submission follows our previous submission made to South Dublin County Council (SDCC) in respect of Proposed Variation No. 3, on behalf of our client, B&G Ltd¹ (SDCC Ref. SD-C418-37). This submission relates to a c. 0.52 ha site known as Wilkins House, Greenhills Industrial Estate, Greenhills Road, Walkinstown, Dublin 12, D12 T2N7. The site, located c. 200m to the south-west of Walkinstown Roundabout, is situated within the proposed Greenhills Priority Development Area (PDA).

In our last submission, we confirmed that a planning application for a mixed use development at the site is currently in the final stages of being prepared, having been discussed at pre-application consultation with SDCC. We raised concerns that the adoption of Variation No.3 in its proposed form has the potential to undermine the feasibility of the proposed scheme from both a planning and viability perspective. Our concerns relate to the introduction of overly prescriptive development standards relating to 'Shop – Neighbourhood' uses, car parking, building heights, plot ratio and also the mapped 'Community Park' and 'Community/Cultural Facility' objectives.

As outlined in our previous submission, the proposed development has been progressing since our client entered into pre-application consultation with SDCC in January 2026. During that process, SDCC confirmed that the principle of development was acceptable and did not raise any fundamental concerns regarding the proposed mix of uses, building heights or parking provision that could not be addressed through design evolution. On that basis, our client mobilised the full design team and continued to progress the scheme towards planning application stage.

Firstly, we wish to acknowledge the positive amendments made through the Proposed Material Alterations following consideration of submissions received during the previous stage of the statutory consultation process. In particular, we consider that the Proposed Material Alterations address a number of the key issues raised in our previous submission in relation to the Greenhills PDA.

¹ Wilkins House, Greenhills Industrial Estate, Walkinstown, Dublin 12. D12 T2N7

In summary, we wish to highlight our support for the following Proposed Material Alterations:

- **Material Alteration MA2.1**, which amends the first Key Principle for Land Use in Section 2.3.2 to provide for higher density urban forms, *"with density increasing in accordance with public transport accessibility"*
- **Material Alteration MA2.21**, which amends Section 2.6.1 of the SURF by deleting the reference to the height threshold of 35m and replacing the wording with:

"In the Greenhills PDA, taller elements may be concentrated along the major route, Calmount Road and the proposed Calmount local centre location."

- **Material Alteration Reference: MA2.22**, which amends Section 2.6.2 of the SURF by included specific text in relation to alignment with the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024), more specifically, the insertion of *"...As such there is a presumption that net residential density in the range of 200-250 dph is achievable at highly accessible locations within the PDAs."*
- **Material Alteration MA2.23**, which amends Figure 9 by inserting the wording *"Indicative Building Heights"* and confirming that the Figure is *"To be read in conjunction with Policy IOD1 Objective 3."*
- **Material Alteration Reference: MA3.7**, which amends the PDA Development Guidance Tables by replacing prescriptive references to minimum requirements with broader targets of the Greenhills PDA.
- The continued identification of the Indicative Community/Cultural Facility Location and Indicative Community Park Location as indicative objectives.

Notwithstanding our support for the Proposed Material Alterations as outlined above, we respectfully request that further consideration be given to the provision of additional flexibility regarding car parking standards for larger convenience retail uses within Local Centres. While supporting the sustainable transport objectives of the SURF, it is important that an appropriate degree of flexibility is maintained during the early phases of development to support the viability and delivery of convenience retail uses serving existing and future communities.

We hope the flexibility allowed for by the SURF is implemented in practice, having regard to the progressed nature of the proposed scheme at Wilkins House, which is due to be lodged with SDCC in the coming weeks. We trust that the above is clear. Please do not hesitate to contact the undersigned for further information.

Yours sincerely,



Linda Colleran
Associate
Tom Phillips + Associates