

Senior Executive Officer,
Delivery Section,
Planning and Transport,
South Dublin County Council,
County Hall, Tallaght,
Dublin 24, D24 A3XC

Date: 29th September 2026

Ref.: 20181/RK/MN

Re: Submission to the Proposed Amendments to the Clonburris Strategic Development Zone Planning Scheme 2019

Dear Sir / Madam,

1.0 INTRODUCTION

On behalf of Cairn Homes Properties Ltd., (“Cairn”) 45 Mespil Place, Dublin 4, we, JSA Planning, 39 Fitzwilliam Place Dublin 2, have been instructed to make a submission to the Proposed Material Amendment to the Clonburris Strategic Development Zone Planning Scheme 2019.

We note that written submissions or observations may be made from Monday 31st August to Tuesday 29th September 2026 inclusive.

Cairn Homes as the largest landowner within the Clonburris SDZ fully support the proposed amendments which will assist in supporting compact growth, effective infrastructure delivery, and sustainable mobility within the Clonburris SDZ.

Since commencing construction in January 2022, Cairn has delivered approximately 1,900 new homes within the SDZ. A further c. 1,200 homes are currently under construction, with an additional c. 2,000 homes in the planning pipeline, demonstrating the significant scale and pace of delivery within the SDZ.

We fully appreciate that the Clonburris SDZ is a key housing delivery site for Dublin and is positively contributing to housing supply rapidly supported by key enabling infrastructure, such as the South Link Street (now complete), along with the North Link Street (permitted), as well as the 3-no. key strategic parks (permitted).

Cairn respectfully requests that **An Coimisiún Pleanála** prioritise the determination of the proposed amendments to facilitate the timely delivery of critical infrastructure, which is directly linked to housing delivery. Cairn is also keen to avail of the **Compact Growth Guidelines**, adopted in 2024, which cannot currently be applied within the SDZ until the proposed amendment has been determined.

2.0 KEY POINTS TO SUBMISSION

Cairn supports the proposed amendments and notes the following:

2.1 **Proposed Amendment no. 2 Amend and relocate a pedestrian bridge over canal**

Our client supports the amendment and relocation of a pedestrian bridge over the Grand Canal from its current location further to the east. The proposed relocation would allow for a better integration into the green link created as a result of the significant Gas Networks Ireland (GNI) high pressure gas main wayleave along the Fonthill Road frontage. The layouts of the permitted developments along the frontage have had to take account of the gas main wayleave which has led to the creation of a significant pedestrian and cyclist green link opportunity along this frontage, not envisaged by the original Clonburris Planning Scheme.

The bridge relocation would also allow for the use of the existing opening onto the Grand Canal towpath. Having regard to the additional green links (along the eastern Fonthill Road frontage – arising from the gas main) and the permitted layouts in the Clonburris Southwest Area which provide a high degree of connectivity which would link into the new proposed location, and the permitted Strategic Parks application, that the proposed relocation of the canal bridge is appropriate and respectfully request that the Coimisiún approves proposed amendment no. 2.

2.2 **Proposed Amendment nos. 3 and 4 - Amend the proposed vehicular bridge over railway to a pedestrian and cycle bridge and associated/consequent amendments**

Cairn fully supports the proposed amendment nos. 3 and 4, which seeks to amend the vehicular bridge over the railway designation to a pedestrian and cycle bridge, alongside updating the adjoining street from a Link Street to a Local Street.

It is noted that the Systra study makes use of a 2035 forecast model that was developed during modelling work previously undertaken in 2018 which also includes the full buildout of the Clonburris development. The assessments by Systra represent a “*worst case assessment*”.

4 no. junctions were assessed, 2 of which (J10 and J11) were noted as “no issues were identified in the Lin Sig modelling. No further mitigation is required.”

Of the remaining 2 junctions, J7 “*the junction is still considered to be operating satisfactorily. No further mitigation is recommended for this junction.*”

With reference to Junction 8, the Systra analysis outlined that the impacts of the road removal may require mitigation to address the impact at this junction which included some localised widening of junction arms, if required.

Having regard to the robust Systra report and the extensive pedestrian and cyclist networks within the SDZ, it is respectfully submitted that the proposal to amend the vehicular

bridge over the railway designation to a pedestrian and cycle bridge is appropriate and will enhance the overall sustainability of the Clonburris SDZ and request that it is approved by An Coimisiún Pleanála.

2.3 Proposed Amendment no. 5 - Replace standalone pedestrian bridge over railway with a pedestrian connection integrated with Clonburris Fonthill Station to enhance urban centre permeability

Our client is fully supportive of the replacement of the standalone pedestrian bridge over the railway line with an integrated and enhanced urban design and permeability solution located at the railway station which will be accommodated within a planning application for the Clonburris Urban Centre (known as Tile 9), which is due to be lodged to SDCC shortly by Cairn.

From a review of the constraints which relate to a significant gas wayleave, Uisce Eireann wayleave, as well as significant telecom/fibre optic infrastructure in the southeastern corner of Tile 9, the optimal solution was to incorporate the pedestrian connection which replaces a more complex standalone bridge with a streamlined, integrated solution that continues to meet the permeability and infrastructure delivery goals of the Planning Scheme while offering improved functionality.

The GNI high pressure wayleave has had an impact on the eastern frontage along the Fonthill Road insofar as the building line has been pulled back, leading to the creation of an additional substantial linear park. The intention is to integrate this linear park into the pedestrian connectivity in an enhanced experience for future residents and visitors, compared to a “*formal*” standard bridge structure.

We note that the NTA have been examining the integration of the railway station at Fonthill. The station building and associated infrastructure were constructed in 2008, based on an operational model where users from both the east and west sides would access the station through separate buildings. The building to the west has never opened, and Irish Rail currently has no plans to do so.

The layout accommodates a high-quality pedestrian link which will integrate into the adjacent Fonthill Road and train station and provide the connectivity in an enhanced link. The emerging opportunity is for the platform (where the station currently exists) to be incorporated into the proposed ‘linear park’ to the southwest (CUCS3 & CSW-S3), with paths, walkways, steps, and ramps extending greenery directly onto the platform.

The park could also be extended northwards to connect with the T9 development, integrating the necessary vertical circulation elements to serve the station.

Noting the above, our client strongly supports proposed amendment no. 5 and respectfully requests that it is approved by ACP.

2.3.1 Proposed Amendment no. 5 - 9 Car parking management – clarify layout and management

Cairn supports the use of clear car parking management plans and has been working with South Dublin County Council in this regard.

2.3.2 Proposed Amendment no. 5 - 11 Home Zones – define design standards distinct from local streets

The proposed amendment introduces a dedicated heading and expanded design guidance for Home Zones / Intimate Local Streets. Our client supports the additional clarity provided and the specification aligns with Cairn's designs to date.

2.4 Proposed Amendment no. 17 – Active Frontages Amend the retail frontage parameters

Our client supports the proposed amendment no. 17 relating to Section 2.4.3 of the Planning Scheme which will allow for the inclusion of residential at ground floor within the Primary Retail Street frontages. Having regard to the extent and size of the central square, it is critical that some residential active use is allowable at ground level as the design stage of the urban centre indicates that even using the full 12,290 sq.m m of retail floorspace, and including employment uses at ground level, that there are still significant frontages with a shortfall of active uses. It is critical that the main urban square of the Clonburris Urban Centre is active throughout the day and evening, and the inclusion of some residential uses at ground floor level will provide that activity across the day and evening, providing activity and vibrancy across the day and night.

It is important that the main urban square of the Clonburris Urban Centre is active throughout the day and evening, and the inclusion of some residential uses at ground floor level will provide that activity across the day and evening, providing activity and vibrancy across the day and night. A strict adherence to the current wording in practical terms would potentially result in levels of vacancy which is not desirable.

Having regard to the above, our client is seeking that the proposed amendment nos. 12 and 17 are approved by An Coimisiún Pleanála.

2.5 Proposed Amendment no. 7 Relocate Park Hub from Gallanstown / Cappagh to Canal Park South

Our client welcomes the proposed Relocation of the Park Hub from Gallanstown / Cappagh to Canal Park South as the permitted Park Hub adjacent to Na Cluainte Park South now fulfils this role.

The permitted Park Hub at Na Cluainte Park South provides enhanced facilities including a sports hall, multi-purpose spaces, changing facilities, a café, and ancillary areas. Given the high level of connectivity between the two locations through the provision of the pedestrian bridge (no. 12), which is due to be lodged to SDCC shortly, it is submitted that it is better to concentrate the facilities in one location rather than diluting the facilities across two locations, which are close in proximity. The concentration into one location will also allow for reduced running costs during the operation phase of the Park Hub.

Cairn agrees with the commentary contained in the Proposed Amendment no. 7 which states that given the scale and function of (the Na Cluainte Park Hub), that *“this planned community infrastructure, the Gallanstown/Cappagh Park Hub is no longer required in that location.”*

We would also highlight that Clonburris Infrastructure Limited are due to lodge an application for changing room facilities, located in the Canal Park South, which will perform an important community function for that location.

Having regard to the above, our client supports fully the approach and the consequent amendments to Table 2.7.1 and respectively requests that An Coimisiún Pleanála approves the proposed amendment no. 7.

2.6 Proposed Amendment 15 Clarify the operation of the roll-over provision for housing delivery between development areas

Proposed Amendment no. 15 seeks to clarify that the phasing ‘roll over’ of up to 250 dwelling units may be constructed and occupied in the following phase, subject to planning permission. It is submitted that the most relevant aspect of the phasing is the occupation of units rather than solely their construction and that this clarification is welcomed by our client.

2.7 Proposed Amendment no. 18 Relocate unused residential units from southern to northern development areas

Our client also supports Proposed Amendment no. 18 which seeks to relocate some 230-no. unused residential units from the southern development areas to the northern development areas. It is submitted that the proposed amendment represents a balanced and policy-aligned reallocation of residential units within the SDZ, optimising housing delivery while remaining within the overall unit cap. It is noted that the southern part of the overall SDZ lands (i.e., between the railway line and the Grand Canal is progressing rapidly and it is evident that there is underutilised capacity in the southern SDZ lands, relating to sites that are either permitted or currently within the planning system.

2.8 Proposed Amendment no. 1 Compact Settlement Guidelines

Our client welcomes the inclusion of the reference to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024), and the consequent amendments to standards. It is submitted that the use of the Compact Settlement Guidelines within the wider parameters of the Planning Scheme will allow for additional flexibility in typologies, and own door housing, while also providing sustainable densities and meeting the key objectives of the Planning Scheme.

2.9 Proposed Amendment no. 8 Amend the Electric Vehicle charging requirements

Our client supports the proposed amendment no. 8 which seeks that EV charging requirements are amended in order to provide an ability to determine the initial provision of charging points on a case-by-case basis. It is submitted that a more flexible approach is appropriate which will allow for the relevant standards to be provided aligned with the provisions of the relevant South Dublin County Council Development Plan.

2.10 Proposed Amendment no. 13 Allow limited flexibility in urban design parameters to address immovable site constraints

Our client fully supports the inclusion of additional text in section 2.8. *“Built Form and Design under 2.8.1”* to allow for defined and limited flexibility in applying urban design parameters where delivery is constrained by existing immovable infrastructure.

For example, there is an existing legal wayleave facilitating GNI High Pressure gas main and Uisce Eireann water mains along the eastern boundary which requires a minimum 20 metre setback. We also note that there is a critical fibre optic telecommunications infrastructure along the eastern frontage along the Fonthill Road.

The effect of these immovable site constraints is that in specific locations, the delivery of key infrastructure and housing must respond to the fixed elements of the Planning Scheme. Cairn in conjunction with various design teams in consultation with SDCC has responded to these immovable constraints in respect of applications adjacent to the Fonthill Road, which in turn has allowed the creation of a significant north south public open space and associated cycle/pedestrian route which will ultimately run from Thomas Omer Way in the north to the Grand Canal towpath and Grand Canal Greenway to the south.

Furthermore, this now key north south pedestrian and cyclist link will integrate with the Clonburris Urban Centre and Fonthill railway station as well as the east west strategic green link along the railway line increasing permeability and integration throughout the Planning Scheme.

Having regard to the above, our client is seeking that ACP approves proposed amendment no. 13.

2.11 Proposed Amendment no. 19 (Allow rooftop telecommunications) and PMA 20 (Update associated figures, references, outdated guidance, and correct minor typographical errors)

Our client supports the proposed amendments 19 and 20 which are considered to be consistent with the overall intent of the Planning Scheme and relatively minor in nature.

3.0 CONCLUSIONS

We would respectfully request that An Coimisiún Pleanála takes into consideration this submission and makes a determination to approve the proposed amendments at the earliest convenience.

Yours sincerely,



Rory Kunz, Executive Director JSA Planning