

South Dublin County Development Plan 2022-2028
Proposed Variation No 3

City Edge Strategic Urban Regeneration Framework 2026

Chief Executive's Report
June 2026

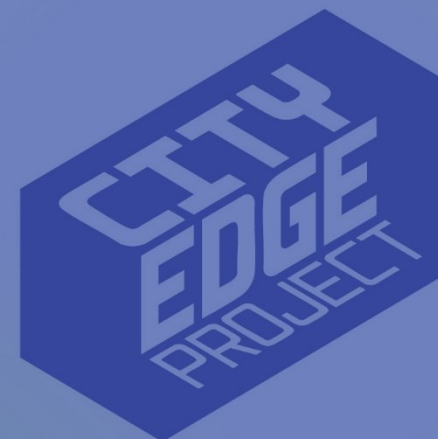


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Abbreviations

AA – Appropriate Assessment

CDP – County Development Plan

DECLG – Department of Environment, Community and Local Government.

GDATS – Greater Dublin Area Transport Strategy

MASP – Metropolitan Area Strategic Plan

NIR – Natura Impact Report

NPF – National Planning Framework

NSO – National Strategic Outcomes

NTA – National Transport Authority

OPR – Office of the Planning Regulator

OPW – Office of Public Works

PDA – Priority Development Area

RSES – Regional Spatial and Economic Strategy

RSO – Regional Strategic Outcomes

SDCC – South Dublin County Council

SEA – Strategic Environmental Assessment

SFRA – Strategic Flood Risk Assessment

SuDS – Sustainable Drainage System

SURF – Strategic Urban Regeneration Framework

TII – Transport Infrastructure Ireland

UDZ – Urban Development Zone

Section 1: Introduction

1.1 Overview

This Chief Executive's report relates to the issues raised in submissions and observations received from members of the public, prescribed bodies and other stakeholders following the publication of the Proposed Variation No.3 to the South Dublin County Development Plan 2022-2028 which comprises the Draft City Edge Strategic Urban Regeneration Framework (SURF). The process of preparing the Variation to the Development Plan has been undertaken pursuant to Section 58 of the Planning and Development Act, 2024 (as amended).

Proposed Variation No.3 to the South Dublin County Development Plan 2022-2028 fulfils Policy CS2 of the South Dublin County Development Plan 2022-2028 to 'deliver a framework for the regeneration of the City Edge lands...' (see policy and objectives below). This SURF will be incorporated as an appendix to the County Development Plan 2022-2028 and will inform proposals and decisions on future development within the South Dublin City Council (SDCC) part of the City Edge area including the three identified Priority Development Areas (PDAs) of Red Cow & Cherry Orchard, Long Mile and Greenhills.

Policy CS2: City Edge Regeneration Lands
Deliver a development framework for the regeneration of the City Edge lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy.
CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road / Ballymount as defined by the City Edge project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased

development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The City Edge Strategic Framework will inform this Statutory Plan.

CS2 Objective 2:

To facilitate a co-ordinated approach and vision to any future sustainable development of the City Edge area in collaboration with Dublin City Council and all relevant stakeholders, including the local community and existing businesses having regard to their operational needs, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.

The City Edge Strategic Framework (2022), prepared by project partners SDCC and Dublin City Council (DCC), is a high-level vision and long-term delivery strategy for regeneration of the City Edge lands to 2070. This SURF gives a statutory basis to, and refines the Strategic Framework (2022) for City Edge lands within the SDCC jurisdiction, over a short to medium timeframe. It is proposed to seek candidate UDZ designation for the SDCC part of City Edge following the adoption of the Draft SURF, given its objective to deliver transport-oriented development and compact growth on brownfield land in a plan-led manner. It should be noted that at the time of writing the Draft SURF the relevant sections of the Act had not commenced and therefore candidate UDZ / UDZ status cannot currently be sought. The proposed Variation comprises the following documents including environmental assessments:

- Proposed Variation No. 3 to County Development Plan 2022-2028, “City Edge Strategic Urban Regeneration Framework 2026”
- A Strategic Environmental Assessment (SEA) screening determination (prepared under P&D (SEA) Regulations 2004 Sl. 436/2004) and SEA Report pursuant to the European Strategic Environmental Assessment Directive

(2001/42/EC) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended) (Sl.456 of 2025);

- An Appropriate Assessment (AA) screening determination and Appropriate Assessment Stage 2 Report (Natura Impact Report) – pursuant to Article 6(3) of the European Habitats Directive (92/43/EEC);
- A Strategic Flood Risk Assessment, in accordance with the relevant Section 28 Guidelines;
- Appendix 1 to City Edge Strategic Urban Regeneration Framework (SURF): Proposed Changes to the Written Statement of the South Dublin County Development Plan 2022-2028 (and Associated Appendices).
- The Proposed Variation is informed by a City Edge SURF 2042 Transport Modelling Report (2026) (this is not part of the Proposed Variation but was included for information purposes).

1.2 Public Consultation

In the interests of engaging with stakeholders to inform the Draft City Edge Strategic Urban Regeneration Framework (SURF), and in accordance with the requirements of S58 of the Planning and Development Act, 2024 (Variation of Development Plan), South Dublin County Council carried out public consultation over a four-week period from 13th April to 12th May 2026 inclusive. Submissions could be made online via the Council's consultation portal or by post to a dedicated address.

The public consultation campaign involved the following elements:

- Notices were placed in the Irish Times on Monday 13th April 2026 and the Echo on Thursday 16th April 2026 and letters of notification along with copies of the proposed Variation (draft SURF) were sent to the Minister and prescribed bodies, as specified in the Act.

- Information and the facility to make a submission or observation were available via the City Edge website and the SDCC website, both linking to the SDCC Consultation Portal, which was open during the four-week consultation period (see links below):
 - [Notice Proposed Variation No. 3, To The County Development Plan: City Edge Strategic Urban Regeneration Framework 2026 | South Dublin County Council's Online Consultation Portal](#)
 - [The City Edge Project | A Transformative Initiative for Dublin City](#)
- Social media releases were issued by the SDCC Communications Unit across Facebook, Instagram and LinkedIn. A total of six posts were made on the platforms (on 8th, 13th, 20th and 27th April and 5th and 11th May 2026) announcing the opening of the online consultation portal, outlining details of public consultation sessions, highlighting different aspects of the SURF and containing reminders regarding the closing date for submissions.
- Four public consultation drop-in sessions (two afternoon and two evening) were held in two separate venues as set out below:

The Red Cow Inn, Red Cow	Tuesday 21 st April, 14:30-16:00
	Tuesday 21 st April, 18:00 – 20:00
The Cherry Tree Pub, Walkinstown	Thursday 23 rd April, 14:30-16:00
	Thursday 23 rd April, 18:00 – 20:00

- Information boards were set up at the venues and staff were available to explain the draft SURF, answer questions and encourage interested individuals to make submissions. A total of 47 people attended the sessions.
- The Council hosted a Members' Briefing on the proposed Variation on Thursday, 9th April 2026, from 15:00 to 17:00. During the briefing, Members were given an overview of the Draft SURF and questions were invited.
- An in-person briefing for members of IBEC (the Irish Business and Employers' Confederation) and South Dublin Chamber of Commerce was held in the Council Chamber of South Dublin County Council on 7 May 2026, from 10:00 to 11:30. Over 30 people attended representing 22 businesses and bodies.
- Advertisements were placed on three bus stops adjacent to the Red Cow Hotel, Greenhills Community College and Walkinstown roundabout, and at the Kylemore Luas stop, highlighting the City Edge project, publicising the drop-in sessions and inviting submissions.
- A total of 40 submissions were received during the four-week consultation period.

Of the 40 submissions received, 30 were from organisations while 10 were from individuals. Of the 30 submissions from organisations, 17 were from state bodies including prescribed bodies and infrastructure and service providers while 13 were from private organisations.

The 40 submissions referred to a wide variety of issues with the topic most frequently raised being support for the SURF (24 instances). Other themes referred to on five or more occasions were



Figure 1: Breakdown of submissions received.

community facilities (16 instances), movement (including public transport, walking and cycling) (11), employment (10), phasing and implementation (10), housing (7), natural infrastructure and open space (6), sports and recreation (6) and climate action (5). The breakdown of themes raised in submissions is illustrated in the pie chart below.



Figure 2: City Edge SURF Public Consultation Summary



Figure 3: Images of the drop-in sessions and the advertisements at bus and Luas stops.

1.3 Purpose of the Chief Executive's Report and Process

This report is submitted to the Members of South Dublin County Council for their consideration as part of the process for the preparation of proposed Variation No.3 to the County Development Plan 2022-2028.

This Chief Executive's Report forms part of the statutory procedure for the preparation of a Variation, as required by Section 58 (11) of the Planning and Development Act, 2024 (as amended). As required by the Act, the report:

- Lists the persons who made submissions or observations;
- Summarises the recommendations and submissions made by the Office of the Planning Regulator (OPR), and the submissions made by the National Transport Authority (NTA), the Eastern and Midland Regional Assembly (EMRA). [It is noted that no submission was made by the Minister];
- Summarises the submissions made by any other persons, and where considered appropriate, groups and summarises the issues raised in submissions on a thematic basis;
- Contains the Chief Executive's response to the issues raised, which as required by section 58(c)(iii), takes account of the proper planning and sustainable development of the area, the statutory obligations of the planning authority and any relevant policies or objectives for the time being of the Government, or of any Minister of the Government;
- Sets out the recommendations of the Chief Executive as to how any recommendations made by the Office of the Planning Regulator in their submission should be dealt with (noting that there was no submission to the proposed Variation from the Minister for the Chief Executive to make recommendation on); and
- Where required, includes the assessment of the Chief Executive of the proposed Variation for the purposes of strategic environmental assessment or appropriate assessment, with consideration of the submissions received.

In accordance with Section 58 (12) of the Planning and Development Act, 2024 (as amended) the Elected Members consider the proposed Variation and the report of the Chief Executive.

Following this, if it is in the opinion of the Elected Members that the proposed Variation should be made, it is made by resolution.

If it appears that a modified version of the proposed Variation should be made, this is also done by resolution. Where the modified version constitutes a material alteration of the proposed Variation, the Variation shall be deemed not to have been made, and the planning authority shall publish notice of the material alterations and publish them for public consultation for not less than 4 weeks. Prior to public consultation, determinations are required for any material alterations as to the need for a strategic environmental assessment or an appropriate assessment.

A further CE Report on the submissions received on the material amendments will be submitted to the Members for their consideration. The Members consider this in conjunction with the modifications. At this stage there are three potential resolutions; they make the variation as originally proposed by the planning authority, they make the variation with the material amendments, or they refuse to make the variation.

If in making the proposed variation or a modified version of the proposed variation, the Members of the authority do not comply with any recommendation made by the Minister or Office of the Planning Regulator, they must, as soon as practicable following the making of the variation, inform the Minister, or the Office of the Planning Regulator, as the case may be, by notice in writing. The notice must contain a statement of the reasons for the decision not to comply with the recommendation concerned.

Section 15 of Climate Action and Low Carbon Development Act 2015 includes duties of certain bodies. It is stated that a relevant body shall, in so far as practicable, perform its functions in a manner consistent with— (a) the most recent approved national mitigation plan, (b) the most recent approved national adaptation framework and approved sectoral adaptation plans, (c) the furtherance of the national transition objective, and (d) the objective of mitigating greenhouse

gas emissions and adapting to the effects of climate change in the State. These relevant bodies include local authorities.

1.4 Structure of the Chief Executive's Report

The structure of the Chief Executive's Report is as follows:

Section 1: Introduction

Contains overview and description of public consultation, describes purpose, structure and navigation of report and lists submissions received.

Section 2: Summary of Proposed Amendments and Proposed Chief Executive's Amendments

Contains summary of all proposed amendments arising from submissions from Prescribed Bodies, groups and individuals; and the Chief Executive's own proposed amendments.

Section 3: Specified Prescribed Bodies - Summaries of Submissions, Recommendations and Response of Chief Executive

As per Section 11c of the Act, contains summaries and responses to submissions and recommendations from the Office of the Planning Regulator, and summaries and responses to submissions from the National Transport Authority and the Eastern and Midland Regional Assembly.

Section 4: General Submission Summaries and Chief Executive Responses and Recommendations

Contains summaries of issues raised by the submissions under different themes, sets out the responses and recommendations of the Chief Executive on the issues raised and provides links to the relevant submissions.

Section 5: Proposed Amendments to Maps

Outlines Chief Executive's proposed amendments to Maps and are organised as they appear in the summary tables below.

1.5 Navigating the Chief Executive's Report

In this Chief Executive's Report, submissions have generally been grouped and summarised by theme followed by the Chief Executive's response and recommendation.

Access to each submission in full is available through the relevant hyperlinks in this report where they relate to each summary section and through the list of submissions included at Section 1.8 below. Hyperlinked text is identifiable by an orange underline. Owing to the wide array of themes found within individual submissions, submissions have been generally summarised by theme and responded to in this manner. They are listed under each theme heading by way of three columns. The first column outlines the submission URN containing observations pertaining to the theme heading, the second column outlines the summarised points, followed by the CE Response and Recommendation. Where appropriate, any relevant maps to identify the lands concerned, or as subject of the submission itself, will be included. Where there are overlaps, e.g. where a theme has been responded to under another heading, that heading will be referred to in the response as a point of reference.

1.6 How to Read the Chief Executive's Recommendations

In response to submissions received, the Chief Executive may recommend some changes to the text of the draft SURF or changes to the documents accompanying Proposed Variation No. 3. There are also some changes proposed by the Chief Executive responding to a general review of the Draft SURF document. Furthermore, some minor changes relating to City Edge are also proposed to the Development Plan Written Statement text. The existing text of the Draft SURF or Development Plan Written Statement is shown in black; the proposed deletions in ~~red strikethrough~~; and proposed amendments or new text *in bold, italic green*.

1.7 Minor Amendments not contained in the CE Report

There are likely to be instances where other minor changes are necessary that are not highlighted in this document. These changes will be made when the final version of the document is published. Such changes include:

- Correction of any typographical errors (including punctuation, grammar and spelling).
- Any changes in layout and / or style required for the purposes of clarity e.g. some headings to be made larger or put in different colour text.
- Further changes arising as a consequence of amendments set out in the CE Report – these changes will be made to ensure consistency across the document e.g. A proposed map change may be identified in the CE Report for one map, but may apply to several maps. In such cases, the analogous changes will be made in the other maps.
- Minor changes to text, for the purposes of clarity and consistency.
- Minor changes to maps including legends, for the purposes of clarity and consistency.
- Minor change to numerical figures due to discrepancies as a result of rounding up or down, etc.

It should be noted that these changes do not in any way change the sense of the document.

1.8 List of Submission Received

List of Submissions Received		
Submission URN	Submission Author	Individual / Organisation
<u>SD-C418-1</u>	David Barton	Individual
<u>SD-C418-2</u>	Seamus Reilly	Individual
<u>SD-C418-3</u>	Patrick Butler	Individual
<u>SD-C418-4</u>	The Maritime Area Regulatory Authority (MARA)	Organisation
<u>SD-C418-5</u>	Panda	Organisation
<u>SD-C418-6</u>	John Sheils	Individual
<u>SD-C418-7</u>	Department of Transport	Organisation
<u>SD-C418-8</u>	Transport Infrastructure Ireland	Organisation
<u>SD-C418-9</u>	Dara Magee	Individual
<u>SD-C418-10</u>	EPA	Organisation
<u>SD-C418-11</u>	An Post	Organisation
<u>SD-C418-12</u>	Cian McGuire	Individual

<u>SD-C418-13</u>	Eastern and Midland Regional Assembly	Organisation
<u>SD-C418-14</u>	Massey Bros Funerals	Organisation
<u>SD-C418-15</u>	Action Community and Enterprise CLG	Organisation
<u>SD-C418-16</u>	Greenogue Management	Organisation
<u>SD-C418-17</u>	Inland Fisheries Ireland	Organisation
<u>SD-C418-18</u>	Basketball Ireland	Organisation
<u>SD-C418-19</u>	Reddy Architecture + Urbanism	Organisation
<u>SD-C418-20</u>	Mashup Property Limited	Organisation
<u>SD-C418-21</u>	Uisce Eireann	Organisation
<u>SD-C418-22</u>	Dublin City Council	Organisation
<u>SD-C418-23</u>	Stephen Little and Associates	Individual
<u>SD-C418-24</u>	Proinsias Mac Fhlannchadha	Individual
<u>SD-C418-25</u>	Oversite Property Consultants	Organisation
<u>SD-C418-26</u>	Office of Public Works	Organisation
<u>SD-C418-27</u>	Greyhound Recycling	Organisation

<u>SD-C418-28</u>	National Transport Authority	Organisation
<u>SD-C418-29</u>	Guestford Limited	Organisation
<u>SD-C418-30</u>	C. Duffy Properties	Organisation
<u>SD-C418-31</u>	Development Applications Unit	Organisation
<u>SD-C418-32</u>	Department of Education and Youth	Organisation
<u>SD-C418-33</u>	The Land Development Agency (LDA)	Organisation
<u>SD-C418-34</u>	JSA Planning on behalf of Park Developments	Organisation
<u>SD-C418-35</u>	Electricity Supply Board	Organisation
<u>SD-C418-36</u>	Office of the Planning Regulator	Organisation
<u>SD-C418-37</u>	B&G Ltd	Organisation
<u>SD-C418-38</u>	Savills	Organisation
<u>SD-C418-39</u>	Anto Mar	Individual
<u>SD-C418-40</u>	Michael O'Reilly	Individual

Section 2: Summary of Proposed Amendments and Proposed Chief Executive's Amendments

Summary of Proposed Amendments arising from Prescribed Bodies and Public Submissions by Theme		
Theme	Location in SURF	Details
Office of the Public Regulator	Table 2 (p.34)	Include the following note under Table 2 PDA summary table: <i>Note: While the identified PDAs have the capacity to deliver in excess of 9,084 units the development of these areas will be subject to monitoring of population and housing targets in accordance with the South Dublin County Development Plan Core Strategy and Policy CS3 which seeks to promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County.</i>
	Section 2.6.2 (p.63)	Amend the heading and text within Section 2.6.2 of the SURF as follows: From: 2.6.2 PLOT RATIO The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities define plot ratio as follows: 'Expresses the proportionate relationship between the area of a site and the total gross floor area of a building(s). It is a measure of the intensity of land use and is calculated by dividing

		<i>the gross floor area of a building(s) (sum of floorspace within the external walls of the building) by the site area.'</i> The Guidelines state that dwellings per hectare (dph) <i>'will continue to be the primary measure for residential density'</i> but that in the case of mixed-use, commercial and employment areas, <i>'plot ratio and site coverage standards may also need to be considered in order to manage the scale and massing of development'</i>. To: 2.6.2 <i>DENSITY</i> and PLOT RATIO <i>The provisions of the County Development Plan in particular Variation no. 2 to the County Development Plan table 5.1, set out appropriate density ranges in line with the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024). The lands within the City Edge SURF are identified as being located within the category 'City – Urban Neighbourhoods' where a density range of 50-250 dwellings per hectare will generally be applied. As per the provisions of the Guidelines, further refinement of densities will be carried out on a plan led basis based on considerations of centrality and accessibility to services and public transport, character, amenity and the natural environment. The provision of transport interchanges, the proposed DART + South-West, BusConnects and future potential LUAS lines will support a compact form of development. 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.</i> The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities define plot ratio as follows: <i>'Expresses the proportionate relationship between the area of a site and the total gross floor area of a</i>
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		<i>building(s). It is a measure of the intensity of land use and is calculated by dividing the gross floor area of a building(s) (sum of floorspace within the external walls of the building) by the site area.'</i> The Guidelines state that dwellings per hectare (dph) '<i>will continue to be the primary measure for residential density</i>' but that in the case of mixed-use, commercial and employment areas, '<i>plot ratio and site coverage standards may also need to be considered in order to manage the scale and massing of development</i>'.
	SWRM2 Objective 1 (p.101)	Amend Policy SWRM2 Objective 1 as follows: From: Ensure that all proposed developments take into account the recommendations of the SDCC City Edge Strategic Flood Risk Assessment and where appropriate are accompanied by an individual site level Flood Risk Assessment. To: <i>Ensure that all proposed developments take into account the following:</i> - <i>The recommendations of the SDCC City Edge Strategic Flood Risk Assessment,</i> - <i>The vulnerability classification of proposed land uses as set out in Table 3.1 of The Planning System and Flood Risk Management Guidelines for Planning Authorities (OPW/DEHLG, 2009)</i>

		- <i>The requirements of DECLG Circular P12/2014</i> - <i>The requirements of the EU Flood Directive and</i> - <i>The flood protection provisions which will come forward from the Camac Flood Alleviation Scheme,</i> and where appropriate are accompanied by an individual site-level Flood Risk Assessment.
	Figure 25 (p.141) Figure 5-2 of the SFRA (p.30)	Amend all relevant maps/figures relating to the Red Cow & Cherry Orchard PDA to relocate the indicative school site outside of the flood zone as shown on Figure 25 of the SURF and Figure 5-2 of the City Edge SURF – Strategic Flood Risk Assessment. Refer to Section 5: Proposed Amendments to Maps below, which outlines the revised maps/figures and associated details.
	Section 4.4 (p. 204)	Insert a new section in Chapter 4 of the SURF - 4.4 MONITORING and move the existing section 4.4 FUNDING to section 4.5: Insert the following text under section 4.4: MONITORING <i>The objectives outlined in the City Edge SURF are designed insofar as possible having regard to their subject matter, to be specific, measurable, achievable, and realistic, as per section 12.12.5 of the SDCC County Development Plan.</i>

		<i>The Planning Section of South Dublin County Council will progress the monitoring and implementation of the SURF, primarily through its development management functions and the various phasing thresholds set out in section 4.1 Overall Phasing Strategy and 4.2 PDA Phasing of the SURF. However, it is essential to acknowledge that the SURF also necessitates coordination across various directorates and departments, including those within South Dublin and bodies outside it, to ensure a cohesive approach to development and policy delivery.</i> <i>Furthermore, the SURF will be subject to regular review and reassessment, particularly in response to changes in legislation, new guidelines, or emerging circumstances. This process will evaluate progress, identify areas where adjustments are necessary, and determine whether amendments or variations to the SURF are required to better serve the evolving needs of the community and align with strategic objectives.</i>
National Transportation Authority	Figure 5 (p.42)	Amend Figures 5 and 6 to make street names more prominent and to improve the differentiation between colours used across the respective legends.
	Figure 6 (p.44)	Refer to Section 5: Proposed Amendments to Maps below, which outlines the revised maps/figures and associated details.
	Section 2.3.2 (p.28)	Amendment to Section 2.3.2 (P.28) to include the following text in the first Key Principle for Land use: From:

		To provide for new mixed use residential and employment communities, through sustainable higher density urban forms, served by high quality public transport and active travel links. To: To provide for new mixed use residential and employment communities, through sustainable higher density urban forms, served by high quality public transport and active travel links <i>with density increasing in accordance with public transport accessibility.</i> See also amendment to section 2.6.2 DENSITY AND PLOT RATIO in response to the OPR's submission.
	Figure 7 (p.45) Figure 8 (p.53)	Amendment to Figures 7 and 8 to depict a Mobility Hub Type 3 at the intersection of Oak Road and Naas Road and to indicate the proposed DART SW+. Refer to <i>Section 5: Proposed Amendments to Maps</i> below, which outlines the revised maps/figures and associated details.
	Section 2.5.4 (p.46)	Amendment to Section "Other Public Transport Proposals" (p.46) as follows: From: The City Edge Strategic Framework (2022) proposed two orbital public transport routes that are not contained within the GDA Transport Strategy. To:

		The City Edge Strategic Framework (2022) proposed two orbital public transport routes that are not contained <i>provided for but not identified</i> within the GDA Transport Strategy.
	Policy MOV2 (p.48)	Amendment to Policy MOV2: Public Transport (p.48) as follows: From: To continue to work with the NTA and TII to facilitate the delivery of public transport projects with the goal of providing sufficient capacity in a phased manner to support development of the City Edge Priority Development Areas. To: To continue to work with the NTA and TII to facilitate the delivery of public transport projects, <i>and to ensure alignment with evolving national and regional transport strategies</i>, with the goal of providing sufficient capacity in a phased manner to support development of the City Edge Priority Development Areas.
	MOV2 Objective 2 (p.48)	Amendment to MOV2 Objective 2 as follows: From: To engage with the NTA and TII regarding implementation of BusConnects schemes within the City Edge area including agreement on public realm design including provision for pedestrians and cyclists, greening and SuDS, and design of the cycle bridge at the Naas Road/Long Mile Road/Nangor Road Junction To:

		To engage with the NTA and TII regarding <i>to support and facilitate the</i> implementation of BusConnects schemes within the City Edge area including agreement on public realm design including provision for pedestrians and cyclists, greening and SuDS, and design of the cycle bridge at the Naas Road/Long Mile Road/Nangor Road Junction.
	Table 3 (p.51)	Amendment to Table 3: Mobility Hub Components and Realm Improvements by removing the word “Tram”.
	MOV4 Objective 1 (p.54)	An amendment to MOV4 Objective 1 as follows: From: To require the provision of resident, employee and visitor cycle parking on site, unless the developer / applicant can demonstrate that cycle parking can be provided for in whole or in part in a shared parking building. To: To require the provision of resident, employee and visitor cycle parking on site. unless the developer / applicant can demonstrate that cycle parking can be provided for in whole or in part in a shared parking building.
	Section 2.5.7 (p.54)	Amendment to the first bullet point in the green box headed “Implementation of Cycle Parking” to include the following text: From:

		Cycle Parking will be provided in line with the CDP standard, with reference to the Planning Design Standards for Apartments, Guidelines for Planning Authorities, 2025 (or any superseding document). To: Cycle Parking will be provided in line with the CDP standard, with reference to the Planning Design Standards for Apartments, Guidelines for Planning Authorities, 2025, <i>in accordance with the Cycle Design Manual, or any superseding documents.</i>
	Section 2.5.7 (p.54)	Removal of the second bullet point in the green box headed “Implementation of Cycle Parking” as follows: From: Where there is existing capacity in a nearby shared parking building, a lower level may be provided on site, if it can be demonstrated that the required standard is still met. To: Where there is existing capacity in a nearby shared parking building, a lower level may be provided on site, if it can be demonstrated that the required standard is still met.
	Section 2.5.7 (p.54)	Amendment to the third bullet point in the green box headed “Implementation of Cycle Parking” to include the following text:

		From: Parking facilities will include provision for personal mobility devices such as e-scooters. To: Parking facilities will include provision for personal mobility devices such as e-scooters <i>and a range of cycle types including cargo and accessible bikes.</i>
	Section 2.5.7.2 (p.54 – 55)	Minor amendment to Section 2.5.7.2 Car Parking to include the following text: From: An alternative parking model is proposed for City Edge which facilitates the parking needs of residents (and other users) in collective multi-use parking buildings rather than individual parking areas situated under each apartment development. These buildings are referred to as 'shared parking buildings'. They will be designed with future re-purposing in mind, when enhanced public transport is delivered, reducing the need for private transport. To: An alternative parking model is proposed for City Edge which facilitates the parking needs of residents (and other users) in collective multi-use parking buildings rather than individual parking areas situated under each apartment development. These buildings are referred to as 'shared parking buildings'. They will be designed with future re-purposing in mind <i>(provided that there is no net</i>

		<i>loss of cycle parking facilities</i>), when enhanced public transport is delivered, reducing the need for private transport.
	Section 3.3.5 (p.134)	Amendment to the last bullet point in the purple box headed Red Cow & Cherry Orchard PDA: Land-Use Strategy and Aspirations as follows: From: Provide a cycle crossing at the Naas Road/Long Mile Road/Nangor Road junction that sets a design standard as a flagship piece of infrastructure for the City Edge area. To: Provide a cycle crossing at the Naas Road/Long Mile Road/Nangor Road junction that sets a design standard as a flagship piece of infrastructure for the City Edge area, <i>ensuring consistency with permitted and proposed infrastructure schemes</i>.
	Figure 22 (p.137)	Amendment to Figure 22 that illustrates the location of the proposed cycle crossing at the Naas Road/Long Mile Road/ Nangor Road junction and the proposed Naas Road Crossing. Refer to <i>Section 5: Proposed Amendments to Maps</i> below, which outlines the revised maps/figures and associated details.
	Table 20 (p.180)	Amendment to Table 20 to address a typographical error as follows: From:

		Occupation of further 2,400 units shall be subject to agreement and based on the timeline for the delivery and operation of the Bus Connects Route. Total 2,600 Units. To: Occupation of further 2,400 units shall be subject to agreement and based on the timeline for the delivery and operation of the Bus Connects Route. Total 2,600 Units. <i>Total 3,625 Units.</i>
Movement	Figure 5 (p.42); Figure 21 (p.136)	Amendment to Figures 5 and 21 and their respective legends and any resultant maps/figures to correctly illustrate the classification of roads. Refer to <i>Section 5: Proposed Amendments to Maps</i> below, which outlines the revised maps/figures and associated details.
Building Height	Figure 9 (p.64)	Amend legend for Figure 9 on page 64 by inserting the wording '<i>Indicative Building Heights</i>'.
		Insert text below legend for Figure 9 on page 64 '<i>To be read in conjunction with Policy IOD1 Objective 3.</i>'
	2 nd Para, Line 1, (p. 63)	Delete reference to 35m in first line of second paragraph on page 63 as follows: From:

		In the Greenhills PDA, taller elements of up to 35m are concentrated along the major route, Calmount Road and the proposed Calmount local centre location. To: In the Greenhills PDA, taller elements of up to 35m are <i>may be</i> concentrated along the major route, Calmount Road and the proposed Calmount local centre location'.
Schools and Community Facilities	SCCA1 Objective 1 (p. 71)	Amend Policy SCCA1 Objective 1 as follows: From: To continue to engage with the Department of Education and Youth regarding schools need, while actively monitoring planning applications, construction activity and population growth in the area, and taking into account latent capacity in existing schools in the wider area. To: To continue to engage with the Department of Education and Youth regarding schools need, while actively monitoring planning applications, construction activity and population growth in the area, and taking into account latent capacity in existing schools in the wider area <i>and special education needs requirements'.</i>

	Policy SCCA1 (p. 71)	Add new objective to Policy SCCA1 'Schools' as follows: <i>To engage with the Higher Education Authority (HEA) and the Department of Further and Higher Education, Research, Innovation and Science to support, promote and facilitate the location of third level education facilities within City Edge.</i>
Employment	Policy EMP1 (p. 81)	Add new objective to Policy EMP1 as follows: <i>'To support existing enterprise operations and new enterprise activities, through the provision of flexible employment space and encouraging co-location with other uses including community facilities.'</i>
Red Cow and Cherry Orchard PDA	Figure 25 (p. 141)	Relocate the indicative school site to outside Flood Zone B as shown on Figure 25. Refer to the response to the submission received from the Office of the Planning Regulator regarding the proposed amendments.

Chief Executive's Proposed Amendments (arising from review of document, and mainly for clarity and consistency)	
Location in SURF	Details
Section 2.3.3 Land Use Mix Categories (p.29)	Amend definition of 'Employment Led Mixed Use' in box headed 'SURF Land Use Mix Categories' as follows: From: Areas with a greater focus on employment uses, mixed with residential. To: Areas with a greater focus on employment uses, <i>including urban industry and urban workspaces</i>, mixed with residential. <i>Some scope for convenience retail.</i>
Section 2.3.3 Land Use Mix Categories (p.29)	Amend definition of 'Urban Industry Led' in box headed 'SURF Land Use Mix Categories' as follows: From: Areas suitable for lower density employment uses, including industrial employment uses that can co-locate with other employment uses. Limited scope for residential. To:

	Areas suitable for lower density employment uses, including industrial employment uses that can co-locate with other employment uses. <i>Transitional areas where employment uses will consolidate and intensify over time into more urban forms.</i> Limited scope for residential.
Section 2.3.3 Land Use Mix Categories (p.29)	Amend definition of 'Industry' in box headed 'SURF Land Use Mix Categories' as follows: From: Areas with a focus on lower density employment uses, including industrial employment uses that suit proximity to the national road network. Some scope for convenience retail. No scope for residential. To: Areas with a focus on lower density employment uses, including industrial <i>Areas that provide for enterprise and</i> employment uses that suit proximity to the national road network. Some scope for convenience retail. No scope for residential.
Section 2.3.3 Land Use Mix Categories (p.29)	Amend the below infographic as follows:

	Examples of uses within each land use mix category are as follows:  The diagram consists of three dark green rectangular boxes arranged horizontally. Each box has a circular icon at the top. The first box is labeled 'Employment Uses' and lists 'Office, Urban workspace, Urban industry'. The second box is labeled 'Neighbourhood Resources' and lists 'Retail, Food & Beverage, Leisure, Community / Cultural / Social Infrastructure Facilities, Schools'. The third box is labeled 'Residential Uses' and lists 'Low Density, Mid Density, High Density'. - Amend the heading From: Examples of uses within each land use mix category are as follows: To: Examples of within each land use mix category <i>different types of</i> uses <i>and formats</i> are as follows: - Amend the left panel heading From:
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	Employment Uses: To: Employment Uses: 3. Amend the left panel list From: Office, Urban Workspace, Urban Industry To: Office, Urban Workspace, Urban Industry, <i>Industry</i>. 4. Amend the centre panel heading From Neighbourhood Resources To Neighbourhood Resources <i>Local Centre</i> 5. Amend the right panel heading From: Residential Uses:
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	To: Residential Uses:
Section 2.3.3, Land Use Mix Categories (p.31)	Urban Industry Change from: Urban industrial buildings generally provide lower density employment than urban workspaces do. They serve as important hubs for production, manufacturing, and urban logistics, strategically located near transport hubs and major street networks to optimise accessibility. It is envisaged over time that there is scope for these areas to densify. To: <i>Urban industrial buildings generally accommodate manufacturing, production, and high-value economic activities located within or close to mixed-use urban areas. Unlike traditional industry, it often emphasizes modern, flexible, and sustainable production, that integrates well in an urban environment. Urban industrial type uses may be accommodated in industrial areas as the latter densify over time.</i>
2.10 Local Centres and Retailing, 4th Para, 2nd Sentence. (p.75)	Amend the following sentences: From: While retail will be channelled into local centre areas, retail warehousing will be more suited to areas identified for other land use types such as Employment-Led Mixed Use or Urban Industry that have both

	good public transport and road connectivity. The latter recognises the need to transport bulky goods using private transport. To: While retail will be channelled into local centre areas, retail warehousing will be more suited to areas identified for other land use types such as Employment-Led Mixed Use or Urban Industry that have both good public transport and road connectivity. The latter recognises the need to transport bulky goods using private transport.
Section 2.11 Employment (p.80)	Amend text in green box as follows: - Illustrate 'Criteria for Employment' as the main heading within the box. - Illustrate the text 'Applicants must show they meet the minimum employment floorspace to population requirements' in green to match other headings within the box.
EMP1 Objective 2 (p.81)	Add additional wording to objective as follows: From: To support existing employment uses and diversification into new and emerging sectors within the City Edge area. To: To support existing employment uses and <i>including their integration into new schemes along with</i> diversification into new and emerging sectors within the City Edge area.

EMP1 Objective 5 (p.82)	Amend the objective as follows: From: Locations identified for Employment-Led Mixed Use within areas zoned 'Regen' in the City Edge area shall consist of lighter uses, where the potential for noise pollution, air pollution or other nuisance from industrial uses will not exceed acceptable environmental standards, in the context of the potential for residential and other sensitive uses in close proximity. To: Locations identified for Employment-Led Mixed Use within areas zoned 'Regen' in the City Edge area shall consist of lighter uses, <i>including Office, Urban Industry and Urban Workspaces</i> where the potential for noise pollution, air pollution or other nuisance from industrial uses will not exceed acceptable environmental standards, in the context of the potential for residential and other sensitive uses in close proximity.
EMP1 Objective 6 (p.82)	Amend the objective as follows: From: Locations identified for Urban Industry within areas zoned 'EE' in the City Edge area shall consist of uses such as light and heavy industry, manufacturing (including advanced manufacturing), warehousing, distribution and production. These uses will generally be considered acceptable, subject to appropriate environmental safeguards in accordance with the criteria set out in Chapter 12 'Implementation' of the Development Plan. Development shall provide appropriate buffers / safeguards to adjoining areas with more sensitive uses such as residential. To:

	'Locations identified for Urban Industry within areas zoned 'EE' in the City Edge area shall consist of uses such as light and heavy industry, manufacturing (including advanced manufacturing), warehousing, distribution and production. These uses will generally be considered acceptable, subject to appropriate environmental safeguards in accordance with the criteria set out in Chapter 12 'Implementation' of the Development Plan. Development shall provide appropriate buffers / safeguards to adjoining areas with more sensitive uses such as residential.
Section 2.12.3 Major Parks (p.85)	Insert new sentence at end of the section as follows: <i>'It will be at the discretion of the Planning Authority to accept a financial contribution in lieu of delivery of part of a major park, linear park or greenway in accordance with the Council's Development Contribution Scheme or any future special contribution scheme.'</i>
Section 2.12.4 Community Parks, (p.86)	Insert additional sentence at beginning of the section as follows: <i>'A community park is the equivalent of a small park or local park as set out in the CDP open space hierarchy'.</i> Community parks may manifest in a variety of forms, accommodating different characters of programme within them, and relating in different ways to their immediate context. In all cases they should form part of the wider green network, incorporate a range of activities including active and passive recreation, act as a focal point, and offer a high standard of landscape presentation.
Section 2.12.4 Community Parks, (p.86)	Insert additional sentence at the end of the paragraph headed by 'Community Park Delivery', as follows: <i>'Where a development site contributes a significant proportion of land relative to site size towards provision of part of a major park, linear park or greenway, the community park requirement may be calculated at the lower end of the range i.e. 2sqm per person. Any shortfall will require a contribution in lieu, where appropriate.'</i>

Section 2.12.4, (p.88)	Insert additional wording at end of second bullet point within green box headed 'Criteria for the Location, Design and Delivery of Community Parks, as follows: From: Relate community parks to other green infrastructure either through direct links or along green street connections. To: Relate community parks to other green infrastructure either through direct links or along green street connections <i>and ensure permeability from adjoining lands.</i>
Section 2.12.5, Criteria for On-Site Public Open Space, (p.89)	Amend fifth bullet point as follows: From: At the discretion of the planning authority, all or part of the 10% on-site public open space requirement can be incorporated within community park provision where a developer provides all or part of a community park that is directly adjacent to a development. It should be noted that quantum of public open space provision is additional to quantum of community park provision and the former cannot be subsumed within the latter. To: At the discretion of the planning authority, all or part of the 10% on-site public open space requirement can be incorporated within community park provision where a developer provides all or part of a community park that is directly adjacent to a development. It should be noted that quantum of public open space provision is additional to quantum of community park provision and the former cannot be subsumed within the latter.

NIOS1 Objective 1 (p.90)	Add additional wording to objective as follows: From: Major parks, community parks, green corridors and greenways shall be provided at a rate of 2.5ha per 1,000 population. This is a phasing requirement for each Priority Development Area (PDA) / neighbourhood within a PDA. To: Major, <i>linear parks, and</i> community parks, green corridors and greenways shall be provided at a rate of 2.5ha per 1,000 population. This is a phasing requirement for each Priority Development Area (PDA) / neighbourhood within a PDA. <i>The Council has the discretion to accept a financial contribution in lieu of any remaining open space requirement to achieve the overall standard in accordance with SDCC DCS.</i>
NIOS1 Objective 9, (p.91)	Add additional wording to objective as follows: From: To ensure that all new residential development provides access to parks and open space, in accordance with the requirements of Chapter 3 'Community Infrastructure and Open Space' and Chapter 4 'Green Infrastructure' contained in the County Development Plan To: To ensure that all new residential development provides access to parks and open space, in accordance with the requirements of Chapter 3 'Community Infrastructure and Open Space' and Chapter 4 'Green Infrastructure' contained in the County Development Plan, <i>and in accordance with the additional requirements of the City Edge SURF.</i>

Section 2.15 Flood Risk Management, (p.100)	Add sentence to end of second paragraph to read as follows: <i>'The first 10m of the 20m vegetated riparian buffer cannot count towards the provision of a major, linear or community park.'</i>
Section 2.15.1 Camac Flood Alleviation Scheme and Camac Renaturalisation, (p.101)	Insert additional sentence at the end of the third bullet point to read: <i>'The first 10m of the 20m vegetated riparian buffer cannot count towards the provision of a major, linear or community park.'</i>
Table 14 (p.144) Table 16 (p.160) Table 18 (p.175)	Amend text of PDA Development Guidance Tables as follows: – <i>Projected</i> Population Target – Residential Units <i>Target</i> – Jobs (Min Target) – Employment Floorspace (Min Target in m²)
Table 14 (p.144) Table 16 (p.160) Table 18 (p.175)	Amend Note D of PDA Development Guidance Tables Development as follows: <i>'Employment</i> floor space target considers larger floor plates required for urban industry uses.'

Table 14, (p.144)	Amend Note E of PDA Development Guidance Tables Development as follows:
Table 16 (p.160)	'School numbers to be determined based on demand reflecting growth and latent availability, <i>in consultation with the Department of Education and Youth</i> '.
Table 18 (p.175)	
Appendix 1 to the City Edge SURF, page 3 (Changes to Appendix 6 of County Development Plan; 'Definitions of Use Classes').	Change proposed definition of Urban Industry From: A building or part thereof used for industrial processes such as light and heavy industry, manufacturing (including advanced manufacturing) and production' to <i>'Urban industry comprises manufacturing, production, and high-value economic activities in more intensive urban formats, located within or close to mixed-use urban areas. It often emphasizes modern, flexible, and sustainable production, that integrates well in an urban environment.'</i>

Section 3: Specified Prescribed Bodies – Summaries of Submissions, Recommendations and Chief Executive's Response

3.1 Office of the Planning Regulator: Submissions and Recommendations – URN: SD-C418-36

3.1.1 Introduction:

The Office of the Planning Regulator submission sets out the overarching role and functions of the Office in regard to the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The submission further clarifies the difference between recommendations and observations made within the submission: Recommendations have greater weight and relate to requests to implement or address any issues to ensure consistency with the relevant policy and legislative provisions. Observations issued take the form of a request for further information or a justification on a particular matter or clarification regarding a particular provision within the plan.

3.1.2 Overview:

The Office recognises the significant potential of the City Edge lands to deliver substantial housing and employment growth, supporting sustainable, compact and transit-oriented development on strategically located brownfield lands. This importance is clearly reflected in both the National Planning Framework First Revision (2025) (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly.

The Office welcomes the strong collaboration with Dublin City Council, infrastructure providers and key stakeholders and acknowledges that the City Edge SURF is identified as a planning framework for the purposes of candidate Urban Development Zone designation under the Act. In this regard, the Planning Authority should ensure that the content of the City Edge SURF satisfies the requirements of the Act.

The Office further clarifies that the submission also refers to variation 2 to the South Dublin County Development Plan concerning NPF implementation and housing growth requirements.

The Office also positively notes the designation of three Priority Development Areas (PDAs) with strong potential to deliver significant housing, population growth and employment, as well as the consistent inclusion of Nature-Based Solutions and Sustainable urban Drainage Systems policies throughout the City Edge SURF.

Notwithstanding the above the Office has identified some areas for review/clarification relating to the Core Strategy figures and proposed density ranges. In addition, the Office raises concerns in regard to aspects of the Strategic Flood Risk Assessment (SFRA) including the plan making justification test, updates required to reflect emerging transport policies including the National Transport Authority (NTA) Greater Dublin Area Transport Strategy 2022-2042 review and active travel guidance and the identification of short to medium term deliverables within PDAs supported by a clear monitoring framework to track progress.

The submission sets out 2 Recommendations and 4 observations which are detailed below.

CE Response:

The introductory points raised by the OPR are noted and welcomed. The format and content of the submission are noted in particular the requirements in regard to Recommendations and Observations. In line with the format of the submission a response has been set out to correspond to each of the specific items raised.

CE Recommendation:

No changes to draft plan.

3.1.3 Item 1. Core Strategy and Residential Land Provisions

The Office notes that the adopted Development Plan core strategy table 8 refers to Land Capacity within Strategic Development Areas including the City Edge lands, and sets out that there are 267ha brownfield and 13ha greenfield lands within the area. Table 10 of the adopted County Development Plan includes provision for 1,010 housing units between 2022-2028 at City Edge.

In this regard the Office notes that the majority of City Edge is categorised as Long Term Zoned Land Capacity and it is not anticipated that significant development will occur prior to 2030. The Office further notes that the timeframes set out in section 3.2 of the SURF identify the expectation that PDAs would be developed over the next 10-15 years.

Having regard to the above, the Office notes that the Planning Authority recently published proposed Variation No. 2 which relates to the Housing Growth Guidelines and proposes to update the tables within chapter 2 of the Development Plan relating to the core strategy and settlement strategy. The Office recommends that the Planning Authority provides clarity and explanation for certain information relating to the City Edge lands within the proposed Variation 2 in the context of the information contained within the City Edge SURF documentation.

3.1.4 Observation 1 – Core Strategy and Residential Land Provisions

In order to ensure consistency between the emerging core strategy of the County Development Plan 2022 to 2028 (Development Plan) and other sections of the Development Plan and having considered the following:

- the Development Plans, Guidelines for Planning Authorities 2022 section 3.9 relating to variation to the Development Plan and internal consistency with other parts of the Development plan; and
- the NPF Implementation: Housing Growth Requirements 2025

The Office recommends that the planning authority:

clarify and explain within the City Edge SURF documentation how the quantum of land and the unit capacity figures relating to the City Edge lands within table 8 and the figures provided in table nine of the proposed Variation No. 2 to the South Dublin County Development Plan correspond to the figures relating to quantum of land and potential unit delivery set out in the City Edge SURF documentation.

CE Response:

The points raised by the OPR in regard to consistency between the quantum of land and the unit capacity figures relating to the SURF documentation and the quantum of land and unit capacity figures relating to the Variation 2 are noted.

The South Dublin County Development Plan proposed Variation 2 published in February 2026 indicates within Table 9 that the City Edge lands during the current plan period to 2028 and subsequent Development Plan periods, excluding long term zoned potential would have the capacity for a growth of 7,823 Units. Table 9.2 indicates a capacity to 2028 of 672 Units. The allocation of 672 units, a yearly average of 336 units is considered reasonable and reflects the complex nature of regenerating brownfield lands and the potential delivery within the remaining 2 years of the plan period.

The remaining growth for City Edge accounts for a further 7,151 units up to 2038 (subsequent plan period) within Table 9 which details “the capacity of undeveloped lands within the South Dublin part of City Edge likely to be developable within the current and subsequent Development Plan periods, excluding long-term zoned potential”.

Section 2.4.2 of the SURF details the extent and development potential of Priority Development Areas (PDAs) and details the envisaged overall unit capacity for the three PDAs as 9,084 Units +/- 15%. The key design principles set out in section 2.3.2 detail that the PDAs set out guidance for how each area will evolve in the short to medium term (to approximately 2042). This 2042 development horizon while going beyond the ‘subsequent development plan period of 2038’ seeks to align growth with major infrastructure projects identified as part of national and regional

infrastructure projects and the NTA's GDA Transport Strategy while also providing a level of flexibility to growth within City Edge in recognition of the complex nature of delivering brownfield regeneration at scale.

Such provisions align with the County Development Plan particularly section 2.6.7 'Monitoring of Growth/Active Land Management' where it is set out that the Core Strategy aims to strike a balance between having a physical excess of zoned lands and being able to deliver new development to meet the needs of citizens.

The deliverability analysis, set out in section 2.6.4 of the CDP further seeks to address this by recognising that in an urban environment, there will be market constraints to delivery at any given time and therefore a degree of flexibility has been built into the distribution of the housing and population targets, in line with national and regional policy, to ensure an adequate supply to meet demand. This flexibility requires close monitoring of housing delivery, taking account of the function of each settlement.

The apparent conflict between the envisaged or potential unit capacity to 2042 and the identified unit target as set out in proposed Variation 2 to the County Development Plan is therefore not strictly applicable in this instance. The growth projections set out in Table 9 providing for a unit potential of 7,823 units over this plan period and subsequent plan periods provide a growth of c. 651 units per year which is considered reasonable. The unit capacity of each of the PDAs up to 2042 while being greater than the potential 2038 CDP target reflect this flexible approach to brownfield regeneration lands such as City Edge and the additional 4-year development horizon.

In this regard it is considered reasonable to include a note under Table 2: PDA summary Table detailing the following:

Note: While the identified PDAs have the capacity to deliver in excess of 9,084 units the development of these areas will be subject to monitoring of population and housing targets in accordance with the South Dublin County Development Plan Core Strategy and Policy CS3 which seeks to promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County.

CE Recommendation:

Include the following note under table 2 PDA summary table.

Note: While the identified PDAs have the capacity to deliver in excess of 9,084 units the development of these areas will be subject to monitoring of population and housing targets in accordance with the South Dublin County Development Plan Core Strategy and Policy CS3 which seeks to promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County.

3.1.5 Delivering Sustainable Communities and Compact Growth

The Office welcomes the reference in chapter 2, section 1.4.2 of the proposed variation to the Compact Settlement Guidelines. While the Office acknowledges that the City Edge SURF documents refer to plot ratio, it is noted in chapter 2 and chapter 3 of the SURF that there are generalised references to densities. The Office considers that the SURF is unclear as to what density ranges are proposed within the overall City Edge Lands with each of the 3 PDA areas. The Office therefore recommends that the Planning Authority address this in the City Edge SURF by setting out the proposed densities and taking due account of compliance with the Compact Settlement Guidelines.

3.1.6 Recommendation 1 – Delivering Sustainable Communities and Compact Growth

The Office recommends that the Planning Authority:

- i) Set out the residential densities which are to be applied to the City Edge SURF lands within South Dublin's administrative area and demonstrate compliance with the Compact Settlement Guidelines.
- ii) Set out the residential densities which are to be applied to each of the three priority development areas and demonstrate how they comply with the Compact Settlement Guidelines.

CE Response:

Section 2.6 of the SURF sets out the Intensity of Development for the City Edge SURF and PDA lands. Section 2.6.2 references the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' definition of plot ratio as follows: *'Expresses the proportionate relationship between the area of a site and the total gross floor area of a building(s). It is a measure of the intensity of land use and is calculated by dividing the gross floor area of a building(s) (sum of floorspace within the external walls of the building) by the site area.'*

The Guidelines state that while dwellings per hectare (dph) 'will continue to be the primary measure for residential density' that in the case of mixed-use, commercial and employment areas, 'plot ratio and site coverage standards may also need to be considered in order to manage the scale and massing of development'.

The City Edge SURF has applied this methodology as City Edge will provide for mixed use development throughout with different level of emphasis in different locations on residential, employment, local centre, industrial, etc.

While this should be noted, the methodology for calculating density has also been applied in accordance with Appendix B (Measuring Residential Density) of the Guidelines in the formulation of the illustrative layouts and capacities for the City Edge SURF Priority Development Areas. The block layouts, building envelopes and building heights illustrated, in addition to site specific characteristics including sensitive environmental receptors such as the riparian corridors/canals and existing residential development, have also been considered.

In this regard, the provisions of the County Development Plan and in particular proposed Variation no. 2, Table 5.1 which sets out appropriate density ranges in line with the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024) have been applied. The lands within the City Edge SURF are identified as being located within 'City – Urban Neighbourhoods' where a density range of 50-250 dwellings per hectare will generally be applied.

Such provisions are further clarified through the statement that further refinement of densities will be carried out on a plan led basis based on considerations of centrality and accessibility to services and public transport, character,

amenity and the natural environment. The provision of transport interchanges, the proposed Dart + South-West, Bus Connects and future potential LUAS lines support a compact form of development. 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.

Having regard to the above and in the interests of clarity it is considered reasonable to include reference to the density ranges applicable to the City Edge SURF PDAs as set out in Variation 2 to the County Development Plan.

CE Recommendation:

Amend the heading and text within Section 2.6.2 of the SURF as follows:

From:

2.6.2 PLOT RATIO

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities defines plot ratio as follows: *‘Expresses the proportionate relationship between the area of a site and the total gross floor area of a building(s). It is a measure of the intensity of land use and is calculated by dividing the gross floor area of a building(s) (sum of floorspace within the external walls of the building) by the site area.’*

The Guidelines state that dwellings per hectare (dph) *‘will continue to be the primary measure for residential density’ but that in the case of mixed-use, commercial and employment areas, ‘plot ratio and site coverage standards may also need to be considered in order to manage the scale and massing of development’.*

To:

2.6.2 *DENSITY* and PLOT RATIO

The provisions of the County Development Plan in particular Variation no. 2 to the County Development Plan table 5.1 set out appropriate density ranges in line with the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024). The lands within the City Edge SURF are identified as being located within the category 'City – Urban Neighbourhoods' where a density range of 50-250 dwellings per hectare will generally be applied. As per the provisions of the Guidelines, further refinement of densities will be carried out on a plan led basis based on considerations of centrality and accessibility to services and public transport, character, amenity and the natural environment. The provision of transport interchanges, the proposed DART + South-West, BusConnects and future potential LUAS lines will support a compact form of development. 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.

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities defines plot ratio as follows: 'Expresses the proportionate relationship between the area of a site and the total gross floor area of a building(s). It is a measure of the intensity of land use and is calculated by dividing the gross floor area of a building(s) (sum of floorspace within the external walls of the building) by the site area.'

The Guidelines state that dwellings per hectare (dph) 'will continue to be the primary measure for residential density' but that in the case of mixed-use, commercial and employment areas, 'plot ratio and site coverage standards may also need to be considered in order to manage the scale and massing of development'.

3.1.7 Flood Risk Management

The Office welcomes the preparation of the SFRA to inform the City Edge SURF however some concerns have been raised in regard to the application of the Justification Test for the three PDAs and its alignment with the Flood Risk Management Guidelines.

The Office further identifies that figure 5.2 of the SFRA relating to the Red Cow Cherry Orchard Flood Zone A and B shows that one of the indicative school locations within this PDA is within Flood Zone B. It is contended that as a highly vulnerable development schools are not appropriate within Flood Zone B.

The Office further contends that the SFRA utilises superseded PFRA indicative flood map datasets.

3.1.8 Recommendation 2: Flood Risk Management

The Office recommends that the Planning Authority;

- i) Review and amend the Strategic Flood Risk Assessment to ensure that the plan making justification test is fully consistent with the Flood Risk Guidelines with respect to whether the justification test criteria have been satisfied and whether specified mitigation measures can effectively reduce the risks to an acceptable level while not exacerbating flood risk elsewhere. Any proposals for highly vulnerable developments in (Flood Zone A or B) or less vulnerable development (Flood Zone A) that do not pass the Justification Test in accordance with the Flood Guidelines should be omitted from the adopted Variation.
- ii) Review and amend the location of the indicative school located within Flood Zone B shown on figure 5.2 of the SFRA relating to the Red Cow Cherry Orchard PDA, update the PDA layout accordingly through the City Edge SURF documentation including the SFRA and
- iii) Utilise the most up to date data sets for determining the flood extents within the SFRA.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

CE Response:

OPR Recommendation (i)

The Planning Authority and the Strategic Flood Risk Assessment consultants note the recommendation of the OPR regarding the Plan Making Justification Tests and wish to clarify that the SFRA will be amended to provide more targeted Justification Tests where required (as shown below) and to ensure that appropriate mitigation measures are provided for any areas which require them.

The Planning Authority further confirms that development across all areas within the draft SURF are mixed-use in nature and not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels.

The Planning Authority further notes that the ongoing Camac Flood Alleviation Scheme represents a key mitigation measure for the City Edge area and that its completion will provide an additional layer of flood protection for lands within the plan boundary. In light of this, it is considered that reference should be made to table 3.1 to *The Planning System and Flood Risk Management Guidelines for Planning Authorities, published jointly by the Office of Public Works (OPW) and the Department of the Environment, Heritage and Local Government (DEHLG) in 2009*. This measure would have the effect of amending Policy SWRM2 Objective 1.

OPR Recommendation (ii)

The Planning Authority notes the issues raised in regard to indicative school locations and can confirm that the school location identified as being located within a Flood Zone was shown indicatively within a block also containing a large area of community parkland.

The Planning Authority proposes to reposition the indicative locations of the school and the community parkland and amend the draft SURF accordingly to reflect this repositioning.

OPR Recommendation (iii)

The Planning Authority in consultation with the SFRA consultant wishes to clarify that the PFRA maps are not explicitly referenced in this SFRA. However, the SFRA completed as part of the SDCC County Development Plan 2022 to 2028 (CDP) used the PFRA pluvial maps as the basis for the pluvial flood maps of the County, and since the SFRA for the draft SURF is produced as a Variation to the CDP it was considered appropriate to include the CDP mapping. The Planning Authority further notes that the most recent available OPW community scale pluvial flood mapping sourced from the OPW run website Floodinfo.ie is also included.

CE Recommendation:

1. Amend Policy SWRM2 Objective 1 as follows:

From:

Ensure that all proposed developments take into account the recommendations of the SDCC City Edge Strategic Flood Risk Assessment and where appropriate are accompanied by an individual site level Flood Risk Assessment.

To:

Ensure that all proposed developments take into account the following:

- The recommendations of the SDCC City Edge Strategic Flood Risk Assessment,
- *The vulnerability classification of proposed land uses as set out in Table 3.1 of The Planning System and Flood Risk Management Guidelines for Planning Authorities (OPW/DEHLG, 2009)*
- *The requirements of DECLG Circular P12/2014*
- *The requirements of the EU Flood Directive and*
- *The flood protection provisions which will come forward from the Camac Flood Alleviation Scheme,*

and where appropriate are accompanied by an individual site-level Flood Risk Assessment.

2. Amend all relevant maps/figures relating to the Red Cow Cherry Orchard PDA to relocate the indicative school site as shown on Figures 25 of the SURF and 5-2 of the City Edge SURF – Strategic Flood Risk Assessment by repositioning the indicative locations of the school and the community parkland.

3. No change to draft plan.

3.1.9 Land Use Planning and Transportation

The Office outlines that the NTA Greater Dublin Area Transport Strategy 2022-2042 is the subject of review every 6 years. The next review of the Strategy is due to commence in 2027. The Office notes that section 42(8)(c)(iv) of the Act states that in making a variation to the Development Plan a planning authority shall take due account of any relevant transport strategy of the NTA which relates to all or any part of the functional area of the Planning Authority.

As such the Office considers that the SURF should refer to the forthcoming review of the Strategy and the need for alignment with any future Strategy review. The Office further identifies additional updates to refer to the content of the NTA Cycle Design Manual and to maintain the carrying capacity and safety of the Strategy road network.

3.1.10 Observation 2 – Land Use Planning and Transportation

- i) Update Chapter 2, section 2.5.4 of the City Edge SURF which deals with public transport – existing, planned and proposed to refer to the review of the NTA, Greater Dublin Area Transport Strategy 2022-2042 and the need for alignment with any future Strategy review;
- ii) Refer to the Cycle Design Manual within the City Edge SURF chapter 2, section 2.5.7.1 Cycle Parking;
- iii) Update chapter 2, section 2.5 Movement of the City Edge SURF to refer to the need to maintain the operation and safety of the M50 and the N7 and the need to protect the strategic road network.

CE Response:

- i) The Planning Authority acknowledges the OPR's observations regarding alignment with the Greater Dublin Area Transport Strategy (GDATS) and confirms that ongoing engagement and coordination with the NTA and TII is a core component of the SURF approach. Attention is drawn to Policy MOV2 and Objective 2 of that policy which actively encourage the cooperation between the Council, the NTA and TII to facilitate the delivery of public

transport projects. Attention is also drawn to SM3 Objective 2 of the South Dublin County Development Plan 2022 – 2028 which seeks to facilitate and secure the implementation of major public transport projects in line with the GDATS or any superseding documents.

It is considered that including the recommended phrasing will only create unnecessary duplication. Rather, it is considered appropriate that the SURF maintains a degree of flexibility, having regard to the fact that the GDATS is subject to regular review cycles, and that continued engagement with the NTA and TII will ensure alignment with future iterations of transport policy. An amendment to Policy MOV2: Public Transport is recommended.

- ii) The proposal put forward by the OPR re. reference to the Cycle Design Manual is noted however it should be noted that SM2 Objective 6 of the South Dublin County Development Plan 2022 – 2028 seeks *“To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual **or any updated guidance** and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.”*

(Note: Bold added for emphasis).

It is acknowledged that the National Cycle Manual has been superseded by The Cycle Design Manual but it is contended that the objective listed above adequately deals with this change and any future revisions. A full review of the County Development Plan will be carried out where such provisions and updates can be considered. In this regard, no amendment is recommended.

- iii) The proposal put forward in regard to the operational capacity of National Roads is noted however attention is drawn to **SM6 Objective 4** of the **South Dublin County Development Plan 2022 – 2028** which seeks *“To maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012), the Trans-European Transport Networks (TEN-T) Regulations and with regard to other policy documents such as the*

TII M50 Demand Management Report 2014 and the N4 and N7 Corridor Study 2017.”The inclusion of an additional section within the SURF will only result in the duplication of already well-established policies. It is important to note that the SURF is an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 apply unless otherwise stated in the SURF (as set out on p.6). No amendment in this regard is recommended.

CE Recommendation:

No change to draft plan.

3.1.11 Implementation and Monitoring

The Office notes the contents of chapter 4 relating to the implementation of the City Edge SURF and considers that there are a number of elements that would be beneficial to include at this stage Including short- and medium-term deliverables. The Office considers that it would be beneficial if the short to medium-term deliverables which may be achieved are factored into the phasing strategy for the City Edge lands.

In addition, the Office recommends a monitoring programme be included within the implementation chapter which may include reporting timelines, evaluation criteria and reporting for the City Edge SURF proposals to measure progress and ensure environmental policies and objectives within Development Plan are monitored.

3.1.12 Observation 3:

Having regard to the need to ensure the timely and coordinated implementation of all supporting elements of the City Edge SURF with respect to the delivery of housing and having considered NPO 108 of the NPF with respect to the monitoring of the National Planning Framework First Revision (2025), particularly around city-based growth, compact growth and infrastructure delivery the Planning Authority is advised to:

- i) Provide clarity around any short to medium term deliverable which may be achieved and factored into the phasing strategy within the City Edge Land in particular the three PDAs; and

- ii) Set out the detail of the proposed monitoring programme for the City Edge SURF proposals in order to measure progress and to ensure environmental policies and objectives of the County Development Plan are monitored.

CE Response:

- i) The Phasing Strategy set out in Chapter 4 details the phasing programme required to ensure the coordinated planning and delivery of essential strategic and local infrastructure, amenities and community facilities in advance of and in tandem with population growth. Short to medium term deliverables have been considered and are included within Phases 0-2 of the strategy which link growth/development within each PDA up to 25% to the delivery of key infrastructure such as streets, specific levels of transport infrastructure, social infrastructure, local centres, parks, green and blue infrastructure and utilities and energy.
- ii) In regard to monitoring, it is important to note that the SURF is an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 apply unless otherwise stated in the SURF (p.6).

Chapter 12 of the Development Plan 'Implementation and Monitoring' is therefore applicable to the City Edge SURF. Section 12.12.5 sets out the monitoring framework under which the City Edge SURF will sit. The monitoring framework sets out under CS2 City Edge Regeneration Lands that monitoring of development (key performance and data sources) will be carried out through the Development Management process while all other monitoring aspects of the SURF will be carried out where applicable under each of the Chapter headings and monitoring sources set out within the County Development Plan.

While the above should be noted, the observations of the OPR have been taken into consideration and it is considered reasonable to add clarity within Chapter 4 of the City Edge SURF regarding Monitoring. In this regard it is recommended that wording be inserted after Section 4.4 under the heading 'Monitoring' which clarifies that the Monitoring Framework from the Development Plan as set out in Section 12.12.5 shall apply to the City Edge SURF.

CE Recommendation:

Insert a new section in Chapter 4 of the SURF 4.4 MONITORING and move the existing section 4.4 FUNDING to section 4.5:

Insert the following text under section **4.4: MONITORING**

The objectives outlined in the City Edge SURF are designed insofar as possible having regard to their subject matter, to be specific, measurable, achievable, and realistic, as per section 12.12.5 of the SDCC County Development Plan.

The Planning Section of South Dublin County Council will progress the monitoring and implementation of the SURF, primarily through its development management functions and the various phasing thresholds set out in section 4.1 Overall Phasing Strategy and 4.2 PDA Phasing of the SURF. However, it is essential to acknowledge that the SURF also necessitates coordination across various directorates and departments, including those within South Dublin and bodies outside it, to ensure a cohesive approach to development and policy delivery.

Furthermore, the SURF will be subject to regular review and reassessment, particularly in response to changes in legislation, new guidelines, or emerging circumstances. This process will evaluate progress, identify areas where adjustments are necessary, and determine whether amendments or variations to the SURF are required to better serve the evolving needs of the community and align with strategic objectives.

3.1.13 Development outside of the three Priority Development Areas

The Office supports the identification of the three PDAs which the planning authority outlines would be the focus of development over the next 10 to 15 years. It is noted that Policy PDA 4 Objective 1 identifies that save for exceptional circumstances significant new residential and high intensity employment would be considered premature. The Office requests that the Planning Authority clarifies what the criteria for the 'exceptional circumstances' comprises of and identify how this is to be demonstrated in the SURF.

3.1.14 Observation 4: Development outside of the three Priority Development Areas

In order to ensure clarity, the Planning Authority is advised to set out the criteria for the 'exceptional circumstances' which are to be applied in relation to PDA 4 Objective 1 and how they are to be demonstrated.

CE Response:

The City Edge SURF identifies 'Priority Development Areas' as a sequencing mechanism with integrated phasing of infrastructure, that will channel development into the most appropriate areas in the short to medium term. This strategy of focussing on particular areas which are expected to deliver early development in a co-ordinated way which supports transport-oriented development, is most likely to deliver transformational change, is the most efficient use of both public and private investment, and will help bridge the viability gap that will exist in the early stages of the regeneration of City Edge. Within the SURF, the policy is therefore to give preference to development within PDAs. Delivery of new infrastructure in the short to medium term will also be focussed on PDAs in order to support regeneration.

PDA4 Objective 1 provides a level of flexibility in this regard by stating 'Save for exceptional circumstances, significant new residential and high intensity employment uses outside PDAs will be considered premature'.

It is considered that this is clarified through Policy PDA 4 which sets out that new development outside the PDAs will generally only be permitted where it is demonstrated that it would not result in piecemeal development, that adequate amenity will be provided, and that it would be compliant with the City Edge Strategic Urban Regeneration Framework (SURF) and relevant Development Plan policies.

It is therefore not considered necessary to specify what exceptional circumstances would entail as the provisions of Policy PDA 4 are considered to be sufficient.

CE Recommendation:

No change to draft plan.

3.2 National Transport Authority: Submission – URN: SD-C418-28

3.2.1 Introduction

The NTA supports the identification of the City Edge Area as an area of significant regional importance and looks forward to continued collaboration with the relevant stakeholders in this regard.

The NTA would support the UDZ designation approach given the comprehensive regeneration and development opportunities that exist in this area.

The NTA supports the proposal to include 'depots used for public transport services' in the 'public services' use class which is permitted in principle under both the regeneration 'REGEN' and employment and enterprise, 'EE' zonings.

The NTA notes the accompanying 'Transport Modelling' report and acknowledges the conclusions set out in Section 7.

CE Response

The Planning Authority recognises the NTA's support for the identification of the City Edge area as one of regional importance and its positive position regarding a future proposed UDZ designation.

The Planning Authority welcomes the NTA's support for the inclusion of public transport depots within the "public services use class" and notes the NTA's acknowledgement of the Transport Modelling report.

CE Recommendation

No change to draft plan.

3.2.2 Maps

The NTA is concerned that the Maps in Chapter 2 as presented, in particular Figures 5 & 6 relating to transport, are difficult to read. In the interest of clarity, consideration should be given to including more identifying street names, making these more prominent and to improving the differentiation between colours used across the legend.

CE Response

The comments of the NTA have been noted and it is proposed to amend Figures 5 and 6 relating to transport as requested.

CE Recommendation

Amend Figures 5 and 6 to make street names more prominent and to improve the differentiation between colours used across the respective legends.

3.2.3 Key Principles for Land Use

Section 2.3.3 sets out 'Key Principles for Land-use' within the plan lands. The NTA supports the principles set out, in particular, the commitment 'To provide for new mixed use residential and employment communities, through sustainable higher density urban forms, served by high quality public transport and active travel links.'

The NTA is of the view that this would be further strengthened through the inclusion of a principle linking density to public transport accessibility. A land use principle should be included to ensure that density is maximised across the area in general and that there is a gradient of intensity towards public transport hubs

The NTA refers to the examples of typologies for densities (Section 2.3.3) which refers to building height in defining residential densities. It is recommended that reference to dwellings per hectare or beds per hectare is also included here as more appropriate measures of intensity of development and impact on infrastructure.

CE Response

Access to existing and proposed public transport was a fundamental starting point for the urban design of City Edge and was one of the main factors considered to identify PDAs. This is outlined in Section 2.4.1 'Purpose of Priority Development Areas' and again in section 3.2 'Selection of Priority Development Areas'.

Fig 9: 'Indicative building height approach across City Edge' indicates approximate upper limits of heights and generally shows greater height in proximity to public transport route and nodes.

Notwithstanding the examples set out above, it is considered reasonable and appropriate to more explicitly link density with public transport accessibility. In this regard, the provisions of the County Development Plan and in particular Variation no. 2 Table 5.1 which sets out appropriate density ranges in line with the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024), have been applied. The lands within the City Edge SURF are identified as being located within 'City - Urban Neighbourhoods' where a density range of 50-250 dwellings per hectare will generally be applied.

Such provisions are further clarified through the statement that further refinement of densities will be carried out on a plan led basis based on considerations of centrality and accessibility to services and public transport, character, amenity and the natural environment. The provision of transport interchanges, the proposed Dart + South-West, BusConnects and future potential LUAS lines support a compact form of development. 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.

Having regard to the above and in the interests of clarity it is considered reasonable to include reference to the density ranges applicable to the City Edge SURF PDAs as set out in Variation 2 to the County Development Plan.

CE Recommendation

Amendment to Section 2.3.2 (P.28) to include the following text to the first Key Principle for Land use:

From:

To provide for new mixed use residential and employment communities, through sustainable higher density urban forms, served by high quality public transport and active travel links.

To:

To provide for new mixed use residential and employment communities, through sustainable higher density urban forms, served by high quality public transport and active travel links *with density increasing in accordance with public transport accessibility.*

See also amendment to section 2.6.2 DENSITY AND PLOT RATIO in response to the OPR's submission.

3.2.4 Priority Development Areas

General support is shown for the identification of PDAs in in close proximity to existing and/or proposed future public transport.

Reference is made to PDA4 Objective 1 of the City Edge SURF and that consideration should be given to defining “exceptional circumstances” as it is currently unclear what may be considered.

Section 3.3.5 Red Cow and Cherry Orchard PDA:

The Land-use Strategy and Aspirations includes the aspiration to *“Provide a crossing over the Naas Road at Oak Road to provide connectivity and to facilitate future orbital public transport.”* This statement should be amended to include that *‘the design of such should provide high quality and seamless interchange.’*

Naas Road/Long Mile Road

The submission notes that a cycle crossing at the Naas Road/Long Mile Road/ Nangor Road junction forms part of the Tallaght / Clondalkin Core Bus Corridor which was granted permission in October 2024. Any development here should align with the approved design.

CE Response

The Planning Authority acknowledges the support shown for the identification of PDAs in in close proximity to existing and/or proposed future public transport.

The Planning Authority notes the NTA's recommendation to define "exceptional circumstance" in PDA4 Objective 1. PDA4 Objective 1 should not be read in isolation, but instead in the context of Policy PDA4 as a whole and its accompanying objectives, which together set out the criteria for assessing development outside PDAs. Failure to meet the criteria set out in Policy PDA4 and its objectives would undermine any claim that exceptional circumstances exist. In this regard, no amendment is recommended.

The Planning Authority notes the NTA's recommendation to include phrasing in Section 3.3.5 Red Cow and Cherry Orchard PDA: Land-use Strategy and Aspirations, however the inclusion of phrasing such as "seamless interchange" is considered ambiguous, difficult to define, and offers no real value to the existing phrase. In this regard, no amendment is recommended.

The Planning Authority acknowledges the NTA's submission regarding the Tallaght / Clondalkin Core Bus Corridor. An amendment to the wording to the relevant Land Use Strategy and Aspiration is warranted. For further clarification, an amendment to Figure 22 is recommended, that illustrates the location of the proposed cycle crossing at the Naas Road/Long Mile Road/ Nangor Road junction and the Proposed Naas Road Crossing.

CE Recommendation

1. Amendment to the Red Cow & Cherry Orchard PDA: Land-Use Strategy and Aspirations as follows:

From:

Provide a cycle crossing at the Naas Road/Long Mile Road/Nangor Road junction that sets a design standard as a flagship piece of infrastructure for the City Edge area.

To:

Provide a cycle crossing at the Naas Road/Long Mile Road/Nangor Road junction that sets a design standard as a flagship piece of infrastructure for the City Edge area, *ensuring consistency with permitted and proposed infrastructure schemes.*

2. Amendment to Figure 22 that illustrates the location of the proposed cycle crossing at the Naas Road/Long Mile Road/ Nangor Road junction and the proposed Naas Road Crossing.

3.2.5 Movement

MOV 1: The NTA supports the Objectives included under MOV1, Section 2.5.3 'Active Travel – Pedestrian and Cyclist Movement'. It is recommended that this Section should also refer to the Cycle Design Manual and include an additional Objective to ensure that facilities are provided in accordance with the principles, approaches and standards.

With regard to Section 2.5.4, dealing with 'Public Transport: Existing, Planned and Proposed', the NTA recommends the following:

That this Section recognises the forthcoming review of the Greater Dublin Area Transport Strategy (GDATS) and the need for iteration and alignment between the City Edge planning framework and any future Strategy review. The NTA recommends that the following text is included:

"The GDATS is reviewed every 6 years with the next one to commence in 2027. The iteration between the emerging City Edge land use plans and the GDATS will be a key feature of the coordination between the local authorities and

transport agencies. This iteration will directly inform the transport projects and associated supporting land use and urban form principles that are required for City Edge to function in a sustainable manner.”;

‘Other Public Transport Proposals’

The NTA recommend that the Section ‘Other Public Transport Proposals’ (pg49) be amended as follows: *‘The City Edge Strategic Framework (2022) proposed two orbital public transport routes that are provided for but not identified in not contained within the GDA Transport Strategy.’*

Mov 2 Objective 1

The NTA recommend that That MOV 2 Objective 1 should include a commitment to reserve land for future light rail on Inner and Outer Orbital routes; and

Mov 2 Objective 2

That Objective MOV2 Objective 2 is amended as follows: *“To engage with the NTA and TII ~~regarding~~ to support and facilitate the implementation of BusConnects schemes within the City Edge area including agreement on public realm design including provision for pedestrians and cyclists, greening and SuDS, and design of the cycle bridge at the Naas Road/Long Mile Road/Nangor Road Junction.”*

INT4 – Park and Ride

The NTA recommend the removal of the reference to ‘Measure INT4 – Park & Ride’ as quoted from the GDA Strategy.

Table 3

The NTA recommend the removal of the reference to ‘Tram’ in Table 3 as Tram and Light Rail are considered to be the same.

Oak Road

The NTA recommend the addition of Oak Road / Naas Road as an interchange between high-quality orbital and some radial services is considered.

CE Response

MOV 1:

The Planning Authority recognises the NTA's support for the Active Travel objectives (MOV1) and notes that the SURF prioritises walking, cycling and public transport in line with the 10-minute city principle and sustainable mobility objectives. It is noted that SM2 Objective 6 of the South Dublin County Development Plan 2022 – 2028 seeks *“To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual **or any updated guidance** and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.”* It is acknowledged that the National Cycle Manual has been superseded by The Cycle Design Manual but it is contended that the objective listed above adequately deals with this change and any future revisions. In this regard, no amendment is recommended.

With regard to Section 2.5.4, dealing with ‘Public Transport: Existing, Planned and Proposed’, the NTA recommends the following:

The Planning Authority acknowledges the NTA's recommendations regarding alignment with the Greater Dublin Area Transport Strategy (GDATS) and confirms that ongoing engagement and coordination with the NTA and TII is a core component of the SURF approach. Attention is drawn to Policy MOV2 and Objective MOV2 Objective 2 which actively encourage the cooperation between the Council, the NTA and TII to facilitate the delivery of public transport projects. Attention is also drawn to SM3 Objective 2 of the South Dublin County Development Plan 2022 – 2028 which seeks to facilitate and secure the implementation of major public transport projects in line with the GDATS or any superseding documents.

It is considered that the inclusion of the recommended phrasing will only create unnecessary duplication. Rather, it is considered appropriate that the SURF maintains a degree of flexibility, having regard to the fact that the GDATS is subject to regular review cycles, and that continued engagement with the NTA and TII will ensure alignment with future iterations of transport policy. An amendment to Policy MOV2: Public Transport is recommended.

'Other Public Transport Proposals'

The proposed amendment to Section 'Other Public Transport Proposals' on (p.46) is considered reasonable, given that the GDATS makes mention of the orbital routes. Amendment recommended.

Mov 2 Objective 1

With regards to the NTA's recommendation that MOV2 Objective 1 should include a commitment to reserve land for future light rail on Inner and Outer Orbital routes. The objective seeks to progress delivery of public transport routes by considering alignment options and exploring street design requirements. It is contended that this objective already makes sufficient provision for the NTA's recommendation and that the addition of additional phrasing will only result in duplication. No amendment in this regard is recommended. It is noted that the intersection of Naas Road and Oak Road has been identified as a proposed crossing in Figure 22 (See NTA's amendment above).

Mov 2 Objective 2

The NTA's amendment to MOV2 Objective 2 is considered reasonable. An amendment is recommended.

INT4 – Park and Ride

The NTA have recommended the removal of 'Measure INT4 – Park & Ride', however no rationale has been provided. It is contended that the proposed SURF merely summarises the measures contained within the GDATS. In the absence of any rationale, the removal of this measure would require the removal of the remaining measures from the proposed SURF. It is further contended that SM3 Objective 2 of the South Dublin County Development Plan 2022 – 2028 already

provides some level of flexibility should the review of the GDATS remove this measure. In this regard, no amendment is recommended.

Table 3

The removal of the word “Tram” from Table 3 (p.51) is considered reasonable and an amendment in this regard is recommended.

Oak Road

Having regard to the fact that Oak Road has been earmarked as a proposed Orbital Route, and Naas Road has been earmarked as an Arterial Road, it is considered reasonable to include a Mobility Hub Type 3 at the intersection of Naas Road and Oak Road. An amendment in this regard is recommended.

CE Recommendation:

1. Amendment to Policy MOV2: Public Transport (p.48) as follows:

From:

To continue to work with the NTA and TII to facilitate the delivery of public transport projects with the goal of providing sufficient capacity in a phased manner to support development of the City Edge Priority Development Areas.

To:

To continue to work with the NTA and TII to facilitate the delivery of public transport projects, *and to ensure alignment with evolving national and regional transport strategies*, with the goal of providing sufficient capacity in a phased manner to support development of the City Edge Priority Development Areas.

2. Amendment to Section “Other Public Transport Proposals” (p.46) as follows:

From:

The City Edge Strategic Framework (2022) proposed two orbital public transport routes that are not contained within the GDA Transport Strategy.

To:

The City Edge Strategic Framework (2022) proposed two orbital public transport routes that are ~~not contained~~ *provided for but not identified* within the GDA Transport Strategy.

3. Amendment to MOV2 Objective 2 as follows:

From:

To engage with the NTA and TII regarding implementation of BusConnects schemes within the City Edge area including agreement on public realm design including provision for pedestrians and cyclists, greening and SuDS, and design of the cycle bridge at the Naas Road/Long Mile Road/Nangor Road Junction.

To:

To engage with the NTA and TII ~~regarding~~ *to support and facilitate the* implementation of BusConnects schemes within the City Edge area including agreement on public realm design including provision for pedestrians and cyclists, greening and SuDS, and design of the cycle bridge at the Naas Road/Long Mile Road/Nangor Road Junction.

4. Amendment to Table 3: Mobility Hub Components and Realm Improvements (p.51) by removing the word “Tram”.

5. Amendment to Figures 7 and 8 and any other resultant maps/figures to depict a Mobility Hub Type 3 at the intersection of Oak Road and Naas Road.

3.2.6 Cycle Parking

Reference is made to MOV4 Objective 1 and Section 6.1 of the Cycle Design Manual. The submission notes that the provision of cycle parking in 'shared parking buildings' should not be seen as an alternative to on-site cycle parking provision. The wording of MOV 4 Objective 1 and the supporting text on '*Implementation of Cycle Parking*' should be reconsidered to ensure that cycling is prioritised over car through the location of parking.

The submission notes that under circumstances where repurposing of shared parking buildings takes place, there should be no net loss in cycle parking provision and that this should be stated in the plan.

Regarding the section 'Implementing Cycle Parking' (pg54) the following additions are also recommended:

- 'Cycle Parking will be provided in line with the CDP standard, with reference to the Planning Design Standards for Apartments, Guidelines for Planning Authorities, 2025 (or any superseding document) and in accordance with the Cycle Design Manual.'
- Parking facilities will include provision for personal mobility devices such as e-scooters and a range of cycle types including cargo and accessible bikes.'

CE Response

The Planning Authority acknowledges the NTA's submission regarding the proposed changes to MOV4 Objective 1 and the rationale provided. It is considered reasonable to amend the relevant objective and associated text. It is contended that cycle parking provisions should be created at destinations (i.e. developments or places of employment) rather than centralising this provision to a shared parking building. This will ensure that cycling remains an attractive option. In this regard, an amendment is recommended.

The Planning Authority notes the NTA's recommendation to ensure that there is no net loss of cycle parking when "shared parking buildings" are repurposed. This is considered reasonable, and an amendment in this regard is warranted.

The Planning Authority acknowledges the recommendations in relation to "Implementation of Cycle Parking" (p.54) and these amendments are considered reasonable. In this regard, some amendments are recommended.

CE Recommendation

1. An amendment to MOV4 Objective 1 as follows:

From:

To require the provision of resident, employee and visitor cycle parking on site, unless the developer / applicant can demonstrate that cycle parking can be provided for in whole or in part in a shared parking building.

To:

To require the provision of resident, employee and visitor cycle parking on site. ~~unless the developer / applicant can demonstrate that cycle parking can be provided for in whole or in part in a shared parking building.~~

2. An amendment to "Implementation of Cycle Parking" (p.54) as follows:

From:

Where there is existing capacity in a nearby shared parking building, a lower level may be provided on site, if it can be demonstrated that the required standard is still met.

To:

~~Where there is existing capacity in a nearby shared parking building, a lower level may be provided on site, if it can be demonstrated that the required standard is still met.~~

3. Amendment to Section 2.5.7.2 Car Parking (p. 54 – 55) to include the following text:

From:

An alternative parking model is proposed for City Edge which facilitates the parking needs of residents (and other users) in collective multi-use parking buildings rather than individual parking areas situated under each apartment development. These buildings are referred to as 'shared parking buildings'. They will be designed with future re-purposing in mind, when enhanced public transport is delivered, reducing the need for private transport.

To:

An alternative parking model is proposed for City Edge which facilitates the parking needs of residents (and other users) in collective multi-use parking buildings rather than individual parking areas situated under each apartment development. These buildings are referred to as 'shared parking buildings'. They will be designed with future re-purposing in mind *(provided that there is no net loss of cycle parking facilities)*, when enhanced public transport is delivered, reducing the need for private transport.

4. Minor amendment to "Implementation of Cycle Parking" (p.54) to include the following text:

From:

Cycle Parking will be provided in line with the CDP standard, with reference to the Planning Design Standards for Apartments, Guidelines for Planning Authorities, 2025 (or any superseding document).

To:

Cycle Parking will be provided in line with the CDP standard, with reference to the Planning Design Standards for Apartments, Guidelines for Planning Authorities, 2025, *in accordance with the Cycle Design Manual, or any superseding documents.*

5. Minor amendment to “Implementation of Cycle Parking” (p.54) to include the following text:

From:

Parking facilities will include provision for personal mobility devices such as e-scooters.

To:

Parking facilities will include provision for personal mobility devices such as e-scooters *and a range of cycle types including cargo and accessible bikes.*

3.2.7 Car Parking

The NTA supports the use of car parking as a demand management tool and the alternative car parking model proposed for City Edge in Section 2.5.7.2 which facilitates the parking needs of residents (and other users) in collective multi-use parking buildings rather than individual parking areas situated under each apartment development.

The submission supports an approach that aims to reduce car parking provision as public transport accessibility increases and to minimise on-site car parking in the longer-term applying this same approach to cycle parking would not be supported. Guidance relating to cycle parking as it relates to ‘parking typologies’ should be contained in Section 2.5.7.1 ‘Cycle Parking’ and not conflated with Car Parking guidance.

CE Response

The Planning Authority acknowledges the NTA’s support for alternative car parking models.

The support for reducing car parking over time as public transport improves is welcomed and aligns with the wider aim of moving away from car-dependent development.

However, it is not considered appropriate to treat cycle parking entirely separately from car parking within the 'parking typologies' section. This part of the policy is intended to set out a joined-up approach to how all types of parking, both car and cycle, are incorporated into the overall design of developments and the public realm. Looking at them together helps ensure a more coherent and easy-to-understand design approach, particularly in how layouts work, how people access spaces, and how sites can adapt over time. In this regard, no amendment is recommended.

CE Recommendation

No change to draft plan.

3.2.8 Implementation

Support is shown for the proposed approach which links development to infrastructure delivery and which focuses on this delivery in the Phasing Strategy rather than on specific years or time periods.

Reference is made to Table 20 and recommends that this is reviewed to ensure consistency between the numbers as presented and the supporting text clarification on units listed and the text in the 'Note' column (2325+1300 > 2600).

CE Response

The Planning Authority acknowledges the support shown for the proposed approach which links development to infrastructure delivery.

The Planning Authority notes the NTA's submission regarding the clarity of the figures contained in Table 20 and acknowledges that a typographical error has occurred. An amendment in this regard is recommended.

CE Recommendation

Minor amendment to Table 20 to address a typographical error as follows:

From:

Occupation of further 2,400 units shall be subject to agreement and based on the timeline for the delivery and operation of the Bus Connects Route. Total 2,600 Units.

To:

Occupation of further 2,400 units shall be subject to agreement and based on the timeline for the delivery and operation of the Bus Connects Route. ~~Total 2,600 Units.~~ *Total 3,625 Units.*

3.3 Eastern and Midland Regional Assembly: Submission - URN: SD-C418-13

3.3.1 Introduction:

The submission begins by welcoming the opportunity to consult on Variation No. 3, the City Edge SURF and sets out the statutory role of the Eastern and Midland Regional Assembly (EMRA) within Ireland's regional governance framework, including delivery and oversight of the Regional Spatial and Economic Strategy (RSES), coordination of development plans, and alignment with national policy objectives.

The submission notes the legislative transition from the Planning and Development Act 2000 to the Planning and Development Act 2024, which expands the remit and functions of Regional Assemblies. EMRA emphasises its obligation to support national climate objectives under the Climate Action and Low Carbon Development Act.

EMRA highlights its strategic function in ensuring alignment between national, regional, and local policy, particularly in the context of large-scale regeneration proposals such as City Edge.

3.3.2 Context

The RSES (2019–2031) is identified as a long-term strategic framework for sustainable regional growth, underpinned by 16 Regional Strategic Outcomes (RSOs) aligned with National Strategic Outcomes (NSOs) and the Core principles of; Healthy Placemaking, Climate Action and Economic Opportunity.

The Strategy supports delivery of Project Ireland 2040 through integrated spatial and investment planning, ensuring that development is aligned with infrastructure provision.

The RSES also establishes the statutory Metropolitan Area Strategic Plan (MASP) for Dublin, positioning the capital as a climate-resilient, globally competitive city region.

The Assembly confirms that a review of the RSES is underway (2026) in accordance with the Planning and Development Act 2024. Key requirements include:

- Consistency with updated national frameworks (NPF 2025, NDP 2025, NMPF)
- Engagement with local authorities and stakeholders
- Strengthened alignment between policy tiers
- The review provides an updated strategic context for assessing the City Edge proposal.

Under the Planning and Development Act 2024, the Assembly is no longer statutorily required to comment on Development Plan variations however it is considered that the City Edge project is of regional significance given the area is identified in NPF 2025 as a model for large-scale brownfield regeneration, is recognised in the MASP as a strategic landbank for compact growth and is critical to delivering housing supply, climate targets and employment growth. The project is therefore regarded as having transformational potential for the Dublin Metropolitan Area.

The Assembly notes that the proposed Variation seeks to Incorporate the City Edge Strategic Urban Regeneration Framework (SURF) into the Development Plan, provide a statutory planning framework for the SDCC lands and support future designation as an Urban Development Zone (UDZ)

It is also acknowledged that the SURF refines earlier frameworks through detailed analysis across themes such as movement, land use and economy.

CE Response:

The introductory points raised by the Assembly are noted.

CE Recommendation:

No change to draft plan.

3.3.3 Urban Development Zone (UDZ)

The Assembly is supportive of the UDZ-led approach, noting alignment with future provisions of the Planning and Development Act 2024. The Assembly outlines the need to ensure compliance with Section 603 of the Planning Development Act and the requirements in regard to UDZs. The importance of formal governance structures, including; multi-agency coordination and joint decision-making mechanisms is also outlined.

In this regard it is proposed that EMRA be included within the City Edge Steering Group to ensure policy alignment and coordinated delivery.

CE Response:

The points raised by the EMRA in regard to UDZ designation, compliance with the provisions of Section 603 of the Act of 2024 and the request for the Assembly to be included within the City Edge Steering Group are noted.

It is considered reasonable that this request for inclusion on the City Edge Steering Group be considered at the next City Edge Steering Group Meeting and that further engagement be carried out with identified representatives from the Assembly.

CE Recommendation:

No change to draft plan.

3.3.4 Priority Development Areas:

The Assembly notes the identification of three Priority Development Areas (PDAs), namely, Red Cow & Cherry Orchard (52ha), Long Mile (23ha) and Greenhills (53ha) within the City Edge SURF. The Assembly supports this phased and sequential development approach aligned with MASP objectives.

CE Response:

Noted

CE Recommendation:

No change to the draft plan.

3.3.5 Integrated Land Use and Transportation Strategy

The Assembly notes that the SURF promotes a transport orientated development pattern, the 10-minute settlement concept and compact/sustainable growth.

It is further stated that SDCC forms part of the Dublin MASP and it is a statutory requirement that the RSES and Development Plans, inclusive of the City Edge SURF, within the GDA are mutually consistent with the Greater Dublin Area Transport Strategy 2022-2042, as prepared by the NTA. The Regional Assembly notes the strategic objectives of the Draft City Edge SURF to promote *“sustainable movement, the 10-minute city principle and compact growth, so that all future residents and workers will have access to essential daily services within a short walk or cycle and easy access to high-quality public transport”*. The strategic objectives align with Regional Policy Objectives (RPOs) 8.2-8.4 and 9.10 (healthy placemaking) of the RSES 2019.

In this regard the Assembly supports and welcomes continued coordination with transport agencies and encourages the application of 15-minute city principles and best practice mobility frameworks. It is further stated that the Metropolitan Areas Strategic Plan (MASP) implementation group, organised by EMRA also provides a platform to ensure the co-ordinated provision of transport and infrastructure in the Dublin Metropolitan Area.

CE Response:

The Assembly's comments in regard to the SURF, the promotion of Transport Orientated Development pattern, the 10-minute settlement concept, alignment with the GDA Transport Strategies and compact/sustainable growth are noted.

The details in regard to the workings of the MASP implementation group are also noted and will be taken into consideration as part of the implementation framework for the City Edge SURF.

CE Recommendation:

No change to draft plan.

3.3.6 Housing:

The Assembly notes significant housing pressures in the Dublin Metropolitan Area and the national target to deliver 50,000 homes annually to 2040. It is recognised that City Edge aims to deliver up to 40,000 homes (long-term) and approx. 9,084 homes in the short-medium term

The Assembly supports mixed-use, compact neighbourhoods, diverse housing typologies and tenure and the integration of affordable and social housing. Regional Policy Objectives (RPOs) 9.1-9.6 of the RSES require local authorities to ensure the *“integration of age friendly and family friendly strategies in development plans...including provision for flexible housing type and tenure, including social and affordable housing and explore new models of low-cost rental and affordable homeownership.”*

The Assembly welcomes the City Edge International Best Practice Housing Review conducted in 2022 to provide an evidence base for fostering diverse sustainable communities and liveable neighbourhoods within the City Edge Project. The Assembly considers that the recommendations of the research should be used to inform the implementation of the City Edge SURF, with periodic monitoring to ensure that best practices are established and replicated. SDCC should ensure that these recommendations are considered in light of the most recent available data, including Census 2022.

3.3.7 CE Response:

The Assembly's comments in regard to housing are noted. Within section 2.8 Housing, The City Edge SURF makes reference to the Best Practice Housing Review conducted in 2022 which provides detailed assessment of the

components required for a liveable city and developed a 'Liveable City and Liveable Housing Matrix'. This Matrix was used in the evaluation of international selected case studies, comparative in terms of city characteristics or similar tenure structure to the City Edge area.

The recommendations on densities for liveable neighbourhoods, in addition to the relationship of density with height, informed the objectives of sustainable compact urban form and land use within the Strategic Framework (2022) which is carried forward to this SURF through the objectives falling under Policy HOU 1: which seeks to *"Promote residential development within the City Edge Priority Development Areas that supports quality placemaking and sustainable communities"*.

In regard to monitoring delivery, it is important to note that the SURF is an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 apply unless otherwise stated in the SURF (p.6).

Chapter 12 of the Development Plan Implementation and Monitoring is therefore applicable to the City Edge SURF. Section 12.12.5 sets out the monitoring framework under which the City Edge SURF will sit. The monitoring framework sets out under CS2 City Edge Regeneration Lands that monitoring of development (key performance and data sources) will be carried out through the Development Management process while all other monitoring aspects of the SURF will be carried out where applicable under each of the Chapter headings and monitoring sources set out within the County Development Plan.

While the above should be noted, the observations of the OPR have been taken into consideration and it is considered reasonable to add clarity within Chapter 4 of the City Edge SURF in regard to monitoring. In this regard it is recommended that wording be inserted after Section 4.4 under the heading 'Monitoring' which clarifies that the Monitoring Framework from the Development Plan as set out in Section 12.12.5 shall apply to the City Edge SURF.

CE Recommendation:

See recommendation arising from section '2.6 Implementation and Monitoring' arising from the OPR Submission.

3.3.8 Social Infrastructure:

The Assembly expresses strong support for multi-agency planning of schools, healthcare and community facilities including the urban schools model and the co-location of services such as arts facilities with other infrastructure such as libraries and enterprise centres within the three PDAs and commends the innovative proposals for the provision of social infrastructure within the SURF.

The Assembly recommends that structured collaboration with service providers is ongoing to ensure timely and integrated infrastructure delivery.

CE Response:

The Assembly's comments in regard to social infrastructure provision with the City Edge SURF and the importance of collaboration in delivery are noted and welcomed. Chapter 4 Phasing and Implementation of the SURF sets out the phasing schedule for the development of each of the PDAs which aims to ensure required infrastructure, facilities and amenities are provided in tandem with new residential and employment development.

CE Recommendation:

No change to draft plan.

3.3.9 Economic Development and Employment:

The Assembly welcomes the Economic Analysis Study which informed the City Edge Project and acknowledges the aims of the SURF Economic Strategy to retain existing industry, develop enterprise and innovation spaces and develop growth sectors across the short, medium and longer term. The Assembly supports alignment with the RSES Economic Strategy, the National Smart Specialisation Strategy and the Dublin Regional Enterprise Plan to 2024 which outlines ICT, Financial Services, Biopharma/Life Sciences as key sectoral strengths for Dublin.

The Assembly recommends that SDCC ensures that the economic development, enterprise and innovation aspects of the final City Edge SURF is consistent with the Economic Strategy of the RSES for the Eastern and Midland Region and the South Dublin Local Economic and Community Plan.

Under the sub-heading 'Re-purposing of existing buildings and adaptability of new buildings' the Assembly identifies NPO 67 of the NPF 2025 which encourages support for circular and bioeconomy principles through re-use and refurbishment of existing buildings and structures.

It is stated that the RSES provides guiding principles on dealing with the complexities of brownfield regeneration and requires local authorities to set out measures that *"...promote the reuse, refurbishment and retrofitting of existing buildings within the urban centres"*. The Assembly welcomes the promotion of reuse, repair, adaptation and upgrading of existing buildings within the Draft City Edge SURF.

CE Response:

The items set out by the Assembly in regard to Economic Development and Employment have been noted. The strategy for employment within City Edge is to support diversification into new sectors, whilst allowing the expansion of existing established businesses and sectors (subject to the usual planning consents, environmental and amenity considerations, and Development Plan and SURF objectives). Such measures are considered to be consistent with the economic strategy of the RSES for the Eastern and Midland Region and the South Dublin Local Economic and Community Plan.

CE Recommendation:

No change to draft plan.

3.3.10 Renewable Energy:

The Assembly makes reference to national renewable energy targets (wind, solar) and regional capacity obligations and is supportive of district heating, energy efficiency and expanded solar energy generation measures.

The Regional Assembly welcomes the promotion of harnessing of waste heat for district heating and other energy efficiency measures within the City Edge SURF and encourages SDCC to further explore measures to support renewable energy generation, particularly solar energy, within the City Edge PDAs and its wider functional area. Some of the innovative approaches for solar energy generation include the use of rooftops and building façades, smart windows, community solar projects, shared solar gardens, and solar canopies in public spaces and open spaces. SDCC may also consider setting renewable energy targets for each PDA to support monitoring and evaluation.

CE Response:

The items set out by the Assembly in regard to Renewable Energy and National Renewable Energy Targets (Wind/Solar) are noted. As set out in Section 2.18 Energy, SDCC and DCC commissioned Codema (the energy agency for Dublin) to carry out an energy feasibility study in 2023/2024 which has informed the policies and objectives of the SURF. Such measures are reflected under Policies ENG1: Energy Planning, ENG2: Energy Efficiency in Buildings, ENG3: Embodied Carbon and ENG4: District Heating and the objectives falling under each of these policies

In regard to targets, it is an objective of the SURF under ENG1 Objective 2 *'To maintain a GIS-based database of low-carbon technology (energy providing) installations within the City Edge boundary. This should include information on the size, type, grid connection details (where applicable) and energy generation of each installation'*. This will allow tracking of progress toward County targets and updates to facilitate pathways to respond to future cost fluctuations and account for the proportion of identified potential that has been realised.

CE Recommendation:

No change to draft plan.

3.3.11 Implementation and Monitoring:

The Assembly acknowledges that the SURF includes an infrastructure-led phased delivery model, multi-agency governance (Steering Group) and defined infrastructure “phasing gateways”.

It is further noted that implementation is structured across the three PDAs, with a distinction made between overarching strategic infrastructure (such as BusConnects, major parks, and primary care centres) and PDA specific local infrastructure (including schools and community parks) through clearly defined "phasing gateways."

In this regard the Assembly considers that the provision allowing the Planning Authority to set aside phasing impediments if infrastructure is deemed non-essential for a specific proposal may require careful monitoring to ensure that cumulative development does not outpace the delivery of vital services.

While the SURF establishes a robust system of infrastructure-linked phasing gateways and a high-level Steering Group, it lacks a defined, robust monitoring framework to systematically evaluate delivery performance, track the cumulative impact of development against actual infrastructure capacity, or provide a transparent mechanism for reporting progress to stakeholders. The Assembly recommends the establishment of a formal Monitoring and Evaluation (M&E) Framework to be managed by the City Edge Steering Group. This framework should include KPIs, annual reporting and oversight of phasing exemptions. The Assembly also draws attention to the Regional Development Monitor as a supporting tool.

CE Response:

In regard to monitoring, it is important to note that the SURF is an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 apply unless otherwise stated in the SURF (p.6).

Chapter 12 of the Development Plan Implementation and Monitoring is therefore applicable to the City Edge SURF. Section 12.12.5 sets out the monitoring framework under which the City Edge SURF will sit. The monitoring framework

sets out under CS2 City Edge Regeneration Lands that monitoring of development (key performance and data sources) will be carried out through the Development Management process while all other monitoring aspects of the SURF will be carried out where applicable under each of the chapter headings and monitoring sources set out within the County Development Plan.

While the above should be noted, the observations of the Assembly and OPR have been taken into consideration, and it is considered reasonable to add clarity within Chapter 4 of the City Edge SURF in regard to monitoring. In this regard it is recommended that wording be inserted after Section 4.4 under the heading 'Monitoring' which clarifies that the Monitoring Framework from the Development Plan as set out in Section 12.12.5 shall apply to the City Edge SURF.

CE Recommendation:

See recommendation under the OPR submission Section 2.6 Implementation and Monitoring.

3.3.12 Environmental Assessments:

The Assembly recognises the content of the SEA, AA and SFRA comprising environmental reports forming part of the draft SURF. The following comments are set out under each topic as follows:

- **SEA** – The Assembly recognises the context of the Strategic Environmental Assessment and the conclusion that no specific additional mitigation measures are required for the proposed Variation because environmental protection is fundamentally integrated into the SURF's design and is robustly supported by the existing policies of the South Dublin County Development Plan 2022-2028, which will ensure no adverse impacts occur at a strategic scale.
- **Appropriate Assessment** – The Assembly notes that the NIR reviewed the potential impacts arising from the SURF and found that, without the implementation of mitigation measures, the SURF will have the potential to impact upon the Conservation Objectives of five European Sites and their relevant qualifying features that occur within the zone of influence of the SURF. Section 9 of the NIR outlines the environmental safeguards within the

South Dublin County Development Plan (CDP) and existing best practice guidelines that will be applied for all land use activities supported by the SURF. The Assembly recommends full application of these safeguards in line with the objectives of the South Dublin CDP to minimise and/or eliminate potential impacts associated with any future land use activities supported and facilitated by the SURF and thereby protecting these sites from potential adverse impacts.

- **Strategic Flood Risk Assessment** – The Assembly notes that the SFRA carried out for the proposed Variation followed a staged methodology in compliance with the 2009 National Planning Guidelines and that in adopting a sequential approach to land-use planning, the Assessment applied and successfully satisfied the plan-making Justification Test for development within the identified PDAs. The SFRA ultimately concludes that the City Edge SURF provides a robust framework for managing flood risk through integrated policies such as mandatory site-specific assessments, Sustainable Drainage Systems (SuDS), and the protection of riparian corridors, which ensure that regeneration does not cause unacceptable adverse impacts. This assessment is considered a live document that will be iteratively updated as more refined data becomes available from the ongoing Camac Flood Alleviation Scheme.

CE Response:

The submission's content in regard to Environmental Reports is noted. Environmental safeguards within the CDP and existing best practice guidelines will be applied for all land use activities supported by the SURF.

CE Recommendation:

No change to the Draft Plan

3.3.13 Overall Summary and Conclusion:

The Assembly submission concludes with a re-cap/summary of the content set out in the main body of the submission relating to recommendations and observations. The submission concludes by acknowledging the proactive approach

and extensive preparatory work that SDCC has undertaken in collaboration with the project team for the draft City Edge SURF and commends SDCC for its comprehensive approach.

The Regional Assembly welcomes further opportunities to engage in the next stages of plan making and notes that officials of the Assembly are available to discuss any of the matters raised above.

CE Response:

The submissions conclusion is noted.

CE Recommendation:

No change to draft plan.

Section 4: General Submission Summaries and Chief Executive Responses and Recommendations

Support SURF		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-3: Patrick Butler SD-C418-5: Panda SD-C418-11: An Post SD-C418-12: Cian McGuire SD-C418-13: Eastern and Midland Regional Assembly SD-C418-15: Action Community and Enterprise CLG	A number of submissions expressed support for the City Edge SURF including its vision and objectives. Others expressed support for specific policies and objectives. Regeneration of the City Edge area in general is welcomed within many of these submissions. A number of submissions express broad support for the proposed variation, recognising the SURF as a positive and necessary framework for regeneration and acknowledging its importance in addressing housing needs. Dublin City Council, as a partner in the City Edge project, notes that the SURF will provide a statutory context for the short- to medium-term development of the area within SDCC's jurisdiction, contributing to achieving the long-term vision of the City Edge project.	CE Response: The CE welcomes expressions of support for the Draft City Edge Strategic Urban Regeneration Framework. The Planning Authority welcomes the support of City Edge as a positive and necessary framework for regeneration and acknowledges the submission from DCC as a partner in the City Edge Project and considers the cross-boundary collaboration as essential to the successful delivery of the City Edge area as a sustainable, well-connected urban quarter. CE Recommendation: No change to draft plan.

<u>SD-C418-16: Greenogue Management</u> <u>SD-C418-17: Inland Fisheries Ireland</u> <u>SD-C418-19: Reddy Architecture + Urbanism</u> <u>SD-C418-20: Mashup Property Limited</u> <u>SD-C418-21: Uisce Éireann</u> <u>SD-C418-22: Dublin City Council</u> <u>SD-C418-23: Stephen Little and Associates</u> <u>SD-C418-24: Proinsias Mac Fhlannchadha</u>		
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<u>SD-C418-25: Oversight Property Consultants</u> <u>SD-C418-26: Office of Public Works</u> <u>SD-C418-27: Greyhound Recycling</u> <u>SD-C418-29: Guestford Limited</u> <u>SD-C418-30: C. Duffy Properties</u> <u>SD-C418-31: Development Applications Unit</u> <u>SD-C418-32: Department of Education and Youth</u> <u>SD-C418-33: The Land Development Agency (LDA)</u>		
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<u>SD-C418-35: Electricity Supply Board</u> <u>SD-C418-37: B&G Ltd</u> <u>SD-C418-39: Anto Mar</u>		
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Movement		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-1: David Barton SD-C418-2: Seamus Reilly SD-C418-3: Patrick Butler SD-C418-6: John Sheils SD-C418-8: Transport Infrastructure Ireland SD-C418-9: Dara Magee SD-C418-15: Action Community and Enterprise CLG	One submission supports the Chestnut Road extension to improve traffic flow from Oak Drive and reduce congestion on the Naas Road, while noting inconsistencies in road classification within the plan documents. A number of submissions raise concerns about insufficient road and public transport capacity leading to congestion, noting that current provision is inadequate and that transport infrastructure should be assessed in advance of development. An emphasis is placed on the need to maintain the operation and safety of the M50 and N7 (TEN-T Core Network), recommending that the SURF be amended to better protect the strategic road network while supporting a transit-focused approach and wider planned transport investment. While acknowledging existing and proposed public transport access, capacity shortfalls are highlighted, particularly along Spine D, and note that the SURF does not adequately address transition-stage transport impacts, including conflicts between commercial and active travel or	CE Response: The support expressed for the proposed extension of Chestnut Road is acknowledged and the inconsistencies in road classification is duly noted. It is contended that this is related to a minor typographical error in the illustration of some maps/figures. The concerns raised in the submissions are acknowledged. The City Edge SURF explicitly recognises that the successful regeneration of the City Edge area depends on delivery of several pieces of strategic infrastructure and the same is repeated throughout the phasing strategy which requires that development does not progress beyond specified floorspace thresholds until identified infrastructure elements are progressed. The lands are already noted as being well-served by existing public transport infrastructure including the Luas Red Line, commuter rail services and bus routes, while also being well located with respect to

SD-C418-22: Dublin City Council SD-C418-27: Greyhound Recycling SD-C418-37: B&G Ltd SD-C418-40: Michael O'Reilly	nearby planned housing. The importance of strong connectivity, especially last-mile links between enterprise areas and public transport, is also stressed. The submissions also address active travel and local movement, recommending that kissing gates be avoided as they restrict cycling, and proposing a cycle/pedestrian bridge over the M50 (e.g. Walkinstown to Ballymount Park) to improve safe access to Tallaght and Clondalkin, alongside recognition of BusConnects and wider walking/cycling infrastructure in areas such as Greenhills. Additional concerns include potential increased costs from relocating waste infrastructure, overly restrictive retail parking standards, and inconsistencies such as references to Orbital and Kimmage Luas without supporting documentation, while also supporting improved transport linkages along arterial routes and minor measures such as clearing vegetation from railway lines.	the national road network including the M50 and N7. However, the SURF also acknowledges that additional major infrastructure elements will be required to serve the lands and integrates these into the delivery strategy. In this regard, the SURF promotes a transition to more sustainable modes of transport by promoting active travel measures, improved public transport and reducing reliance on vehicular movements, aligned with a transport-oriented development approach. Public transport capacity is addressed through alignment with the GDA Transport Strategy 2022–2042, including BusConnects, DART+ South West and Luas expansion, with development phased in relation to delivery of public transport projects. Transport modelling also forms part of the evidence base to identify future pressure points on the network and inform the need for further investment in transport infrastructure. The importance of connectivity and safety across the wider transport network is reflected in the movement strategy, which promotes a permeable pedestrian and cycling network, connectivity between key destinations, and improved integration with public transport. Specific interventions such as the delivery of a safe pedestrian and cycle bridge at
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		the Naas Road/ Long Mile Road/Nangor Road Junction are already identified, alongside provision for greenways and active travel routes including the Tymon to Phoenix Greenway. The SURF also recognises the need to manage development alongside existing uses, with policies to integrate new development with existing land-uses both within City Edge and in the surrounding area and avoid piecemeal development, while ensuring that infrastructure, services and amenities are delivered in advance of and in tandem with population growth. This includes facilitating mixed use residential and employment communities, through sustainable higher density urban forms, served by high-quality public transport and active travel links. The Strategy acknowledges the importance of both existing and planned transport infrastructure across the PDAs, which are selected based on criteria including <i>inter alia</i> public transport accessibility (existing and planned) and proximity to infrastructure and services. Proposals such as additional orbital public transport routes and Luas extensions are identified as longer-term interventions, including the need to progress the delivery of inner and outer orbital public transport routes within the City Edge area and it is recognised
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		that such infrastructure will support the full build-out of the area. Lastly, it is important to note that the SURF is an appendix to the South Dublin County Development Plan 2022–2028 and the objectives of the County Development Plan 2022–2028 apply unless otherwise stated in the SURF. With regards to the proposed protection of the M50 and N7, attention is drawn SM6 Objective 4 of the South Dublin County Development Plan 2022 – 2028 which seeks <i>“To maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012), the Trans-European Transport Networks (TEN-T) Regulations and with regard to other policy documents such as the TII M50 Demand Management Report 2014 and the N4 and N7 Corridor Study 2017”</i>. The inclusion of an additional policy/section in this regard would only result in the duplication of already well-established policies. CE Recommendation: Amendment to Figures 5 and 21 and their respective legends and any resultant maps/figures to correctly illustrate the classification of roads.
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		Refer to <i>Section 5: Proposed Amendments to Maps</i> below, which outlines the revised maps/figures and associated details.
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Parking		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-1: David Barton SD-C418-11: An Post SD-C418-37: B&G Ltd	A number of submissions broadly argue that the proposed parking standards are too restrictive and should be revised to better support retail viability, essential services, and user needs. There is concern that reduced parking, particularly for larger retail units, may discourage development and fail to reflect how customers, especially those undertaking bulk shopping or with limited mobility, rely on car access. They also call for greater flexibility in parking policy, particularly for essential services such as postal and logistics operations, where operational fleet parking, staff parking, and customer access are critical and should be treated separately from standard caps. Overall, these submissions seek a more adaptable approach that supports economic activity, operational requirements, and future growth, while still accommodating shared parking where appropriate.	CE Response: The concerns raised regarding the potential impact of reduced parking standards on retail viability, customer access and operational requirements are acknowledged. The SURF does, however, provide a more flexible and responsive approach to parking than is suggested in the submissions, particularly in the short- to medium-term. Firstly, while the SURF sets a long-term objective of transitioning toward a low-car and more sustainable urban environment (including a “near car-free” approach in the ultimate build-out scenario (p.41)), this is explicitly linked to the delivery of public transport and supporting infrastructure and is not intended to apply rigidly at early stages of development. In this regard, the SURF: Allows higher levels of parking provision in early phases, including temporary surface

		parking where required prior to the delivery of public transport, subject to integration into future development (Policy MOV5 Objective 1); • Requires that parking provision be assessed on a case-by-case basis, having regard to accessibility, proximity to services, mobility hubs and development context (p.58 'Criteria for Appropriate Quantum of Car Parking'); This ensures that development is not constrained where reliance on car access remains necessary, including for retail and service uses, particularly before public transport access is improved. With respect to retail, the SURF also recognises that different retail formats have different access requirements: • Retail warehousing and bulky goods retail, where car-based access is more critical, are directed to locations outside local centres with good road connectivity (pp.75, 76, and Policy LCR1 Objective 6 on p.77); • Provision is made for on-street parking and short-stay access to support accessibility and customer activity within centres (p.56);
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		In terms of operational and essential services, including logistics and postal functions, the framework: • Provides for servicing, loading/unloading, disabled access and EV parking as part of overall parking standards (p.60); • Supports logistics, warehousing and distribution uses in locations with proximity to national and regional road networks (pp.78–82); Furthermore, the SURF promotes shared and adaptable parking solutions, including shared parking buildings and unassigned spaces, which are designed to accommodate a range of users while allowing flexibility over time and potential future re-purposing (pp.55–56). Overall, the SURF does not seek to unreasonably restrict parking in a manner that would undermine retail or operational viability. Rather, it provides a phased, flexible and use-responsive framework, ensuring that parking provision can accommodate current needs while supporting a gradual transition to more sustainable travel patterns as infrastructure is delivered. CE Recommendation:
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		No change to draft plan.
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Housing		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-1: David Barton SD-C418-2: Seamus Reilly SD-C418-19: Reddy Architecture + Urbanism SD-C418-20: Mashup Property Limited SD-C418-22: Dublin City Council SD-C418-27: Greyhound Recycling SD-C418-37: B&G Ltd	Several submissions support the delivery of housing within the City Edge Area, with one stating that the SURF will enable high-density residential development leading to vibrant, sustainable neighbourhoods, and another noting that housing is already being delivered through current developments in the area. One submission cites the National Planning Framework to argue that higher densities are required to address unmet housing needs in Dublin, expressing concern that current numerical standards may undermine housing delivery. A separate submission promotes an alternative architectural approach, advocating symmetrical parallel construction with individualised, authentic buildings in order to support equal opportunity to live in historic style housing. Another submission supports housing delivery in principle but raises operational design requirements, recommending that all new high-density and apartment developments provide a minimum three bin service arrangement, with	CE Response: The submissions supporting increased housing delivery are noted. The City Edge SURF seeks to promote new mixed use residential and employment communities, through sustainable higher density urban forms, aligned with compact growth objectives and higher density uses at scale. Such development is to be served by high-quality public transport and active travel links and delivered in tandem with infrastructure. The phasing strategy ensures that development is aligned with infrastructure provision in advance of and in tandem with population growth, with Priority Development Areas selected based on <i>inter alia</i> public transport accessibility (existing and planned). The SURF promotes a mix of land uses including residential, employment, and community use, and seeks to facilitate employment in mixed use

	adequate internal and external storage, compliant collection access, and waste presentation consistent with WERLA requirements, to be considered at the design stage. One submission proposes a refinement to Policy PDA5, suggesting that where the policy is applied to immediately adjacent lands, the Planning Authority should have regard to the suitability of land use changes to provide accommodation and seek to avoid uses that would conflict with the residential-led character of the adjacent PDA. A further submission references an economic and commercial viability assessment of the Concorde Industrial Estate, which concludes that Build to Rent residential development is the most viable and in demand use for the site. The report argues against large office led development, citing weak demand in Dublin's west suburbs, including high office vacancy rates and low office take up, and recommends that retail uses be ancillary only, serving residents rather than operating as a standalone destination, reflecting changing retail patterns driven by online shopping. The report concludes that the Naas Road lands are better suited to high-quality Build to Rent residential development with supporting commercial and	contexts, ensuring balanced, sustainable development rather than single-use outcomes. Dwellings per hectare or beds per hectare is a useful measure of density where development is predominantly residential. Development within City Edge will, however, be mixed use throughout with varying levels of emphasis in different locations on residential use, employment use, local centre, industrial use, etc. Plot ratio has been used as a measure of density for the City Edge SURF as it is a better metric for density in mixed use scenarios. Design-related submissions are noted. The SURF provides flexibility in urban form while promoting compact, attractive and sustainable mixed-use places with strong identities, and requires development to integrate with existing land-uses and avoid piecemeal development, ensuring appropriate transitions and protection of residential amenity. With regards to waste management, attention is drawn to Policy IE7: Waste Management of the South Dublin County Development Plan 2022 – 2023 which sets out the implementation of European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and waste. It is important to note
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	amenity uses, rather than large scale office schemes.	that the SURF is an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 apply unless otherwise stated in the SURF The submission referencing an economic and commercial viability assessment of the Concorde Industrial Estate is acknowledged. Policy HOU1 Objective 2 seeks ‘to ensure that all new residential development in City Edge is of high-quality design, offers a choice of housing tenures, types and sizes, and promotes universal design and aging in place, thereby supporting mixed and balanced communities.’ It is expected that Build to Rent will have an important role to play within City Edge, along with other tenure types, as the area is built out over time. Overall, the SURF provides a framework to deliver housing alongside infrastructure, employment and services, supporting the creation of a connected, green and inclusive new mixed use urban quarter. CE Recommendation: No change to draft plan.
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Employment		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-11: An Post SD-C418-15: Action Community and Enterprise CLG SD-C418-33: The Land Development Agency (LDA)	Safeguarding Existing Services and Uses A number of submissions have raised the issue of facilitating the continued operation of existing uses, during infrastructure delivery, as land use intensifies or transitions, and avoiding displacement or operational constraints that could undermine service delivery. The reliance of households, businesses, and vulnerable groups on uninterrupted postal services should be acknowledged. The draft SURF and all subsequent planning and development phases should recognise the need to safeguard the operational integrity of existing facilities within the City Edge area, facilitating their continued operation as land use intensifies or transitions. Clarity is also requested in regard to the timelines for the redevelopment of the area.	CE Response: Accommodation of existing adjoining land uses and operations will be taken into account in the context of assessment of planning applications. Individual planning permission for redevelopments will contain a condition requiring submission of a construction management plan which will include avoidance and mitigation of impacts on adjoining sites during the construction period. It is the role of the infrastructure agencies to liaise with existing businesses regarding continuity of operations during infrastructure delivery. It is noted that any development coming forward within the City Edge area will be subject to the standard planning application process, through which conditions relating to construction management, traffic management, and the maintenance of access to existing operational facilities can be applied where appropriate.

		SDCC will continue to engage with service providers in an ongoing manner to allay any operational concerns. It would not be appropriate for the SURF to specifically recognise individual services (such as postal services) as there are many other services located within the area. Specific timelines cannot be provided for redevelopment as there are many factors that could influence this, including market considerations, Government incentives, individual site circumstances, etc. It should be noted that the redevelopment process is ongoing on some sites within City Edge including pre-planning engagement, current planning applications, recent grants of permission and recent construction. Sites within PDAs are expected to come forward for redevelopment within the next 15 years. CE Recommendation: No change to draft plan.
<u>SD-C418-20: Mashup Property Limited</u>	Supporting Existing and Promoting Future Employment Support expressed for the objective to deliver growth of employment, in principle. The retention	CE Response: The Overarching Strategic Objective of the SURF regarding employment is to 'facilitate employment in mixed use contexts along with intensification and

<u>SD-C418-23:</u> <u>Stephen Little and Associates</u> <u>SD-C418-27:</u> <u>Greyhound Recycling</u>	of existing employment and industrial activity should form a key consideration in the implementation of the SURF and long-term regeneration strategy for City Edge. Suggested amendment to Policy PDA5 ‘Extension to and Change of Use of Existing Premises outside a PDA’ by addition of a new objective (see below) to favourably consider proposals regarding existing buildings which include productive uses and facilities to support workforce within a PDA and for temporary permissions, to take account of economic viability. <table><tr><th>Proposed Revision</th></tr><tr><td>PDA5 Objective 3: Supporting role of Adjacent Lands</td></tr><tr><td><i>In applying Policy PDA5 to lands immediately adjacent to a Priority Development Area, the Planning Authority will have particular regard to:</i></td></tr><tr><td> a) <i>The role such lands can play in supporting the delivery of the adjacent PDA;</i> b) <i>The suitability of such lands for changes of use that provide accommodation, services or facilities serving the PDA’s residents and workforce;</i> </td></tr></table>	Proposed Revision	PDA5 Objective 3: Supporting role of Adjacent Lands	<i>In applying Policy PDA5 to lands immediately adjacent to a Priority Development Area, the Planning Authority will have particular regard to:</i>	a) <i>The role such lands can play in supporting the delivery of the adjacent PDA;</i> b) <i>The suitability of such lands for changes of use that provide accommodation, services or facilities serving the PDA’s residents and workforce;</i>	diversification into emerging sectors while protecting the existing employment function of City Edge’. Therefore, accommodating existing employment uses is a key part of the land use strategy. Policy EMP1 ‘Employment’ contains objectives to support existing employment generally (objective 2); and to support existing businesses wishing to remain within the City Edge area and expand in their current location (Objective 1). There are recent examples within the area of industrial uses that have been granted planning permission for expansion within their current location, including within Priority Development Areas. Target employment floorspace and job numbers are set out for each neighbourhood within a PDA, with individual developments expected to deliver a pro-rata amount. Section 2.11 ‘Employment’ sets out criteria for employment uses in proposed developments within City Edge. Sites under 1 ha must demonstrate no net loss of non-residential floorspace compared to the existing situation on site. Reduced provision (for all site sizes) is only allowed in certain prescribed circumstances.
Proposed Revision						
PDA5 Objective 3: Supporting role of Adjacent Lands						
<i>In applying Policy PDA5 to lands immediately adjacent to a Priority Development Area, the Planning Authority will have particular regard to:</i>						
a) <i>The role such lands can play in supporting the delivery of the adjacent PDA;</i> b) <i>The suitability of such lands for changes of use that provide accommodation, services or facilities serving the PDA’s residents and workforce;</i>						

	<i>c) The desirability of avoiding uses that would conflict with the long-term residential-led character of the adjacent PDA;</i> <i>d) The need for such uses to comply with applicable amenity, environmental, and operational standards;</i> <i>e) Where temporary permission is sought, the Planning Authority shall have regard to the economic viability of the proposed use and long-term implementation horizon of the SURF in determining the appropriate duration of such permission.</i> Suggested amendment to Policy RPB1 by addition of a new objective (see below) to favourably consider proposals regarding existing buildings which include productive uses such as small-scale employment generating uses. It is suggested that economic viability of proposed uses be considered where temporary permission is sought. Proposed Revision RPB1 Objective 5: Productive Uses During the Implementation Period	With respect to the proposed additional objective 'Supporting Role of Adjacent Lands', it is considered that policy PDA5 and the SURF in general, already provide for the detailed scenario set out in proposed new Objective 3 and that such developments/uses would already be acceptable in principle subject to assessment at planning application stage. An additional objective as proposed would result in an inconsistent and unnecessary level of detail regarding one particular scenario. With respect to the proposed additional objective, 'Productive Uses during the Implementation Period', it is considered that Policy RPB1 "To support the retention, renovation and reuse of existing buildings, as opposed to demolition and new build, where appropriate" and other policies and objectives within the SURF already provide for the detailed scenarios set out and would not preclude such uses, subject to assessment of individual planning applications. The proposed change is therefore considered unnecessary. CE Recommendation: No change to draft plan.
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	<i>To favourably consider proposals for the productive use of existing buildings on REGEN-zoned lands during the SURF's implementation period, including small-scale employment-generating uses such as light workshop, studio and office use, workforce accommodation serving construction and infrastructure programmes active within the SURF area, and small-scale essential services such as creche and childcare provision and primary healthcare, where such proposals:</i> <i>a) Are compatible with long-term development potential of the landholding;</i> <i>b) Serve the needs of existing residents and workers in the wider area;</i> <i>c) Do not involve material alteration of the external built form;</i> <i>d) Are consistent with Policy PDA 5 where lands are situated outside a PDA; and</i> <i>e) Where temporary permission is proposed which meets the above guidelines, the planning Authority shall have due regard 'to long-term implementation horizon of SURF, the economic viability, and social and community uses.</i>	
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<u>SD-C418-16: Greenogue Management</u> <u>SD-C418-23: Stephen Little and Associates</u> <u>SD-C418-25: Oversite Property Consultants</u> <u>SD-C418-27: Greyhound Recycling</u>	Relocation of Existing Businesses Opportunity must be provided in the County for the hundreds of small unit occupiers (owners and tenants), to relocate from the City Edge area. There is an identified need to zone land to provide these smaller units, particularly units less than 10,000sq ft [c. 929sqm] in size. Greenogue Business Park is the best example, in fact the only example of scale, in the County over the past 25 years where these units have been delivered. A variation to the development plan should be initiated immediately to allow for the expansion of the Greenogue complex. Such a variation should be made in a way that specifically targets the delivery of small units and open yards. Concern at the absence of a clear strategy regarding the retention of and support for existing industrial and employment uses by way of land use zoning provision to facilitate future relocation to viable, accessible lands. In the absence of realistic relocation opportunities within South Dublin County, there is a risk that both the business and associated employment activity could be displaced outside the county.	CE Response The significant employment requirements of the SURF will result in substantial provision of flexible unit types and sizes, as set out in Policy EMP1 Objective 8. Smaller units will be particularly suitable for locations within mixed use contexts including residential and local centre areas. As well as providing space for new businesses, these units will provide significant relocation opportunities for existing operations within and outside City Edge. Specific proposals to rezone land outside the SDCC City Edge area (such as suggested for Greenogue) is not something that can be considered as part of the current Variation process to incorporate the SURF as part of the South Dublin County Development Plan. Regarding locations for industry that are less suitable for mixed use contexts, it should be noted that the spine of 'Enterprise and Employment' zoned land running parallel to the M50 will remain an industrial area and will facilitate the continuation of more traditional industrial type employment in the area, with scope for intensification and upgrading where appropriate. Policy EMP1 Objective 10 seeks 'to promote a regional approach to the zoning of land for
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	This concern is particularly acute for established industrial lands such as the Colas Bluebell site, and other EPA-licensed or Seveso-related operations which require large, appropriately zoned and serviced lands. The proposed variation also does not provide meaningful incentivisation or transitional mechanisms to facilitate relocation. In the absence of available lands, planning certainty or financial support, there is insufficient practical incentive for established industrial lands and businesses including Colas Bitumen Emulsions (East) Ltd site to relocate. The subject lands are located outside a Priority Development Area (PDA), and are identified as residential-led mixed-use, which ultimately does not easily accommodate more traditional industrial uses. Furthermore, few business parks, of the sort envisaged for the employment-led mixed use regeneration zones, would allow more traditional industry and manufacturing uses to relocate to their lands. Where are businesses to relocate to facilitate the implementation of the City Edge SURF? Currently there are very limited options for these businesses. The long-term relocation option for businesses needs to be promoted by SDCC providing clarity and alternatives on where new EE/industrial zoned lands will be located. The lack of EE/industrially	industrial purposes to facilitate the relocation of existing industrial uses from City Edge and other brownfield regeneration areas to less central locations.' Reflecting this objective, it is the intention of SDCC to engage with EMRA and adjoining local authorities in the eastern region with a view to managing the issue of displacement of brownfield uses by redevelopment, on a regional basis. This will include consideration of rezoning of additional lands within and outside the County, particularly to accommodate more traditional industrial uses which may not be suitable for mixed use contexts. CE Recommendation: No change to draft plan.
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	zoned lands is a major hindrance to progressing City Edge. Different options will be required for the existing diverse industrial uses. Many businesses within the Regen zoned lands have invested heavily over many years in their facilities. This investment includes financial costs, planning permissions and environmental licencing. How does the City Edge SURF stimulate the relocation of these businesses when the costs to relocate are prohibitive in terms of time and money? This is an issue that SDCC will need to resolve to encourage progress of the City Edge SURF. How businesses can overcome the costs of relocation is not set out in the plan. Relocating operations may impact business viability and result in the loss of employment, circa 200 jobs. Waste management businesses are heavily tied to their locations due to specialist operational infrastructure.	
<u>SD-C418-16: Greenogue Management</u> <u>SD-C418-19: Reddy Architecture + Urbanism</u>	Employment in Mixed Use Contexts Notwithstanding the laudable ambition to provide for employment opportunities in the redeveloped area, it is obvious that the nature of the current space, and types of business therein, will not sit well with residential development.	CE Response: The flexible mixed-use model has been proposed by the City Edge SURF taking into consideration advice from economic consultants Avison Young and urban design consultants Maccreeanor Lavington. This provides for a variety of mixes of complementary uses, which has worked well in

<u>SD-C418-25: Oversight Property Consultants</u> <u>SD-C418-33: The Land Development Agency (LDA)</u>	While a portion of the 440 ha within SDCC will be retained as EE Employment Use /industrial zoned lands the majority of the 440 ha are REGEN zoned lands. Most of the existing industrial use lands and businesses are not compatible with residential-led regeneration proposed under City Edge. The submission references a report evaluating the economic and commercial viability of Concorde industrial estate. The report emphasises that Build to Rent is the most viable and in-demand use for the site and details the reasons for this. The report argues against large office-led development on the site, with details and statistics relating to Office vacancies, and office take up in the West Dublin to support this argument (demand for large-scale office development in Dublin's west suburbs is weak, with high vacancy rates and low office take-up in the area). Retail on the site should be ancillary only, supporting residents rather than functioning as a standalone retail destination, the reason for this being that the retail market is changing due to online shopping trends. The report concludes that the Naas Road lands are better suited to high-quality Build-to-Rent	urban contexts in the UK and Europe. Examples of such mixed-use development areas include King's Cross, Millenium Mills and Segro V-Park Grand Union, all in London; SOAR Works in Sheffield; Le Trapeze in Paris; and Zuidas in Amsterdam. Sandyford in Dublin also incorporates a mix of employment, residential and commercial uses. Urban workspaces are eminently suitable for a mixed-use context, including along with residential, while urban/light industry can also work well alongside residential and community uses, providing any impacts are avoided or mitigated. The points regarding the viability of office uses are noted. Office as a use is included in the employment types envisaged in the City Edge PDAs, along with urban workspace and urban industry. Office is a higher density use that will only be appropriate in certain higher density urban contexts or as ancillary to other uses, and it is not being envisaged as a dominant employment type throughout the PDAs. It should also be noted that the SURF initially aims to promote the integration of existing established uses through EMP1 Objective 7 and the criteria set out under section 2.11 of the SURF for provision of employment uses. As the area transitions from a more industrial area to a mixed-use community with provision of supporting public transport and social
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	residential development with supporting commercial and amenity uses, rather than large office schemes. Concern is expressed regarding policies requiring replacement of non-residential floorspace, seemingly on all sites within the SURF boundary. It will not always be possible, viable, or preferable to provide such a mix of uses, in particular on sites less than 1ha where there must be no net loss of non-residential floorspace, or to replicate existing non-residential floorspace across larger sites, that could function more appropriately at a residential neighbourhood scale, rather than mixed-use to that extent. Noting the sub-zoning areas of residential or employment-led mixed-use areas, it is considered that it may be more appropriate for the replacement of non-residential floorspace be more focused on areas envisaged as being employment-led mixed-use. This would allow for more targeted concentrations of non-residential uses, while allowing flexibility for non-residential uses included on residential-led mixed-use sites.	infrastructure it is envisaged that the area will become more attractive to office uses creating a more economic and commercially viable proposition. Outside of local centres, retail will generally be ancillary to other uses such as residential and employment. The overarching strategic objectives of the SURF in relation to employment is to 'facilitate employment in mixed use contexts along with intensification and diversification into emerging sectors while protecting the existing employment function of City Edge'. In order to achieve this strategic objective, the SURF contains strong policies and objectives to protect the historic and existing employment function of the City Edge area. Residential-led mixed use (RLMU) is the dominant land use category within City Edge and comprises a much larger area than employment-led mixed use (ELMU). Reducing the employment requirement within RLMU areas would significantly dilute the aims of the SURF with respect to preserving the important employment role of City Edge into the future and creating sustainable communities where
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		people will have employment opportunities close to where they live. In addition, the draft SURF contains flexible Criteria for Employment (pp 80-81) that allow a reduced quantum of non-residential floorspace in certain circumstances including where the site has a small existing amount of non-residential; where a development includes high-value non-residential uses or high-quality commercial frontage; where the applicant delivers off-site non-residential floorspace or provides space for relocating a business within City Edge, etc. CE Recommendation: No change to draft plan.
SD-C418-15: Action Community and Enterprise CLG	Enterprise Successful delivery of the City Edge vision will depend on actively supporting and integrating the existing enterprise base which is already delivering employment, economic activity and community value. SURF should explicitly recognise the role of existing enterprise hubs as foundational assets within City Edge and explicitly include policy support for their	CE Response: Section 2.11 'Employment' sets out criteria for employment uses in proposed developments within City Edge. Sites under 1 ha must demonstrate no net loss of non-residential floorspace compared to the existing situation on site. Reduced provision (for all site sizes) is only allowed in certain prescribed circumstances. Policy EMP1 Objective 8 seeks 'to promote adaptable design for employment units which

	retention, enhancement and integration into future development. The SURF should include clear policy measures to: • Protect existing SME employment locations; • Support the intensification and upgrading of enterprise space • Ensure that redevelopment does not result in a net loss of affordable and flexible business space • Ensure that pivoting towards new industry does not detrimentally impact current industry. Ace Enterprise Park demonstrates the value of integrating enterprise activity with community uses, training and social enterprise. The SURF's objectives relating to community facilities, employment and placemaking would be strengthened by explicitly promoting this blended model.	facilitates flexible use'. This policy will support the provision of space for SMEs and enterprise space. The strong mixed-use and co-location emphasis of the draft SURF will facilitate the integration of a blend of uses including enterprise, community uses, training and social enterprise. Notwithstanding the above provisions, it is considered that a new objective should be added to Policy EMP1 to strengthen the support for enterprise in the SURF. CE Recommendation: Add new objective to Policy EMP1 as follows: <i>'To support existing enterprise operations and new enterprise activities, through the provision of flexible employment space and encouraging co-location with other uses including community facilities.'</i>
SD-C418-1: David Barton	Old Skills and Economic Benefits from Old Buildings	CE Response: Identifying specific suppliers and crafters is beyond the scope of the SURF. However, in seeking to

	New employment could be promoted through identifying and locating raw material suppliers and artisan crafters. Reconstruction Programmes can provide employment to those with craft skills. Economic benefits can be gained from “carbon-rich old builds” as they will draw wider funding to the area.	provide a significant level of employment, mixed uses that allow for employment in all land use categories (aside from natural infrastructure) and employment units that are flexible in size, it is considered that the SURF can facilitate a variety of types and scales of employment uses including small scale artisans and crafters. Policy Emp1 Objective 8 seeks to ‘promote adaptable design for employment units which facilitate flexible use’. Under Policy RPB1, the SURF has a variety of objectives supporting the reuse, repair, adaptation and upgrading of existing buildings. CE Recommendation: No change to draft plan.
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Climate Action		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-1: David Barton SD-C418-5: Panda SD-C418-7: Department of Transport SD-C418-20: Mashup Property Limited SD-C418-27: Greyhound Recycling	Repurposing of Existing Buildings and Adaptability of New Buildings A number of submissions advocate for the retention, restoration and adaptive reuse of existing buildings, retrofit of older buildings to improve energy efficiency while retaining heritage value, and advocate for reuse of construction and demolition materials and sourcing and segregation of recyclable materials on building sites, as a climate action measure. Submissions also promote traditional vernacular architecture and sustainable materials as a model for future development and recommend the undertaking of embodied carbon studies to demonstrate the climate benefits of building conservation over demolition and redevelopment.	CE Response: The Planning Authority acknowledges and welcomes the support for the repurposing of existing buildings and adaptability of new buildings, the retrofit of older buildings and reuse of demolition materials and the role of embodied carbon in supporting climate action objectives. These points are addressed within the Draft SURF, in Section 2.17, <i>Re-purposing of Existing Buildings and Adaptability of New Buildings</i>, and Section 2.18, <i>Energy</i>, which support the adaptive reuse of existing building and the efficient use of resources in the transition to a low-carbon future. CE Recommendation: No change to draft plan.
	EV Charging Infrastructure A submission requests that the Draft SURF provide for electric vehicle charging infrastructure in	CE Response: The Planning Authority acknowledges the submission and notes that the provision of EV

	accordance with the National EV Infrastructure Plan and relevant Energy Performance of Buildings requirements, recognising the provision of a comprehensive public EV charging network as a key measure in supporting Climate Action Plan targets for transport decarbonisation.	infrastructure is already supported by the Draft SURF through Policy MOV5 Car Parking and in particular by Objective 7 of this policy. CE Recommendation: No change to draft plan.
	Climate Impact on Relocation of Business The submission raises concerns that the relocation of waste management facilities may increase transport-related emissions due to longer vehicle travel distances, with potential implications for climate action objectives.	CE Response: The Planning Authority notes the concern raised. The Draft SURF does not specifically seek the relocation of existing businesses. Policy EMP1 Objective 1 supports existing employment uses and facilitates the continued operation and expansion of businesses that wish to remain in their current location, while EMP1 Objective 2 seeks to support existing employment uses and diversification into new and emerging sectors. There is also scope within the provisions of the SURF for businesses to relocate internally within City Edge. CE Recommendation: No change to draft plan.

Surface Water Management		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-17: Inland Fisheries Ireland SD-C418-21: Uisce Éireann	Two submissions support the policies and objectives relating to surface water and rainwater management, the proposed re-naturalisation, and the objectives of Policy UTL1, together with the emphasis throughout the Draft SURF on Sustainable Urban Drainage Systems (SuDS) and integrated drainage management principles. The submission recommends the establishment of a dedicated team to oversee compliance with these policies and the requirement for an independent audit of surface water management proposals at planning application stage. The submission also notes the dependency of future development on the Water Supply Project and the Greater Dublin Drainage Scheme and highlights existing constraints within the 9B sewer network, with potential solutions including sewer duplication and additional storage. Emphasis is placed on the implementation of short-term measures, including stormwater separation, the removal of infiltration and misconnections, and the delivery of SuDS.	CE Response: The Planning Authority welcomes the support for the Draft SURF's approach to surface water management, rainwater management, re-naturalisation measures, SuDS, and the objectives set out in UTL1. The recommendation to establish a dedicated team to oversee compliance is acknowledged. These matters are addressed through the existing planning application process, where detailed assessments are required and reviewed as part of the development management process. The Planning Authority recognises the dependency on the Water Supply Project and the Greater Dublin Drainage Scheme, as well as the constraints within the 9B sewer network. Ongoing coordination with Uisce Éireann will continue to ensure alignment between development and the delivery of infrastructure.

		Short-term measures identified in the submissions, including stormwater separation, removal of infiltration and misconnections, and the delivery of SuDS are addressed in the policies and objectives of the Draft SURF, in sections 2.12 Natural Infrastructure and Open Space, 2.14 Surface Water/Rainwater Management and 2.19 Utilities. CE Recommendation: No change to draft plan.
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Natural Infrastructure and Open Space		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C418-1: David Barton</u> <u>SD-C418-4: The Maritime Area Regulatory Authority (MARA)</u> <u>SD-C418-23: Stephen Little and Associates</u> <u>SD-C418-31: Development Applications Unit</u> <u>SD-C418-37: B&G Ltd</u>	Grand Canal pNHA Buffer and Camac Linear Park In terms of site-specific constraints, one submission identifies the 50m buffer to the Grand Canal pNHA as a material constraint on the redevelopment potential of its subject lands, noting that any residential-led mixed-use development would be required to set back built development from the pNHA boundary, thereby reducing the net developable area.	CE Response: The Planning Authority notes the site-specific issue relating to the Grand Canal pNHA Buffer. The Grand Canal is a proposed Natural Heritage Area (pNHA) of significant ecological and biodiversity value, recognised and protected under both the South Dublin County Development Plan 2022–2028 and proposed Variation No. 3. A 50m buffer is standard practice for development close to pNHAs (which has been arrived at in consultation with the National Parks and Wildlife Service and which has also been applied in the case of Clonburris Strategic Development Zone), in order to minimise impacts on the biodiversity, ecological, geological, and landscape value of the heritage area. The draft SURF limits the types of development that would be considered acceptable, depending on distance from the pNHA. Section 2.16 (Natural and Built Heritage) sets out the requirements for such development, including the preparation of an

		Ecological Impact Assessment, Biodiversity Management Plan, and Landscape Plan by a suitably qualified professional (as appropriate). At the time of development /redevelopment of a particular site, site-specific constraints will be assessed in full at planning application stage. Hence no change is required. CE Recommendation: No change to draft plan.
	Protection Of Wildlife A number of submissions welcome the draft SURF's emphasis on biodiversity protection and enhancement, particularly the proposed Grand Canal Park and Camac Linear Park as wildlife corridors. A submission raises concern regarding the protection of otters along the Camac system, and cautions that greenway construction can adversely impact biodiversity and recommends ecological surveys of proposed greenway routes, protection of existing holts and installation of new holts at strategic points are undertaken by qualified specialists before routes and designs are finalised.	CE Response: The Planning Authority acknowledges the support for the draft SURF's emphasis on biodiversity protection and enhancement, particularly the proposed Grand Canal Park and Camac Linear Park as wildlife corridors. It should be noted that the City Edge SURF is an appendix to the South Dublin County Development Plan 2022-2028 (CDP), where on p.91, '<i>Protection of Habitats and Species Outside of Designated Areas</i>', the Plan refers to otters stating that they are subject to strict protection under the EU Habitats Directive (92/43/EEC), including protection of

		resting and breeding places and, where possible, foraging habitats. The CDP further requires that applicants demonstrate that proposals will not have a significant adverse impact on protected species and their habitats, and that the Planning Authority will take account of the views of Prescribed Bodies and any licensing requirements in relation to protected species. In this regard, Policy NCBH5 of the CDP requires that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals. As this draft SURF is a proposed Variation to the CDP, it must be read in conjunction with the CDP and its associated policies, and any development facilitated by this Variation will be required to demonstrate compliance with the relevant policies and objectives in the CDP. Hence no change is required. CE Recommendation:
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		No change to draft plan.
	Community Park Provision Regarding green infrastructure and open space, one submission raises concerns about the indicative Community Park Location mapped partly within the subject site (also indicated in a map in the Draft SURF), stating that its incorporation would place constraints on development potential and viability. The submission requests relocation of the indicative community park and expresses willingness to provide a contribution in lieu toward a community park at an alternative location within the PDA, as this was considered acceptable in principle by the SDCC Park Department at the section 247 Pre application meeting. The submission further claims that smaller-scale biodiversity interventions on site including tree planters, rain gardens, permeable paving and resilient planting as part of the wider green infrastructure network will be incorporated.	CE Response: The Planning Authority notes the issue raised regarding the indicative Community Park location. <i>Section 2.12.4 Community Parks</i> of the draft SURF emphasises that the location is indicative in nature, and that flexibility exists regarding the precise size, location, and configuration of community park provision within Priority Development Areas. The Planning Authority acknowledges the principle of a financial contribution in lieu of on-site community park provision as acceptable in certain circumstances. The willingness of the submitter to incorporate smaller-scale biodiversity interventions on site including bio-retention tree planters, bee-bricks, rain gardens, permeable paving, and resilient planting is welcomed. Detailed assessment is carried out at planning application stage. Hence no change is required in this regard. CE Recommendation: No change to draft plan.
	Public Realm	CE Response:

	On public realm and placemaking, submissions encourage the Draft SURF to account for Dublin's climate by promoting semi-enclosed, sheltered and weather-protected public spaces capable of supporting year-round community activity, with reference to comparable European regeneration projects.	The Planning Authority notes the submission's encouragement to account for Dublin's climatic conditions in the design of public spaces within the City Edge area. The Draft SURF promotes placemaking principles for the delivery of active, attractive and inclusive public spaces. The suggestion to promote semi-enclosed and weather-protected spaces is noted as a matter of detail that can be appropriately addressed at the design and development management stage. Reference to European regeneration projects is consistent with the ambition of the Draft SURF to deliver a high-quality, urban quarter. Hence no change is suggested in this regard. CE Recommendation: No change to draft plan.
	Greening along Arterial Routes Submissions advocate for maximising greening along arterial routes through the introduction of dense tree planting and hedgerow, with financial incentives for private landowners to participate.	CE Response: The Planning Authority notes the submission advocating for dense tree planting, hedgerow introduction, and financial incentives to encourage greening along arterial routes. Policy NIO S1: Natural Infrastructure and Open Space: references street trees and places emphasis on the provision of greenways and green corridors throughout the City Edge area. It is further noted that Section 2.5. Movement includes objectives to transform arterial

		routes, including the Naas Road, into boulevard-style streets, to be progressed through ongoing engagement with the NTA and TII. Hence no change or amendment is required in this regard. CE Recommendation: No change to draft plan.
	Open Space and Recreation Concerns are raised regarding the lack of recreational spaces, with potential links to increased antisocial behaviour. The submission recognises that proposed public open spaces would have a positive impact on quality of life.	CE Response: City Edge will have significant green cover including major and linear parks, community parks, greenways, green corridors, SuDS features, street trees, and open space within developments. The Planning Authority note that on-site public open space must meet design requirements including easy access, passive surveillance, good landscape presentation, and provision of children's play facilities. There is also considerable provision within the draft SURF for sports and recreational facilities. Sports hubs are proposed where a wide range of active recreation facilities will be concentrated. Open space and sports and recreation facilities are a phasing element of the draft SURF. CE Recommendation: No change to draft plan.

	Maritime Area A submission calls for stronger environmental protection for coastal areas through additional ecological designations. MARA (the Maritime Area Regulatory Authority), as a prescribed body under the Maritime Area Planning Act 2021, confirms that the Draft SURF will not interact with or impact on the maritime area and raises no further comments within the scope of its statutory functions.	CE Response: A submission was received in relation to the protection of environmental factors along coastal areas. It is noted that City Edge has no coastal area. A further submission was also received from MARA confirming that Proposed Variation No. 3 will not directly interact with or impact on the maritime area. Hence no change is required in this regard. CE Recommendation: No change to draft plan.
	Site-Specific Recommendation Suggests a minor repositioning of the Indicative Community Park Location to avoid constraining the development potential of the Wilkins House site.	CE Response: Community Park locations within the draft SURF are indicative. Where a development site is not in a position to contribute land towards the provision of a community park or contributes less than the need that the future population would generate, there is scope for the Council to require a contribution in lieu, in accordance with the Council's Development Contribution Scheme. CE Recommendation: No change to draft plan.

Building Height		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-12: Cian McGuire SD-C418-30: C. Duffy Properties SD-C418-33: The Land Development Agency (LDA) SD-C418-37: B&G Ltd SD-C418-39: Anto Mar	Policy Wording and Flexibility: The Land Development Agency (LDA) raised concern regarding prescriptive language (e.g. “up to”) that may unintentionally impose rigid caps on development metrics. It is recommended that more flexible terminology (e.g. “circa” or “indicative”) be adopted to enable site-specific optimisation while maintaining alignment with overall plan principles.	CE Response: The draft SURF sets out how the overall approach to density and height within City Edge follows compact urban form, optimising proximity to amenities and public transport and thereby facilitating active travel. Prevailing mid-rise heights across the wider City Edge area of between 3 and 8 storeys are indicated, with lower heights and densities adjacent to sensitive areas such as existing low-rise residential development, and taller buildings and higher densities close to public transport nodes and planned local and major centres. It is considered that these approaches when taken together provide flexibility and comply with national policy. However, some amendments would provide greater clarity in this regard. Figure 9 is entitled ‘Indicative building height approach across City Edge’ while the legend contains several indicative storey heights with the wording ‘up to’. In order to clarify that building

		heights are indicative, it is considered reasonable to reiterate the words 'indicative building height' in the legend. A reference should be made under the legend clarifying that it should be read in conjunction with Policy IOD1 Objective 3 which refers to the potential for higher buildings in particular circumstances. A specific reference to 'up to 35m' in relation to the Greenhills PDA in the text on page 63 should be omitted. Equivalent residential storey heights will also be given in map legends for the purposes of clarity. CE Recommendation: 1. Amend the legend for Figure 9 on page 64 by inserting the wording '<i>Indicative Building Heights</i>'. 2. Insert text below the legend for Figure 9 on page 64 '<i>To be read in conjunction with Policy IOD1 Objective 3.</i>' 3. Delete reference to 'up to 35m' in first line of second paragraph on page 63 as follows: From: In the Greenhills PDA, taller elements of up to 35m are concentrated along the major route,
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		Calmount Road and the proposed Calmount local centre location. To: In the Greenhills PDA, taller elements of up to 35m are <i>may be</i> concentrated along the major route, Calmount Road and the proposed Calmount local centre location'.
	Height Limits: The 50 m building height limit is considered arbitrary and overly restrictive. Submissions advocate for increased height allowances, particularly for landmark developments and transit-oriented locations, to better reflect urban precedents and maximise development potential. A reduction of maximum building heights (by approximately 10 m) between previous frameworks and the Proposed Variation is criticised for reducing development capacity (e.g. loss of up to three residential floors). It is argued that blanket numerical limits are inconsistent with national Building Height Guidelines.	CE Response: The approach to building height went through an urban design led masterplanning process to set appropriate height ranges for the area, in accordance with the recommendations of Section 2.11 of the national guidelines in relation to areas which will undergo comprehensive redevelopment. The SDCC Building Height and Density Guide acknowledges that certain sites are large enough to 'define their own setting' and that 'often, such sites will have the ability to present frontages in line with prevailing heights of the existing context and layer non-thematic heights within the depth of the site'. For these purposes, the City Edge PDAs are considered 'sites.... large enough to define their own setting'.

		The City Edge building height concept takes account of the following: • National level guidance contained in 'Urban Development and Building Height Guidelines for Planning Authorities' (2018); • Local level guidance contained in section 5.2.7 of the Development Plan, which sets out policies and objectives relating to building heights, density and quality design; • Local level guidance contained in Development Plan Appendix 10, 'Building Height and Density Guide'. Heights of up to 16 residential storeys are facilitated within City Edge, with prevailing mid-rise heights of 3-8 storeys across the PDAs. There is scope in exceptional circumstances for greater heights close to public transport stops and key public spaces subject to exceptional design (Policy IOD1 Objective 3). Lower transitional heights are provided for close to sensitive locations such as existing residential areas (Policy IOD1 Objective 1). It is considered that the approach to height achieves a balance between allowing scope for intensive development in appropriate areas while respecting more sensitive areas.
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		CE Recommendation: No change to draft plan.
	Strategic Density and Transport Integration: Submissions support higher-density development near public transport corridors, noting that improved accessibility should justify increased building heights and more intensive land use.	CE Response: National guidance requires increased building height and density to be supported in urban centres and locations with good public transport accessibility. This has been the focus of the overall approach to planning for regeneration within City Edge including the identification of Priority Development Areas (PDAs) and the approach to building height. This approach complies with SPPR1 of national guidelines by identifying 'areas where increased building height will be actively pursued'. Policy IOD1 Objective 3 allows for a particular flexibility in relation to building heights in certain locations including close to public transport stops: 'To reflect the importance of placemaking, in certain circumstances and locations, such as at key public transport stops and key public spaces, flexibility in relation to the plot ratio range and the potential for higher buildings may be given. This flexibility would only apply where exceptional design is demonstrated which creates a feature of architectural interest; or where a significant contribution is made to the public realm or

		community park provision at these locations including provision of mixed uses at ground floor level.' CE Response: No change to draft plan.
	Development Metrics and Density Controls Reliance on fixed metrics such as plot ratio and height is viewed as potentially limiting and misaligned with the 2024 Compact Settlement Guidelines. Greater emphasis on site-specific assessment criteria is recommended to ensure flexibility and consistency with current national policy.	CE Response: At the neighbourhood level for each PDA in Chapter 3, a plot ratio figure for each neighbourhood is set out, which can be in the range of plus or minus 15%. Any additional divergences outside this range will be considered on a case-by-case basis as part of a planning application, subject to the criteria set out at Plot Ratio Implementation. In all cases, plot ratio is considered across the neighbourhood, and fluctuations within the neighbourhood may be appropriate if they accord with the building height concept. Plot ratios were calculated in accordance with the methodology in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.

		Policy IOD1 Objective 3 allows for particular flexibility in relation to building heights in certain locations including close to public transport stops. It is considered that these approaches when taken together provide flexibility and comply with national policy. The amendments proposed under the heading, policy wording and flexibility will also provide further clarity. CE Recommendation: No change to draft plan.
	Location-Specific Adjustments Revisions to height policies are recommended for key growth areas such as Adamstown and Clonburris, as well as local centres and gateway locations, to allow for greater flexibility and the delivery of appropriately scaled, higher-density development.	CE Response: Heights within Adamstown and Clonburris are beyond the scope of the draft City Edge SURF. CE Recommendation: No change to draft plan.

Community Facilities		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-1: David Barton SD-C418-2: Seamus Reilly SD-C418-5: Panda SD-C418-9: Dara Magee SD-C418-14: Massey Bros Funerals SD-C418-18: Basketball Ireland	Community Facilities and Heritage and the Built Environment A submission wishes to see the preservation and reconstruction of community facilities, particularly those previously located in historic or landmark buildings. It calls for meaningful community engagement in demolition decisions and stresses the importance of identifying property owners, especially for buildings used for worship prior to any demolition. A clear preference is expressed for reuse over demolition, underpinned by circular economy principles.	CE Response: The Planning Authority notes that the SDCC area of City Edge is mainly industrial in character with very limited built heritage elements. The Draft SURF contains several relevant policies including to make better use of the current building stock (ENG3 Objective 1) and to promote circularity in the design and construction of buildings (ENG3 Objective 3). CE Recommendation: No change to draft plan.
SD-C418-20: Mashup Property Limited SD-C418-22: Dublin City Council	Education Provision The Department of Education and Youth highlights the need for additional school capacity due to projected population increases. Reservations for new school sites will be sought where they are required, but expansion of existing sites is always the preference. It also calls for the protection of	CE Response: Policy SCCA1 Objective 1 commits to continue to engage with the Department of Education and Youth (DEY) regarding schools need. The phasing strategy of the draft SURF sets out school site needs based on projected population and aligns

<u>SD-C418-24: Proinsias Mac Ehlannchadha</u> <u>SD-C418-26: Office of Public Works</u> <u>SD-C418-30: C. Duffy Properties</u> <u>SD-C418-32: Department of Education and Youth</u> <u>SD-C418-37: B&G Ltd</u>	land buffers around schools to allow for expansion and notes future demand for Special Educational Needs (SEN) provision. A request for explicit support for SEN is set out. Schools are identified as central to community development and should be co-located with other amenities.	with the Department's current projection of need within the PDAs as set out in the submission. The DEY's request for buffer zones of land around schools is acknowledged. However, there are no schools within the SDCC part of the City Edge area. Notwithstanding this, allocation of buffer zones around schools is not the usual manner in which future expansion is provided for. SDCC will continue ongoing engagement with the DEY regarding all school need including future expansion of existing schools in the vicinity of City Edge as regeneration progresses. Section 2.9.1 already acknowledges special educational needs requirements. However, in acknowledgement of the DEY's request for explicit reference to special educational needs, it is considered that a reference should also be included within a policy / objective. CE Recommendation: Amend Policy SCCA1 Objective 1 as follows: From: To continue to engage with the Department of Education and Youth regarding schools need, while actively monitoring planning applications, construction activity and population growth in the
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		area, and taking into account latent capacity in existing schools in the wider area. To: To continue to engage with the Department of Education and Youth regarding schools need, while actively monitoring planning applications, construction activity and population growth in the area, and taking into account latent capacity in existing schools in the wider area <i>and special education needs requirements</i>'.
	Policy and Planning Measures Proposed amendments suggested to Policy RPB1 seek to support developments that retain existing buildings providing essential community services, including consideration of social uses in temporary permissions. The submission also emphasises the need for faster delivery of infrastructure under the Strategic Urban Regeneration Framework (SURF).	CE Response: The Draft SURF has specific policies that address the concerns raised in the submission. Policy RPB1 Objective 1 seeks 'to support the retention, renovation and reuse of existing buildings, as opposed to demolition and new build, where appropriate.' This objective would already provide for situations where essential community services are involved, and it is considered unnecessary to specify this. SCCA3 Objective 2 seeks 'to support arts and cultural meanwhile uses including the use of vacant or underutilised buildings, while ensuring that adequate permanent provision is planned for and

		ultimately delivered.' This objective would cover the eventuality of temporary permissions for social or other uses. Infrastructure delivery including community facilities is tied to a detailed phasing strategy that sets development thresholds for provision of different types of infrastructure in different locations. The Planning Authority is also working closely with infrastructure agencies to ensure provision of the necessary infrastructure in tandem with development. CE Recommendation: No change to draft plan.
	Local Services The need for essential local services is highlighted, including specific requests such as for a chapel of rest, including scope for larger such facilities. It recommends that community and cultural facilities be centrally located and easily accessible, rather than positioned in less suitable areas such as certain peripheral development zones.	CE Response: Local services including chapels of rest will be particularly suited for location within the proposed City Edge local centres. It is envisaged that these local centres will establish a viable and vibrant mixed-use range of local services and community uses, that will provide a focal point for communities. Individual proposals including for larger scale facilities as mentioned in the submission will be dealt with via the Council's development management process (planning applications, etc.)

		CE Recommendation: No change to draft plan.
	Community Facilities Locations Within the Greenhills PDA, the community/cultural facility shown on the Wilkins site on Figure 48 would better serve the wider area if it was located more centrally. This is located close to another community /cultural facility within Greenhills PDA.	CE Response: It is noted that locations for schools and community/cultural facilities are indicative which introduces flexibility allowing consideration on a case-by-case basis. Both indicative locations referred to are within the proposed Walkinstown Local Centre extension and are therefore considered appropriate settings for one or more such uses. There is also scope for alternative locations to be considered 'based on proximity to regeneration, access to public transport and catchment' (Section 2.9.2, p. 72). SCCA2 Objective 3 also provides scope for a contribution in lieu in line with the Development Contribution Scheme at the discretion of the Council. In the context of the above policy framework, it is considered that there is adequate flexibility in the provisions for community facility locations. CE Recommendation: No change to draft plan.

Sports and Recreation		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-2: Seamus Reilly SD-C418-9: Dara Magee SD-C418-18: Basketball Ireland SD-C418-22: Dublin City Council SD-C418-32: Department of Education and Youth	Active Travel Facilities A submission identifies a lack of shower facilities in small employment units as a barrier to cycling. Gym facilities and Council funded shower facilities are needed within City Edge to support active travel. It is further noted that such facilities could encourage cycling uptake and reduce peak-time traffic congestion.	CE Response: The draft SURF provides for uses such as gyms, with individual proposals being subject to application for planning permission. It is not envisaged at this moment in time that the Council would provide municipal shower facilities. However, shower facilities would be provided for service users as part of any future municipal sports facility. Mobility hubs will provide facilities to support active travel such as kiosks, lockers and toilets. CE Recommendation: No change to draft plan.
	Schools and Playing Pitches Notes policy support for locating sports hubs and playing pitches in close proximity to schools. Highlights that schools are not currently identified in proposed zoning, which may affect delivery.	CE Response: Indicative locations are shown for schools within each PDA and decisions on need will be taken in conjunction with the Department of Education and Youth. The SURF provides for playing pitches to be delivered as part of sports hubs and in parks, in addition to co-location with schools. Sports hubs

		(which will include pitches) are a phasing element for City Edge which means development cannot proceed beyond specified thresholds without provision. CE Recommendation: No change to draft plan.
	Sports and Recreational Infrastructure Basketball Ireland strongly urge SDCC to give due consideration to a municipal model of sports hub for equitable and affordable access, long-term participation and health. The number of indoor sports facilities provided should be proportionate to population growth. Emphasises the need for multi-sport, purpose-built indoor facilities, designed in consultation with governing bodies and Council engagement. A hybrid model of community and high-performance facilities is recommended to deliver social, economic, and sporting benefits. The submission calls for dedicated zoning and minimum provision standards for playing pitches and recreational spaces, aligned with projected population growth. It emphasises the need for a diverse range of facilities, including play areas, multi-use open spaces, and indoor/outdoor sports	CE Response: The Council would be pleased to engage with sports bodies regarding design and provision of future facilities. Municipal sports facilities have been developed in other parts of the County and may be considered in the future within City Edge, subject to available funding, and other Council priorities at the time. Sports hubs are an overarching phasing requirement within the draft SURF as they are considered strategic infrastructure that may serve more than one PDA or the wider City Edge area. There is also scope within the draft SURF for more local level sports facilities provision. SR1 Objective 1 supports the location of community sports hubs in local centres and adjacent to school sites while SR1 Objective 2 encourages district and regional level sports facilities as catalysts / anchors for City Edge. Policy SR1 Objective 3 provides for public transport

	amenities, strategically located near schools and public transport to maximise accessibility. Public transport access to the National Basketball Arena is poor. While supportive of the overall vision of the City Edge Plan a call for accelerated delivery of sports infrastructure is set out. Concerns are also raised in regard to insufficient sports provision with a recommendation to locate sports facilities near: • Schools • Public transport and mobility hubs • Emphasises accessibility and maximising usage • Calls for minimum pitch provision aligned with population growth	accessibility to be a consideration for locations away from local centre and school sites. Policy SR2 aims to provide playing pitches in sports hubs and parks in tandem with population growth while objective 3 of this policy seeks to ensure a wide variety of sports including minority sports are catered for. The SURF also makes provision for contributions by developers towards provision of sports hubs and playing fields in accordance with the Council's Development Contribution Scheme. It is considered that these provisions, when taken together, adequately provide for sports and recreational infrastructure. The issue of public transport access for the National Basketball Arena is noted but this issue is beyond the scope of the draft City Edge SURF. CE Recommendation: No change to draft plan.
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Heritage		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C418-31: Development Applications Unit</u>	The Department of Housing, Local Government and Heritage Development Applications Unit notes the following in relation to archaeology: Notes that the Draft City Edge Strategic Urban Regeneration Framework (SURF) includes legislation and policy context including: • Planning and Development Act, 2024 • South Dublin County Development Plan 2022–2028. Notes that the SDCC Development Plan incorporates • Strategic Environmental Objectives (SEOs) for cultural heritage aimed at protecting and managing cultural heritage assets. • Policy reference to protect cultural, archaeological, and architectural heritage (places, features, buildings, landscapes)	CE Response: The Planning Authority acknowledges the Department's submission, which notes the legislative and Development Plan policy context of the draft SURF, and which concludes no predicted impacts by the provisions of the draft SURF on any recorded monuments or archaeology within or near the SURF area. Notwithstanding this, the Planning Authority has reviewed the references to archaeological and architectural heritage contained within the Department's submission, and notes that the heritage assets identified do not fall within the boundary of the City Edge Strategic Urban Regeneration Framework (SURF) area and in some cases do not fall within the SDCC area. The Planning Authority have engaged further with the DHLGH in this regard. CE Recommendation: No change to draft plan.

	from adverse development impacts from development. Notes that draft SURF includes the following recorded monuments with statutory protection under the RMP: • DU017-121 — Lime kiln • DU018-033 — Church & graveyard • DU018-034 — Bridge • DU017-083 — Burial ground (nearby recorded monument outside but in proximity). Notes there are no known upstanding remains for the kiln (DU017-121) and bridge (DU018-034). Concludes that there are no predicted impacts on any listed monuments within or near the SURF area.	
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Seveso		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-23: Stephen Little and Associates SD-C418-38: Savills	Site Constraints and Development Context The Colas Bitumen Emulsions (East) Ltd, Bluebell Industrial Estate, Bluebell Avenue, Dublin 12 site is constrained by a number of environmental, safety, and operational factors which limit its redevelopment potential in the short-term. One of the constraints is its proximity to an Upper Tier Seveso establishment (BOC Gases Ireland). Along with other factors (including 50m proposed Natural heritage Area buffer required and functional reliance on HGV access), this restricts redevelopment and intensification opportunities and supports the continued appropriateness of industrial use in the short-to-medium term.	CE Response: Risk contour mapping was carried out by consultants engaged by SDCC and DCC for the Seveso sites within the City Edge boundary, in consultation with the HSA, and in the context of the HSA Guidance on Technical Land-Use Planning Advice (TLUP) (2023). The output of this mapping is reflected in terms of the uses and intensities proposed in the PDA layouts. It is noted that the Colas Bitumen site is outside of any PDA and is within the outer risk zone (as per the HSA's own TLUP risk contours for the BOC Gases site). Within this outer risk contour, there is significant flexibility regarding types and intensities of development. The HSA has prepared draft updated TLUP Guidelines and any impact on the proposed PDA layouts arising from the final version of the Guidelines, or any other necessary change, will be reflected in the SURF in the future. CE Recommendation:

		No change to draft plan.
	Policy Framework and Internal Inconsistency One submission from the operator of BOC Gases Ireland Limited relates to the Bluebell facility to the north of Naas Road which has been designated as an Upper Tier Establishment by the Control of Major Accident Hazards (COMAH) Regulations 2015. As a designated COMAH site (also known as a Seveso site), it is regulated under EU Directive, and the operators have previously engaged with DCC and SDCC on the City Edge Masterplan. This submission forms part of their continued engagement with the process, and the operators state that BOC Gases takes its safety obligations seriously and complies with all required legislation. The BOC Gases submission further references relevant objectives within the South Dublin County Development Plan (Policy CS2 Objectives 1 and 2) and the Draft City Edge SURF (Policy SEV1 Objectives 1-7). CDP Policy CS2 requires that regeneration frameworks be developed in collaboration with existing businesses, with due regard to operational requirements. In contrast, SEV1 Objectives 3 and 4 promote the relocation of Seveso sites.	CE Response: The Planning Authority welcomes the continued engagement of BOC Gases Ireland Limited with the City Edge plan process and notes the designation of the Bluebell facility as an Upper Tier Establishment under the Control of Major Accident Hazards (COMAH) Regulations 2015. There have been several individual engagements with BOC Gases along with general engagement in the context of public consultation (including participation in consultation sessions) for both the Strategic Framework (2022) and the current draft SURF. This engagement, along with the fact that PDA layouts have been designed taking risk contours around BOC Gases (and other Seveso sites) into account, would meet the requirements referred to under Policy CS2 for a co-ordinated approach to any future sustainable development of the City Edge area 'in collaboration with.....existing businesses, having regard to their operational needs.' CE Recommendation: No change to draft plan.

	Relocation objectives do not adequately consider the operational needs of existing facilities and are therefore not aligned with the collaborative and supportive approach required under CS2 Objective 2.	
	Relocation Feasibility The submission asserts that relocation of the Bluebell facility is not financially viable, due to the significant capital cost associated with acquiring suitable lands and the complexity of developing a compliant Seveso-designated facility. It is noted that relocation would likely result in the decommissioning of specialised infrastructure and the permanent loss of a purpose-built industrial asset.	CE Response: The issue regarding the cost of a Seveso facility relocating is noted. In the short to medium term, development within City Edge will be focussed within the PDAs. The urban design layouts for the PDAs have fully taken into account the risk contour mapping carried out (by the consultants and by the HSA where applicable) and use types and intensities permitted under the HSA's TLUP guidance are reflected therein. Therefore, while the overall policy approach is to encourage relocation and to ensure there is no increase in societal risk, the layouts for the draft SURF PDAs have assumed a regeneration scenario where Seveso sites within City Edge would remain in situ for the time being. CE Recommendation: No change to draft plan.

	Operational Characteristics and Land Use Compatibility The facility operates as a Seveso establishment, with inherent industrial characteristics including: • Noise, vibration, and light emissions • Variable operational intensity and output levels These characteristics are typical of established heavy industry and must be considered in land-use planning. The submission highlights the risk of incompatibility with sensitive uses, particularly residential development, if located in close proximity to such operations.	CE Response: The layouts for the PDAs have been designed taking into account the land uses and intensities allowed within the various risk contours around the BOC Gases site. The TLUP Guidance requires that sensitive uses such as residential, and schools are restricted in terms of where they can be located in relation to a Seveso facility, thus helping to mitigate any potential impacts on amenity. CE Recommendation: No change to draft plan.
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Utilities		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-5: Panda SD-C418-27: Greyhound Recycling SD-C418-35: Electricity Supply Board	Waste Management Concerns are raised over the delivery of waste management services if the SURF is implemented. A desire is expressed to protect current operations within and adjoining the City Edge from displacement, an increase in waste management infrastructure, recognition for waste management as essential strategic infrastructure and for future apartments/ high density residential developments to have capacity for three-bin collection systems Further concerns are raised regarding Ireland's limited waste and recycling infrastructure, for the growing population and a lack of alignment between national waste plans and dedicated land-use zoning at county level, and highlights the need to protect existing facilities Submissions further acknowledge that the South Dublin County Development Plan 2022-2028 supports the Circular Economy in accordance with the Waste Action Plan and the Waste Management Plan, and notes IE7 Objective 3 of Chapter 11.6 in	CE Response: The Planning Authority acknowledges the concerns raised. It should be noted that the City Edge SURF will comprise an appendix to the South Dublin County Development Plan (2022-2028) (CDP), and as referenced by the submission, Section 11.6 Waste Management on p.413 of the CDP, sets out a robust list of waste management policies and objectives, including to 'Implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes'. In addition to Policy IE7 Objective 3 referenced in the submission, Policy IE7 Objective 7 seeks 'To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste.' In this regard, any development facilitated by this variation will be required to demonstrate

	this regard. A submission requests that adequate provision is made for waste infrastructure on lands zoned REGEN within the City Edge boundary, with appropriate buffers and screening; that all new apartment developments provide space for three-bin segregated waste collection; and that waste management plans submitted with planning applications are adhered to, with emphasis on source segregation of reusable and recyclable materials on building sites.	compliance with the relevant policies and objectives in the CDP. Hence no change is required. CE Recommendation: No change to draft plan.
	Undergrounding Overhead Lines ESB supports the continued coordinated and plan-led consideration of opportunities such as undergrounding overhead lines within the City Edge area, in line with the SURF.	CE Response: The ESB's support for consideration of undergrounding overhead lines in a plan-led and co-ordinated manner is welcomed by the Planning Authority. CE Recommendation: No change to draft plan.
	Transmission and Distribution Infrastructure ESB strongly urges that its electrical transmission and distribution assets are appropriately safeguarded within the County Development Plan and associated SURF. This approach ensures that the City Edge regeneration can proceed without	CE Response: The Planning Authority acknowledges the ESB's points regarding safeguarding of electrical transmission and distribution assets, the importance of the Inchicore lands, safeguarding existing and future electricity corridors, substations

	jeopardising the electricity infrastructure that underpins its success. It is important that Proposed Variation No. 3 continues to recognise the presence and strategic role of electricity transmission and distribution infrastructure within the City Edge area and safeguards existing and future electricity corridors, substations and associated infrastructure. While the principal Inchicore electricity lands are located within the Dublin City Council administrative area, they perform a critical role in serving the City Edge lands within South Dublin through a network of overhead lines and underground cables. ESB welcomes the comprehensive and considered approach taken by South Dublin County Council in addressing high-voltage electricity infrastructure within the City Edge area. The proactive identification of suitable sites, along with the inclusion of provisions within the zoning matrix that allow for public utilities permissibility under all zoning objective is essential for the timely and cost-effective delivery of infrastructure.	and other infrastructure and identification of sites for substations. The ESB's support of the various objective in the draft SURF relating to engagement with utility providers, identification of sites for substations, meeting future electricity demand along with the provisions for public utilities within the Development Plan zoning matrix is also acknowledged. CE Recommendation: No change to draft plan.
	Medium and Low Voltage Network	CE Response:

	A review of the Medium and Low Voltage network throughout South Dublin County has resulted in identified areas where additional MV/LV substations and upgrades to existing substations are required. New MV/LV (10kV/400V) unit substations require a space of approximately 3 square metres and are typically sited in public locations, subject to agreement with landowners and/or local authorities. To guarantee the delivery of a secure, reliable, and efficient electricity network for customers in urban areas, it is essential that the South Dublin County Development Plan incorporates robust policy objectives supporting the reinforcement of the medium and low voltage (MV/LV) network to ensure that sufficient capacity is available to accommodate increasing demand. In this regard, ESB supports inclusion of ENG5 Objective 1, UTL1 Objective 1, and UTL1 Objective 3, in the final variation on the South Dublin County Development Plan.	The support of ESB for objectives in the draft SURF that would support the reinforcement of the medium and low voltage (MV/LV) network is acknowledged. CE Recommendation: No change to draft plan.
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Phasing and Implementation		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-2: Seamus Reilly SD-C418-14: Massey Bros Funerals SD-C418-17: Inland Fisheries Ireland SD-C418-20: Mashup Property Limited SD-C418-26: Office of Public Works SD-C418-30: C. Duffy Properties SD-C418-32: Department of Education and Youth	A number of submissions raise concerns regarding the deliverability and implementation of the SURF, with one stating that the framework is overly aspirational and may not progress as intended, citing examples such as Citywest and Adamstown. In contrast, other submissions support the phasing approach linking development to infrastructure delivery, noting that addressing these matters at plan-making stage provides greater certainty for landowners, developers and decision-makers and supports coordinated regeneration. One submission also highlights the importance of integrating community and supporting facilities within the overall planning framework, given the scale of projected development and population growth, and expresses a willingness for ongoing engagement throughout the process. Infrastructure provision is a key theme across several submissions. One submission recommends that planning permissions should not proceed until essential infrastructure such as potable water, drainage and stormwater systems are in place, emphasising that infrastructure delivery must	CE Response: The submissions in relation to implementation, infrastructure and viability are noted. The City Edge SURF recognises that the regeneration of the area is dependent on the delivery of infrastructure, stating that the successful regeneration of the City Edge area depends on delivery of several pieces of strategic infrastructure and embeds this through a phasing strategy whereby development does not progress beyond specified thresholds until infrastructure is delivered. This approach ensures that development is aligned with infrastructure provision in advance of and in tandem with population growth, addressing concerns regarding premature or uncoordinated development. The importance of water, drainage and flood management infrastructure is also recognised within the SURF, which requires coordinated delivery of utilities and promotes sustainable drainage systems integrated with development and the public realm. These matters are addressed by Policies SWRM1 and SWRM2 and their respective

<u>SD-C418-34: JSA Planning on behalf of Park Developments</u> <u>SD-C418-37: B&G Ltd</u>	precede zoning and development to protect water quality, fisheries and mitigate flood risk. Similarly, another submission states that mitigation measures and development limitations should be addressed at Draft Plan stage rather than Development Management stage, raising concerns that current policies on Surface Water and Rainwater Management are too generalised and recommending reference to the Camac Flood Relief Scheme as a key mitigation measure. A number of submissions focus on implementation, relocation and viability issues. One submission calls for the Planning Authority to actively plan for alternative locations to accommodate relocated industrial, warehousing and commercial uses, proposing additional 'EE – Enterprise and Employment' lands in the Metropolitan West area along the N7/M7 corridor. It also highlights barriers to regeneration, including high relocation costs, disruption to businesses, and viability challenges for residential development, suggesting that state investment and incentives will be required. Proposed measures include engagement with Government bodies to identify incentives to support relocation and referencing the Urban Regeneration and Development Fund as a mechanism to support infrastructure delivery.	objectives of the SURF which seek to prevent and mitigate flood risk and are supported by Policy IE3: Surface Water and Groundwater of the South Dublin County Development Plan 2022 – 2028. Submissions relating to phasing, certainty and the long-term implementation of the SURF are acknowledged. The framework is intended to provide a structured and coordinated approach to regeneration, with development focused within Priority Development Areas and supported by infrastructure delivery. In relation to relocation and viability, the SURF supports a balanced approach to regeneration, seeking to facilitate employment in mixed use contexts along with intensification and diversification into emerging sectors while protecting the existing employment function of City Edge while also enabling a transition from existing uses over time. The Strategy promotes engagement with relevant stakeholders and agencies to support delivery and recognises that implementation may require coordination, investment and appropriate mechanisms over the longer term. Overall, the SURF provides a framework for the coordinated delivery of development and infrastructure, ensuring that regeneration is
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	Finally, individual site-specific concerns are raised, including submissions stating that the Draft SURF could negatively impact the viability of potential development at Wilkins House and the Motokov site, and another noting that the duration of temporary uses should take account of the long-term implementation horizon of the SURF, particularly on REGEN-zoned lands.	deliverable, phased and supported by the necessary services and mitigation measures. CE Recommendation: No change to draft plan.
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Strategic Flood Risk Assessment		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-1: David Barton SD-C418-17: Inland Fisheries Ireland SD-C418-26: Office of Public Works SD-C418-32: Department of Education and Youth	One submission supports the policies and objectives of the draft SURF relating to surface water and rainwater management, as well as the proposed re-naturalisation measures. The submission recommends that a dedicated team be established to oversee and ensure compliance with these policies and further recommends that an independent audit at the planning stage of the surface water management and post management implementation proposal be submitted as part of a planning application.	CE Response: The Planning Authority welcomes the support for the policies and objectives of the draft SURF relating to surface water and rainwater management, as well as the proposed re-naturalisation measures. The Planning Authority notes the recommendation and states that Policy SWRM1 of the draft SURF already provides for the preparation of a Surface Water Management Plan and Rainwater Management Plan at the planning application stage. Furthermore, Section 12 Implementation and Monitoring of the South Dublin County Development Plan 2022–2028 provides for the monitoring and implementation of the necessary hydro plans through the development management process. Hence no change is recommended. CE Recommendation: No change to draft plan.

	Indicative School Location A number of submissions raise concerns regarding an indicative school location within Flood Zone B (currently used as a surface car park) in the Red Cow and Cherry Orchard PDA, with a recommendation that schools be located in areas with minimal or no flood risk.	CE Response: The Planning Authority acknowledges the submission and notes the concern raised regarding the indicative location of the school as shown in the draft SURF. School locations are shown indicatively within a block also containing a large area of community parkland. It is proposed to relocate the indicative school site to an area outside of a flood zone. The draft SURF will be amended accordingly to reflect this repositioning. CE Recommendation: Indicative school location to be repositioned. Refer to OPR response regarding the SFRA.
	NBS and SuDS Submission supports the use of SuDS techniques integrated with Green Infrastructure (GI) measures to manage surface water runoff and supports an area-wide approach rather than site-by-site solutions. Submission welcomes the details provided within the individual PDAs and Objective NIOS1. The submission further recommends that	CE Response: The Planning Authority welcomes the support for the use of SuDS techniques integrated with Green Infrastructure measures to manage surface water runoff, and further welcomes the support for an area-wide approach to surface water management. The Planning Authority also acknowledges the support for the details provided within the

	these measures also be clearly referenced within the SFRA.	individual Priority Development Areas and under Objective NIOS1. In relation to the recommendation that SuDS measures be more clearly referenced within the Strategic Flood Risk Assessment, it should be noted that Section 6.2 of the SFRA already references the following relevant policies: • NIOS1: Natural Infrastructure and Open Space • SWRM1: Surface Water/Rainwater Management • SWRM2: Flood Risk and Camac Renaturalisation • UTL1: Utilities The inclusion of SuDS measures is referenced frequently throughout the SFRA. Should the SFRA be updated, additional references to SuDS measures can be incorporated at that stage. Given the above no change is recommended. CE Recommendation: No change to draft plan.
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	CFRAM Programme The submission notes that the SFRA refers to the CFRAM study as a 2011 study, whereas the CFRAM Programme was completed in 2018.	CE Response: It is acknowledged that the CFRAM studies ran until 2018. The capture date for the OPW LiDAR of this area was 2011 and the cross-section survey on which the CFRAM was based was carried out in 2011 to mid-2012. It should be noted that the SFRA statement was to convey that CFRAM flood maps showing flood plains are based on LiDAR data captured during 2011 and as such any land use changes which have occurred since that date are not reflected in the flood maps. This can be clarified in any revision of the SFRA. Hence no change is recommended. CE Recommendation: No change to draft plan.
	PFRA Datasets Submission states that the PFRA pluvial flood maps used are not appropriate datasets for flood risk assessment, as they were only indicative maps provided to local authorities in 2012 and were developed using proprietary GIS techniques. Submission further recommends the use of more recent national indicative fluvial, coastal, and	CE Response: The Planning Authority acknowledges the submission and notes the concerns raised regarding the use of PFRA pluvial flood maps within the SFRA. The Planning Authority in consultation with the SFRA consultant wishes to clarify that the PFRA maps are not explicitly referenced in this SFRA. However, the SFRA completed as part of the SDCC County Development Plan 2022 to 2028 (CDP)

	groundwater flood maps, together with more robust community and local-scale mapping.	used the PFRA pluvial maps as the basis for the pluvial flood maps of the county, and since the SFRA for the draft SURF is produced as a variation to the CDP it was considered appropriate to include the CDP mapping. The Planning Authority further notes that the most recent available OPW community scale pluvial flood mapping sourced from the OPW run website Floodinfo.ie is also included. Hence no change is recommended. CE Recommendation: No change to draft plan.
	Consideration of Climate Change Impacts The submission welcomes the use of the CFRAM High-End Future Scenario (HEFS) as a precautionary approach to climate change and recommends that the wording set out in Section 2.24 of the Flood Risk Management Guidelines also be referenced.	CE Response: The Planning Authority welcomes the acknowledgement of CFRAM High-End Future Scenario (HEFS) as a precautionary approach to climate change. The Planning Authority in consultation with the SFRA consultant wishes to clarify that while the OPW considers flood zone A and B to be based on the current climate scenario, the HEFS has been used for the purpose of this variation, as the South Dublin County Development Plan 2022–2028 flood maps define Flood Zone A and Flood Zone B in terms of the HEFS scenario. This approach results in a more conservative

		definition of the flood zones. Hence no change is recommended. CE Recommendation: No change to draft plan.
	Hydromorphological Assessments The submission notes the details provided in Section 4 relating to riparian corridors and restoration measures. However, it recommends consideration of the potential increase in flood risk due to blockages caused by the introduction of woody debris within heavily urbanised watercourses.	CE Response: The Planning Authority acknowledges the submission and welcomes the support for the details provided in Section 4 relating to riparian corridors and restoration measures. The Planning Authority notes the recommendation regarding the potential increase in flood risk due to blockages caused by the introduction of woody debris within heavily urbanised watercourses, and wishes to clarify that, following consultation with the SFRA consultant, woody debris has been noted as a potential issue; however, any measures to be applied will ultimately be determined through the Camac Flood Alleviation Scheme (CFAS). The Planning Authority further note that should the SFRA be revised, it will be noted that the addition of woody debris can give rise to increased blockage risk and should be carefully considered. Hence, no change is recommended.

		CE Recommendation: No change to draft plan.
	Plan-Making Justification Tests The submission points out that three plan-making justification tests have been included covering the three priority Development areas identified in the SURF. It is pointed out that as per the Guidelines in areas where a flood risk is identified development should be avoided where possible and following the sequential approach only when development in an area of identified flood risk cannot be avoided and a zoning designation appropriate to the level of flood risk identified cannot be substituted should justification of inappropriate development be considered as an exception. As such it is not considered appropriate to apply a plan making justification test to a large area with multiple overlaps between varying proposed development types and varying level of identified risk. In this regard it is stated that Part 3 of the Plan Making Justification Test as out in the Guidelines is that 'A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the	CE Response: The points raised by the OPW are noted in regard to the justification test as set out in the Flood Risk Management Guidelines. In this regard section 3.7 of the Guidelines set out the following; <i>'It is recognised that the existing urban structure of the country contains many well-established cities and urban centres, which will continue to be at risk of flooding. At the same time such centres may also have been targeted for growth in the National Spatial Strategy, regional planning guidelines and the various city and county development plans taking account of historical patterns of development and their national and strategic value. In addition, development plans have identified various strategically located urban centres and particularly city and town centre areas whose continued growth and development is being encouraged in order to bring about compact and sustainable urban development and more balanced regional development'.</i> The Guidance further sets out that situations may arise where a Planning Authority will need to

	development plan process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. It is therefore requested that any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the Draft Plan as policy objectives and that such measures should not be passed to the Development Management Stage. The submission raises the following in regard to the Plan Making justification tests: 1. It is not generally appropriate to apply a Plan Making Justification Test to a large area with multiple overlaps between varying proposed development types and varying levels of identified flood risk. 2. Submission notes that Criterion 2(iii) of the justification test <i>requires that a zoning or designation is within or adjoining the core of an established or designated urban settlement.</i>	consider the future development of areas at high or moderate risk of flooding for uses or development vulnerable to flooding that generally would be inappropriate. In such cases the Planning Authority must be satisfied that it can clearly demonstrate on a solid evidence base that zoning or designation for development will satisfy the justification test criteria set out in Box 4.1 The City Edge area comprises of such lands being identified for regeneration and were zoned 'Regen' as part of the adoption of the South Dublin County Development Plan 2022-2028. As part of that process a Strategic Flood Risk Assessment was carried out as part of the plan making process. It is important to note that the SURF is an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 apply unless otherwise stated in the SURF (p.6). In line with the provisions of the justification test as set out in Box 4.1 of the guidelines it is worth noting that the City Edge lands are targeted for growth under the National Planning Framework and The Regional Spatial and Economic Strategy for the Eastern and Midland Region, the identification of the lands is required to facilitate large scale brownfield regeneration, the area comprises of
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	3. Submission notes that Criterion 2(v) requires <i>demonstration that there are no suitable alternative lands for the particular use or development type in areas at lower risk of flooding within or adjoining the urban core of the settlement.</i> 4. The Submission comments in detail on the Plan-Making Justification Tests under each criterion and states that these tests cannot appropriately be applied across a large area with multiple overlaps of varying development types and differing levels of flood risk.	underutilised lands, facilitates development within identified Core areas within City Edge, is essential in achieving compact urban growth. As set out under section 2.3.3 all land uses within the PDAs are consistent with the Development Plan land use zoning. The key element of land use within City Edge is that all categories are mixed use, with the use emphasis varying from category-to-category e.g. Res Led Mixed Use, Employment Led Mixed Use etc. The Planning Authority further notes that the land uses within the Priority Development Areas are identified for mixed-use not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels. As part of the development of each Priority Development Area, it is considered essential that these sites are developed in a cohesive and coordinated manner to ensure that the emerging urban centre becomes a vibrant and integrated whole, rather than remaining fragmented by existing industrial uses. While the Planning Authority is satisfied that the approach taken is consistent with Justification Test Criteria, in the interests of clarity it is proposed to amend the SFRA to provide more targeted Justification Tests where required (as shown below) and to ensure that
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		appropriate mitigation measures are provided for any areas which require them. The Planning Authority further notes that the ongoing Camac Flood Alleviation Scheme represents a key mitigation measure for the City Edge area and that its completion will provide an additional layer of flood protection for lands within the plan boundary. In light of this, it is considered that reference should be made to table 3.1 of <i>The Planning System and Flood Risk Management Guidelines for Planning Authorities</i>, published jointly by the Office of Public Works (OPW) and the Department of the Environment, Heritage and Local Government (DEHLG) in 2009. This measure would have the effect of amending Policy SWRM2 Objective 1. CE Recommendation: 1. Amend the SFRA to provide more targeted Justification Tests where required and to ensure that appropriate mitigation measures are provided for any areas which require them. This will involve an assessment at principal land use area level within each PDA. 2. Amend Policy SWRM2 Objective 1 as set out in the OPR's response and recommendation to the SFRA.
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SEA Report		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-10: EPA	The submission from the Environmental Protection Agency (EPA) advises that the draft SURF should align with key higher-level plans and programmes, including the National Planning Framework First Revision and the Eastern and Midland Regional Spatial and Economic Strategy (RSES), and should be consistent with their relevant objectives and policy commitments.	CE Response: The Planning Authority acknowledges the submission and confirms that the draft SURF has been prepared to align and be consistent with, the National Planning Framework First Revision and the Eastern and Midland Regional Spatial and Economic Strategy (RSES), as well as the South Dublin County Development Plan 2022–2028. The Revised NPF presents City Edge as a case study of large-scale brownfield regeneration and states that ‘City Edge is a unique opportunity to achieve Government policies of compact growth and transport-oriented development at scale, to reach national climate targets, and to make a significant contribution to resolving the housing crisis, while also generating substantial employment opportunities.’ The Eastern and Midland Regional Spatial and Economic Strategy (RSES) contains the Metropolitan Area Strategic Plan (MASP) for Dublin. City Edge is identified as part of the MASP’s Dublin South-West Strategic Development Corridor. The

		MASP highlights that City Edge comprises significant underutilised brownfield lands with potential for residential development and more intensive employment/mixed uses. CE Recommendation: No change to draft plan.
	Mitigation Measures EPA submission advises that appropriate mitigation measures should be included to avoid or minimise potential significant environmental effects and ensure to include clear commitments to implement the mitigation measures.	CE Response: The Planning Authority notes the recommendation on mitigation measures in the submission. In consultation with the environmental consultant the Planning Authority confirms given the close integration and consideration of environmental issues throughout the draft SURF and considering its preparation over a number of years, and the relatively low overall environmental sensitivity, no additional mitigation measures, beyond those in the existing South Dublin County Development Plan 2022–2028 are recommended through the SEA or AA processes. Hence no change is required. CE Recommendation: No change to draft report.

	Monitoring: The submission provides recommendations regarding the Monitoring Programme, stating that the programme should be flexible and take account of specific and unforeseen adverse impacts and environmental issues, include consideration of both positive and negative effects, and clearly set out data sources, monitoring frequencies and responsibilities. The submission further recommends reviewing the outputs from previous monitoring programmes of prior iterations of the plan to help improve future monitoring arrangements for the new plan period. Future environmental monitoring and reporting associated with the implementation of the revised County Development Plan should, where relevant and appropriate, have regard to and reflect the monitoring measures set out in Table 7.1 of the SEA Statement -Monitoring Programme for the First Revision of the NPF (2024-2030).	CE Response: The Planning Authority notes the recommendations on the Monitoring programme. The Planning Authority in consultation with the environmental consultant confirms that a review of the NPF SEA Statement - Monitoring Programme has been undertaken. It should be noted that the City Edge SURF will comprise an appendix to the South Dublin County Development Plan 2022-2028 (CDP); the existing monitoring regime of the CDP is therefore considered the most appropriate at this juncture and hence no change is required. CE Recommendation: No change to draft plan.
	Future Amendments to the Variation The submission further advises that any future amendments to the Variation should be screened for SEA and Appropriate Assessment (AA) and sets out relevant guidance and guidelines in this regard.	CE Response: The Planning Authority, in consultation with the Environmental Consultant, acknowledges the guidelines and guidance documents referenced in the submission and confirms that any future amendments to the draft City Edge SURF

		(proposed Variation) will be subject to SEA and AA Screening, and the guidelines and guidance documents will be applied as appropriate. Hence no change is required. CE Recommendation: No change to draft plan.
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Red Cow and Cherry Orchard Priority Development Area		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-32: Department of Education and Youth SD-C418-38: Savills	Priority Development Areas: The submission notes the close proximity of the Red Cow and Cherry Orchard PDA, and the Long Mile PDA from the Seveso site. The submission argues that the introduction of residential developments in such close proximity to their facility would be at direct odds with the current use of the facility and would impact on the amenity of potential future residents. Any future development proposals within the PDAs should direct future residential development away from the Bluebell facility and to the most appropriate area that would not conflict with BOC Gases' existing operations.	CE Response: The Planning Authority notes the concerns raised regarding the proximity of the Bluebell facility to the Long Mile PDA and the Red Cow and Cherry Orchard PDA. SDCC and DCC engaged consultants to carry out risk analysis of the Seveso sites within City Edge, including BOC Gases. The Health and Safety Authority was consulted during this study, and the analysis was guided by the HSA's Guidance on Technical Land-Use Planning Advice (2023). The results of the analysis informed the proposed land-use types, capacities and intensities of development within the Long Mile and Red Cow & Cherry Orchard PDAs. As such, the PDA layouts were designed taking the full context of BOC Gases and other Seveso sites into account. Individual planning applications will continue to be referred to the HSA. Since the study was prepared, the HSA has issued updated draft Guidance on Technical Land Use

		Planning Advice (2026). If the finalised Guidance results in any requirement for amendments to the layouts, use-types or intensities of development within the relevant PDAs, such revisions will be implemented by SDCC. CE Recommendation: No change to draft plan.
	Site Specific Notes that population target will result in requirement for one primary and one post primary school and notes that 2 schools have been indicated on the relevant map. Concerns are raised regarding an indicative school location within Flood Zone B in the Red Cow and Cherry Orchard PDA, with a recommendation that schools be located in areas with minimal or no flood risk.	CE Response: Policy SCCA1 Objective 1 commits to 'to continue to engage with the Department of Education and Youth regarding schools need, while actively monitoring planning applications, construction activity and population growth in the area, and taking into account latent capacity in existing schools in the wider area'. Therefore, the Department will be involved in decisions regarding schools need in City Edge, as elsewhere within the County. An indicative school site identified in the City Edge SURF can be either a primary or post-primary school. School sites are in indicative locations. As such, the proposed school site currently within Flood Zone B

		can be relocated to a nearby area outside the Flood Zone. CE Recommendation: Refer to the response to the submission received from the Office of the Planning Regulator regarding the relocation of the indicative school site.
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Long Mile Priority Development Area		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-30: C. Duffy Properties SD-C418-32: Department of Education and Youth SD-C418-38: Savills	School Provision: The submission from the Department of Education and Youth (D EY) notes the estimated population target for the Long Mile PDA and confirms that, in accordance with this target, a requirement for one primary school has been identified, as reflected on the relevant map within the draft SURF. With regard to post-primary provision, the Department notes that the anticipated population growth can potentially be accommodated within post-primary schools located in the other two PDAs, provided that such schools are accessible to students residing in the Long Mile PDA.	CE Response: The Planning Authority notes the submission from the Department of Education and Youth regarding school provision within the Long Mile PDA and in particular the confirmation that the envisaged population that would be generated within the area would require one primary school. The Draft SURF shows an indicative location for one school within the PDA, thus satisfying the Department's requirements in this regard. The Planning Authority further notes the Department's advice that the anticipated post-primary school demand generated by the Long Mile PDA can potentially be accommodated within post-primary schools located within the other two PDAs, subject to those schools being accessible to students residing in the Long Mile PDA. The Planning Authority will continue to liaise with the Department of Education and Youth in relation to the timely delivery of school provision in tandem

		with population growth in the PDA, in accordance with the objectives of the draft SURF. CE Recommendation: No change to draft plan.
	Location of Seveso site in proximity to the PDA: The submission notes the proximity of the Red Cow and Cherry Orchard PDA and the Long Mile PDA to the BOC Gases Bluebell facility and contends that the introduction of residential development in close proximity to a designated Seveso site would conflict with the existing operations of the facility and adversely impact the amenity of future residents. The submission requests that future residential development within the PDAs be directed away from the Bluebell facility to locations that would not conflict with BOC Gases' ongoing operations.	CE Response: The Planning Authority notes the concerns raised regarding the proximity of the Bluebell facility to the Long Mile PDA and the Red Cow and Cherry Orchard PDA. SDCC and DCC engaged consultants to carry out risk analysis of the Seveso sites within City Edge, including BOC Gases. The Health and Safety Authority was consulted during this study and the analysis was guided by the HSA's Guidance on Technical Land-Use Planning Advice (2023). The results of the analysis informed the proposed land-use types, capacities and intensities of development within the Long Mile and Red Cow & Cherry Orchard PDAs. As such, the PDA layouts were designed taking the full context of BOC Gases and other Seveso sites into account. Individual planning applications will continue to be referred to the HSA. Since the study was prepared, the HSA has issued updated draft Guidance on Technical Land Use Planning Advice (2026). If the finalised Guidance

		results in any requirement for amendments to the layouts, use-types or intensities of development within the relevant PDAs, such revisions will be implemented by SDCC. CE Recommendation: No change to draft plan.
	Site Specific Submission One submission relates to a c. 1.8-hectare site at the Motokov Complex, Long Mile Road/Naas Road, Dublin 12, within the proposed Long Mile Priority Development Area, where an LRD proposal for a residential-led mixed-use scheme of approximately 479 no. units, 2,305 sqm of commercial/retail floorspace, and a 618.5 sqm crèche is currently at Stage 2 (Section 32b) pre-planning consultation. Submission notes that pre-application discussions with the local authority have been ongoing since 2023, during which the applicant was advised to await the statutory variation before progressing a planning application, and that the design process was subsequently recommenced following advice in January 2025 that the variation was on hold pending legislative changes. The scheme has been informed by detailed hydromorphological and flood risk assessments in response to the River Camac,	CE Response: The Planning Authority notes the concerns raised in relation to the site at the Motokov Complex and acknowledges the pre-application engagement that has been ongoing with the applicant. The Planning Authority further notes that an LRD pre-planning process for a residential-led mixed-use scheme of approximately 479 units is currently at Stage 2 consultation. It is noted that the Long Mile PDA, within which the Motokov site is located, was within the Naas Road District in the City Edge Strategic Framework (2022), the previous non-statutory plan which set out a high-level vision and delivery strategy for the area. Within this document the site was located within an area identified for Mixed-Use Employment and Residential (MUER), which required a greater employment content than residential-led mixed-use areas. MUER was refined to become

	and the submitter considers it to represent a high-quality, policy-compliant response to the site. While supporting the overall regeneration vision of the area and the principle of a strategic planning approach, the submission raises concerns that the prescribed numerical standards in the draft SURF, particularly in relation to building height, residential unit caps, employment floorspace quantum, and plot ratio stating that this would render the progressed scheme non-compliant and undermine its viability. It is contended that the draft SURF-compliant scheme would yield only 172–198 residential units alongside a minimum of 18,613 sqm of employment floorspace, which is considered financially unviable given current market conditions and the early-stage nature of regeneration in the area. The submission argues that this conflicts with national and regional policy objectives for high-density compact urban growth on accessible brownfield lands, with particular reference to the Sustainable Residential Development and Compact Settlements Guidelines 2024 and the Urban Development and Building Heights Guidelines for Planning Authorities (2018). The submission further flags that the volume of numerical targets within the draft SURF risks internal conflict and increased litigation within the planning process, and requests that the building	Employment-Led Mixed Use in the draft SURF, indicating the emphasis on employment within this area going to back to 2022. The numerical targets within the draft SURF were devised following a masterplanning process that involved an urban design and capacity assessment. The standards set out in the draft SURF are intended to provide guidance for the assessment of planning applications, and the draft SURF also sets out circumstances where flexibility in relation to some development parameters is available, subject to certain requirements being satisfied. In relation to the litigation risk flagged in the submission, it is noted that the draft SURF is proceeding in accordance with the statutory requirements of Section 58 of the Planning and Development Act 2024 as a variation to the South Dublin County Development Plan 2022–2028. CE Recommendation: No change to draft plan.
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	height limits and employment floorspace requirements for Neighbourhood 2 be revised, that fixed housing targets and unit caps be removed, and that a site-specific, design-led approach to density be adopted in order to enable the delivery of a high-quality, viable residential-led development.	
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Greenhills Priority Development Area		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-32: Department of Education and Youth SD-C418-37: B&G Ltd	The Department of Education and Youth notes the table for Greenhills setting out the estimated future population. It states that this will generate a requirement of two primary schools and one post primary school and notes that indicative locations for three schools have been shown on the relevant map.	CE Response: The Planning Authority notes that the proposal for three schools within Greenhills PDA aligns with the Department's requirements for the area based on the envisaged population. Further engagement will take place in the context of future development proposals generating need for schools to be provided. CE Recommendation: No change to draft plan.
	Site Specific Submission The Wilkins House site lies within the Greenhills PDA. A section 247 pre-application consultation meeting was held with SDCC on Feb 16th, 2026, in regard to this site. While supporting the overarching objectives of the Draft SURF, the submission raises concerns that certain aspects of the Proposed Variation, when taken cumulatively, risk	CE Response: The Wilkins Site is located within Neighbourhood 5, at the eastern end of the proposed Greenhills PDA. It is in close proximity to the existing Walkinstown local centre, presenting an opportunity to build upon this established activity and extend local centre uses westward.

	undermining the delivery and viability of a mixed-use scheme at the subject site. It is expressed in this submission that the land use mix, buildings heights, plot ratio and car parking standards within the PDA are not compatible with the viability of the Wilkins House development and differ from the City Edge Strategic Framework (2022) to an extent as to have negative ramifications for viability. Submission also notes that Shop- Neighbourhood is 'permitted in principle' land use in the Development Plan within Local Centre zones but is 'Open for Consideration' in the Draft SURF within REGEN zones, creating a potential issue for identified local centres within the SURF area that are zoned REGEN. The following footnote is suggested to prevent inconsistency: “**Where lands zoned REGEN are designated within the 'Local Centre' land-use mix category, 'Shop – Neighbourhood' uses (1,000–2,500 sq. m net retail floorspace) shall be considered Permitted in Principle, pending any future rezoning of such lands to Local Centre through a subsequent Development Plan review.” The submission further goes to note that the plot ratio in the City Edge Strategic Framework (CESF)	The draft SURF is a refinement of the City Edge Strategic Framework (2022) following a masterplanning process involving more detailed analysis of land use and capacity, and specifically focusing on the more focussed PDA areas as opposed to the entire City Edge area. Therefore, as a result of this refinement process, development parameters may diverge from those set out in the Strategic Framework (2022), in some instances. Land use mix, building height, plot ratio and car parking standards have been devised following the masterplanning process which was guided by the ambition for mixed use neighbourhoods with good urban form, resulting in lively and attractive places. 'Land uses that are listed as 'open for consideration' in the land use zoning tables may be acceptable to the Planning Authority subject to detailed assessment against the principles of proper planning and sustainable development, and the relevant policies, objectives and standards set out in this Plan'. This therefore allows consideration of Shop-Neighbourhood within REGEN zones. Hence no change is recommended. It is noted that the City Edge Strategic Framework (CESF) (2022) is a non-statutory document and that the Draft SURF is being brought forward as a
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	2022 is 1.5-2.2, whereas in the draft SURF it is 1.5(+/- 15%). It is suggested that the Indicative Community and Cultural Facility Location should be moved to a more accessible location within the PDA and that the Indicative Community Park Location should be repositioned to reduce impact on development potential of the Wilkins House Site. A plot ratio of 1.5 (+/- 15%) is regarded as a crude location-based measure of development intensity and hinders responsiveness and performance-based assessment. It is asserted that this may jeopardise the delivery of compact growth and regeneration of the area.	proposed Variation to the South Dublin County Development Plan (2022–2028) which will confer statutory status. The more detailed proposals in the draft SURF follow a refinement of the higher-level strategy in the City Edge Strategic Framework (2022). It is noted that locations for schools and community/cultural facilities are indicative, which introduces flexibility, allowing consideration on a case-by-case basis. The location referred to is within the proposed Walkinstown Local Centre extension and is therefore considered an appropriate setting for one or more such uses. The draft SURF provides scope for alternative locations for such uses to be considered ‘based on proximity to regeneration, access to public transport and catchment’ (Section 2.9.2, p. 72). SCCA2 Objective 3 also provides scope for a contribution in lieu, in line with the Development Contribution Scheme at the discretion of the Council. Likewise, locations for community parks are indicative and there is provision for a contribution in lieu where a development cannot provide adequate lands towards a community park. In the context of the above policy framework, it is considered that there is adequate flexibility in the requirements for community facilities and community parks.
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		The approach to car parking allows for higher levels of parking (including on-site) to be provided in the short-term, with levels reducing as public transport improvements comes on stream, and as shared parking buildings are developed. In relation to building height, the draft SURF provides for heights of generally 6-16 storeys, with lower heights close to sensitive locations. Policy IOD1 Objective 3 allows for additional building height flexibility in certain locations including close to public transport stops and key public spaces. Plot ratios have been devised with regard to each overall PDA and with the aim of optimising built form. The provision for plot ratios to deviate by up to plus or minus 15% adds flexibility. The up to 15% uplift in plot ratio will be facilitated in particular circumstances including where there is: • Amalgamation of landholdings to create one large site with a proposal to include phased delivery of key physical and social infrastructure • Provision of a shared parking building • Provision of anchor use such as major arts, cultural, educational or civic infrastructure as part of mixed-use development.
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		Bonus plot ratio increases and/or flexibility around mix of use targets can also be considered where a significant part of a major park, community park, greenway or green corridor is delivered and where an exemplar development is provided in relation to placemaking and amenity, etc. There is also flexibility around the proportion of employment uses required in a given development having regard to issues such as the location and size of the site; amount and type of floorspace being demolished; quality and economic value of proposed uses; street frontage quality; amount of non-residential floorspace already built within the PDA; provision of space for relocating businesses; off-site non-residential floorspace delivered by the applicant, etc. It is contended that the measures above, when considered together, offer significant flexibility with regard to land use mix, buildings heights, plot ratio, car parking and provision of parks and community facilities and enhance the prospect of sustainable and compact mixed-use development being delivered in the City Edge area. CE Recommendation: No change to draft plan.
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Development Outside of a PDA		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C418-20: Mashup Property Limited SD-C418-29: Guestford Limited SD-C418-34: JSA Planning on behalf of Park Developments	A number of submissions relate to development outside of a Priority Development Area (PDA) including amendments to the policy regarding development outside a PDA. One submission seeks the inclusion of the Red Cow Moran Hotel lands, of approximately 5–7 hectares, located within the City Edge regeneration framework area, and in close proximity to an identified PDA, within the first phase of the City Edge project. The submission argues that the lands share many of the same strategic characteristics as the designated PDAs, including a gateway location with strong transport connectivity, proximity to the Luas, multiple bus routes, and major employment areas. The submission further states that the site, which is currently underutilised, has the capacity to deliver substantial residential and commercial development, public open space, and green infrastructure within the short to medium term, and that its inclusion would support the wider strategic planning, regeneration, connectivity, and placemaking objectives of the City Edge.	CE Response: The Planning Authority notes the request for inclusion of the Red Cow Moran Hotel and the strategic characteristics and development potential of the subject lands as outlined in the submission. The identification of the three PDAs within the draft SURF was informed by a masterplanning process, having regard to factors, including existing and proposed transport connectivity, development context, proximity to amenities such as open space, and constraints, including flooding, overhead lines and Seveso sites. The areas identified as PDAs were chosen following this process, as these locations are most capable of delivering transformational change in the short to medium-term, and have the best placemaking potential, thereby making the best use of public and private investment. CE Recommendation: No change to draft plan.

	A further submission made on behalf of lands at Apex Hub, Calmount Road, zoned for Enterprise and Employment and located outside the PDAs identified in the draft SURF, seeks further acknowledgment in Section 2.4.4 'Development outside of PDAs' that if further applications are required for amendments to permitted development, that such applications will be considered on their merits. Additional text proposed to include in the SURF: <i>'Development on Enterprise and Employment zoned lands outside the PDAs will be considered on its merits and against the requirements of the CDP, whilst having regard to the provisions of the SURF.'</i> The submission considers Policy PDA4 'New Development outside a PDA' too restrictive and proposes the following wording (proposed additional wording in bold underlined): <i>"New development outside the PDAs will generally only be permitted where it is demonstrated that it would <u>comply with the land use zoning objectives</u>, not result in piecemeal development, that adequate amenity will be provided, and that it would be compliant with the City Edge Strategic Urban Regeneration Framework (SURF) and relevant development policies"</i>	CE Response: It is considered that the existing policy framework for development outside a PDA, including the text in Section 2.4.4 and Policies PDA4 and PDA5, provide adequate clarity in relation to the treatment of such development proposals. It is considered that the proposed wording <i>'Development on Enterprise and Employment zoned lands outside the PDAs will be considered on its merits and against the requirements of the CDP, whilst having regard to the provisions of the SURF.'</i> is unnecessary as it would be stating something that is implicit. Amendments to permitted development would be considered on their own merits and having regard to CDP and SURF policy, in any event. Likewise, it is considered that the proposed addition of the wording 'comply with the land use zoning objectives' is unnecessary as this is already implicit in the reference within the objective to compliance with Development Plan policies. CE Recommendation: No change to draft plan.
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Section 5: Proposed Amendments to Maps

The following proposed amendments to maps arise from responses to submissions and from the Chief Executive's review of the document. The proposed amendments are organised in the order in which they appear in the summary tables in Section 2. Some proposed map changes may be identified for one map, but may apply to several maps. In such cases, the analogous changes will also be made in the other maps.

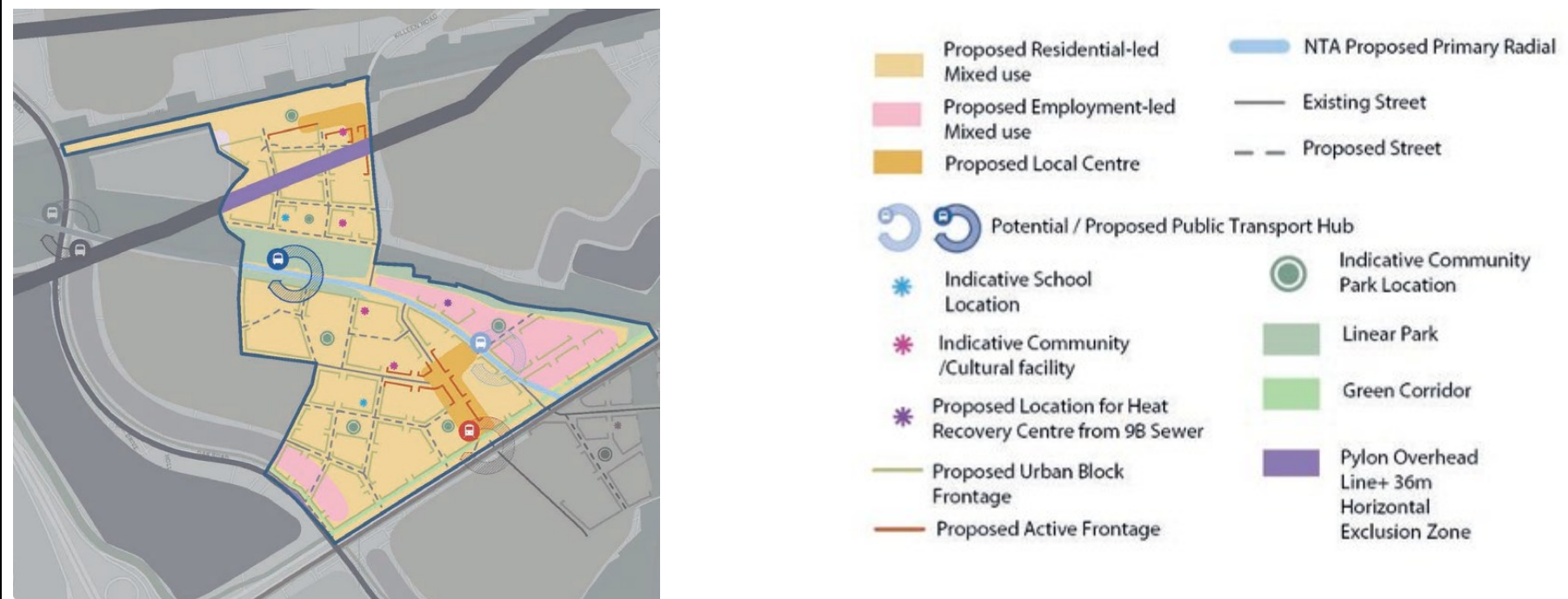
Figure 25: Layout and Structure Diagram of the Red Cow & Cherry Orchard PDA (p. 141)

Proposed Amendments:

1. Relocate the location of the indicative school.
2. Include a mobility hub at the intersection of Naas Road and Oak Road.

3. Amend the legend accordingly.

Existing Figure



Proposed Amended Figure

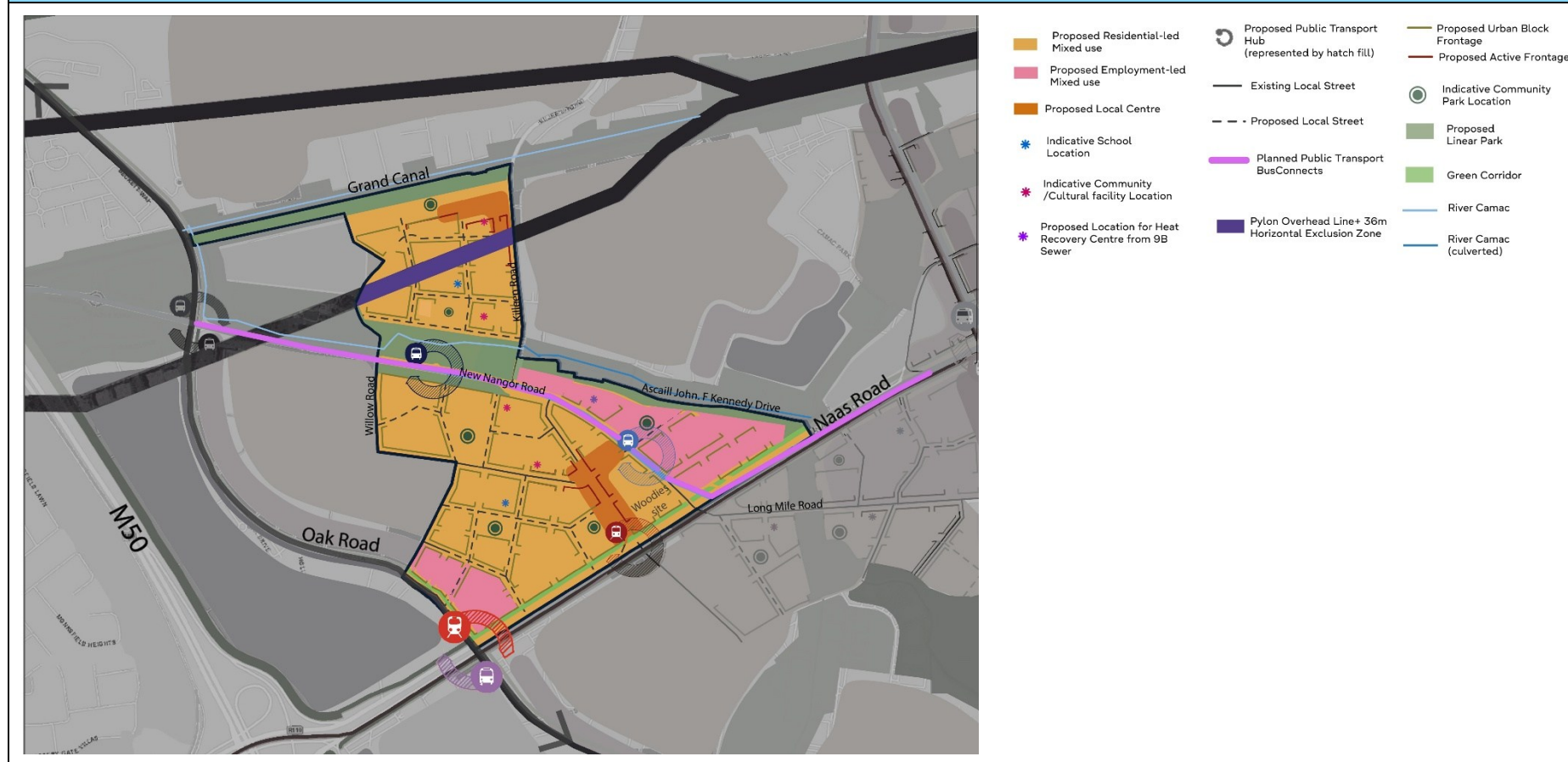
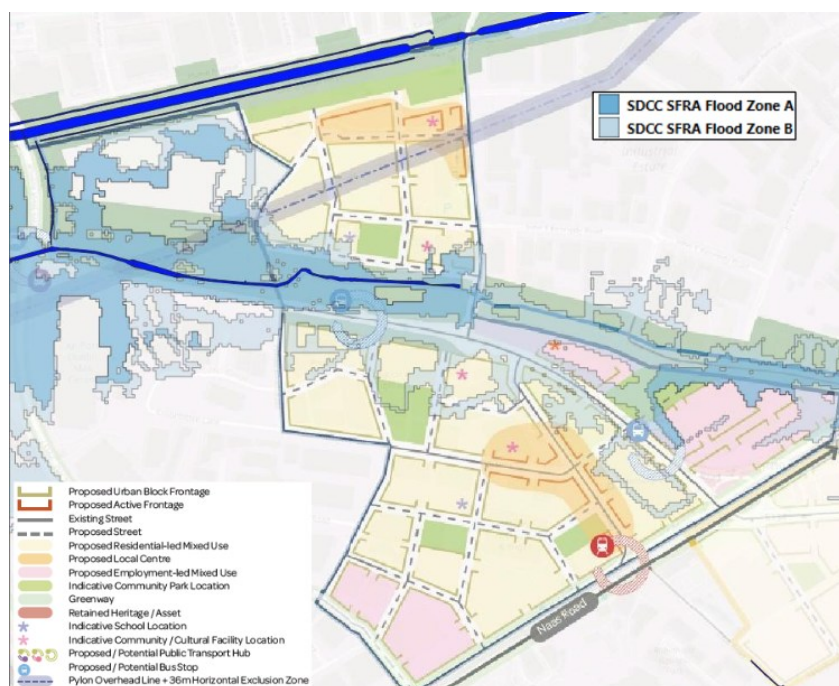


Figure 5-2: Red Cow & Cherry Orchard Flood Zone A & B Map (p.30 of the SFRA)

Proposed Amendments:

1. Relocate the location of the indicative school.
2. Include a mobility hub at the intersection of Naas Road and Oak Road.
3. Improve the clarity of street names and colours.
4. Indicate a mobility hub at the intersection of Naas Road and Oak Road.
5. Amend the legend accordingly.

Existing Figure



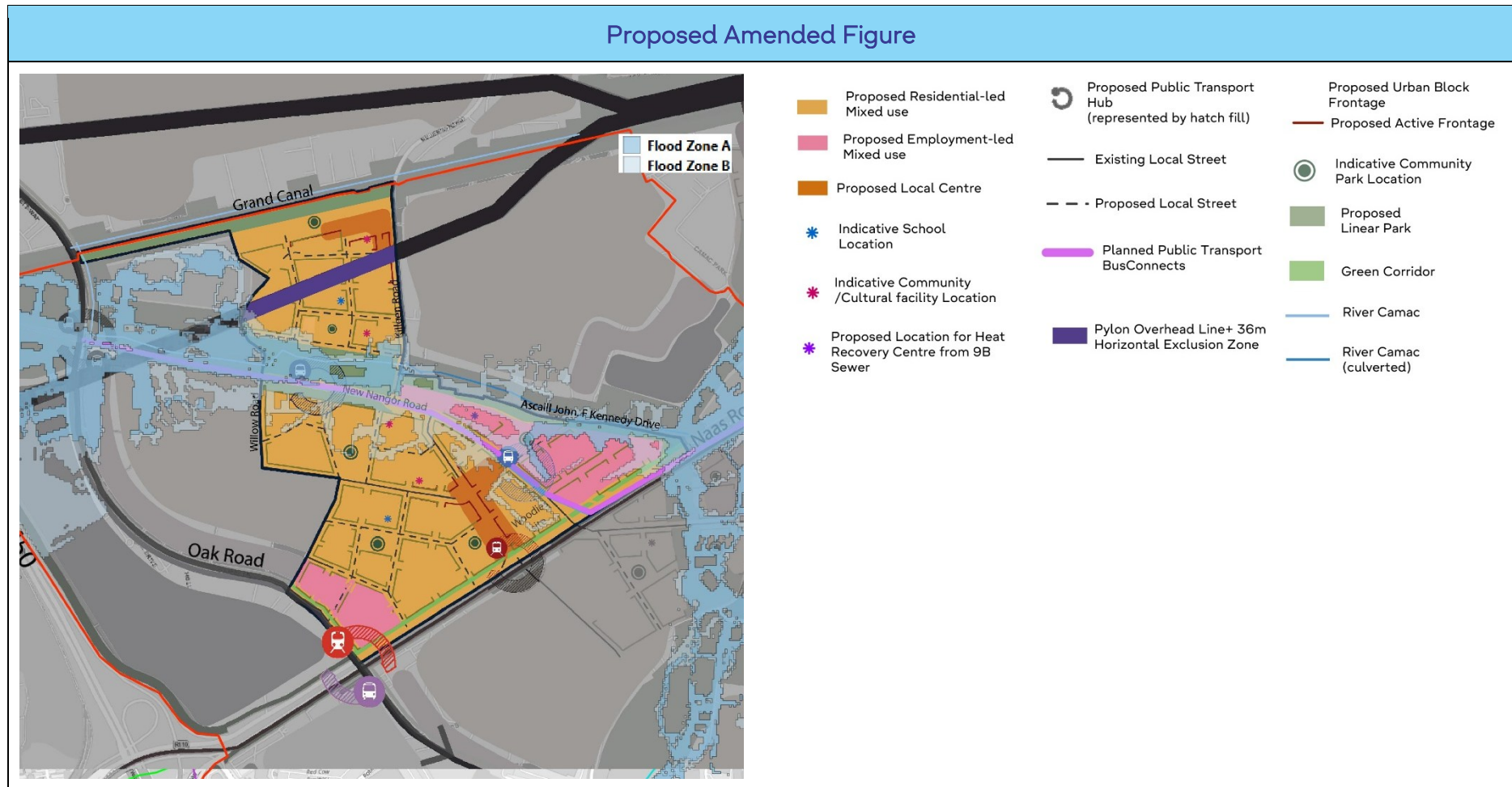
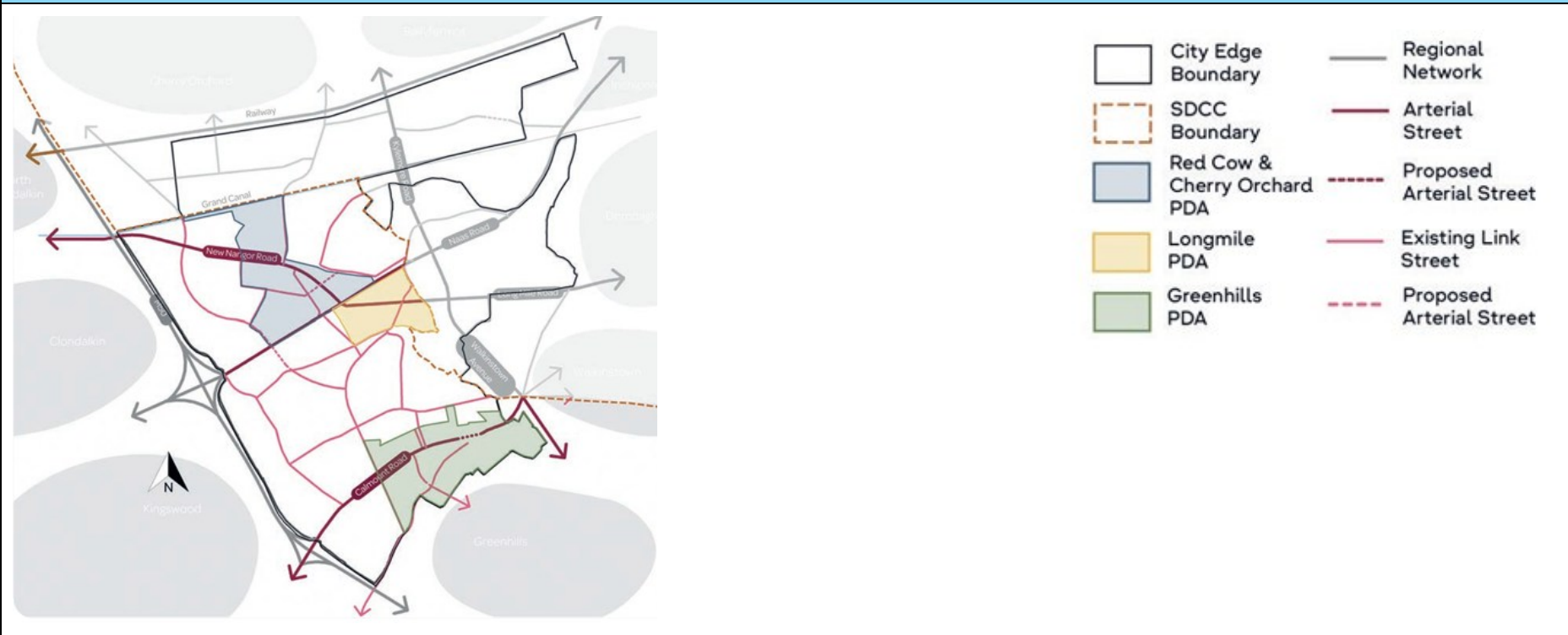


Figure 5: City Edge Street Hierarchy (p.42)

Proposed Amendments:

1. Improve the clarity of street names and colours.
2. Indicate Oak Road as a Proposed Arterial Street.
3. Indicate the railway and Grand Canal.
4. Amend the legend accordingly.

Existing Figure



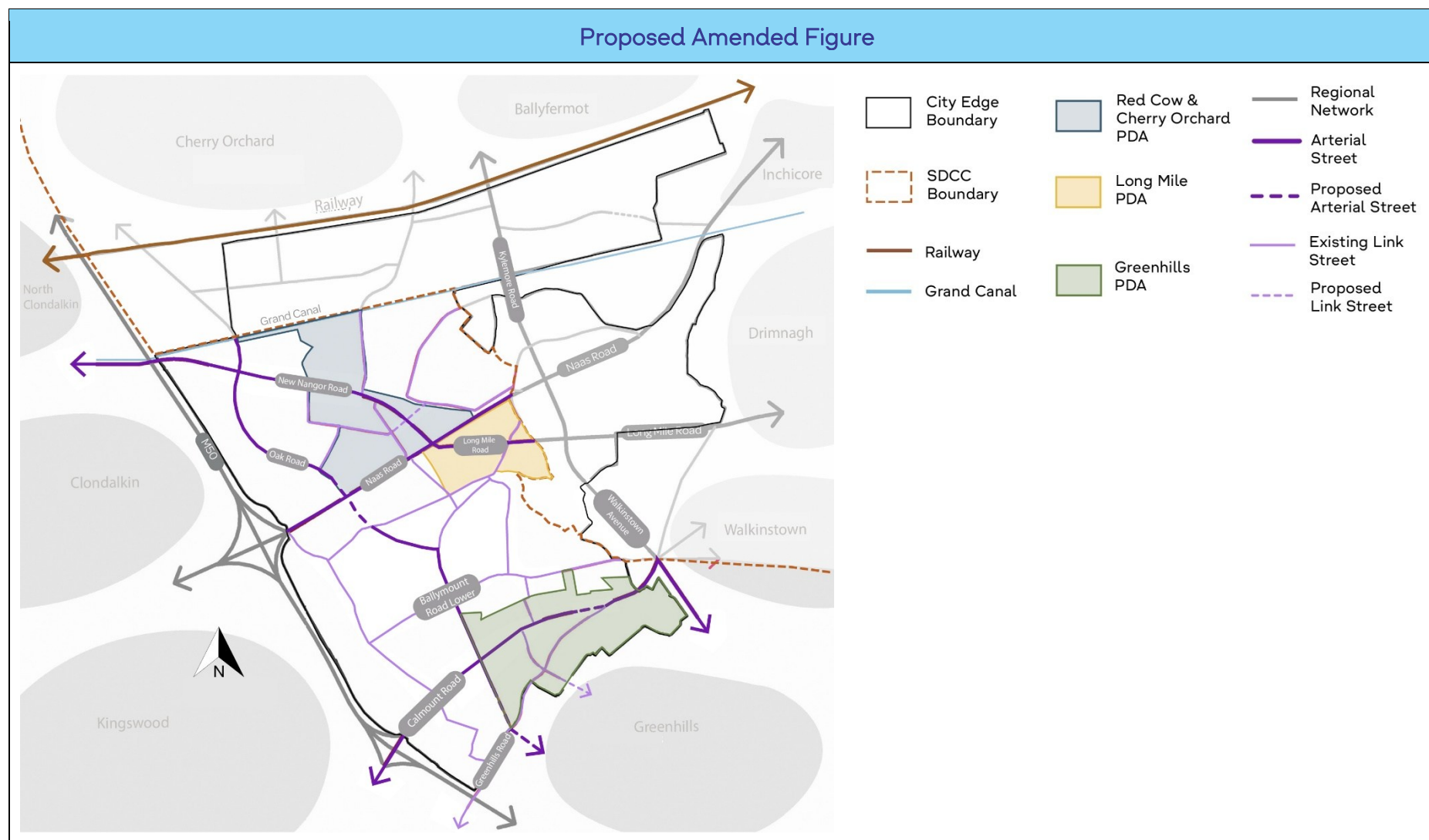


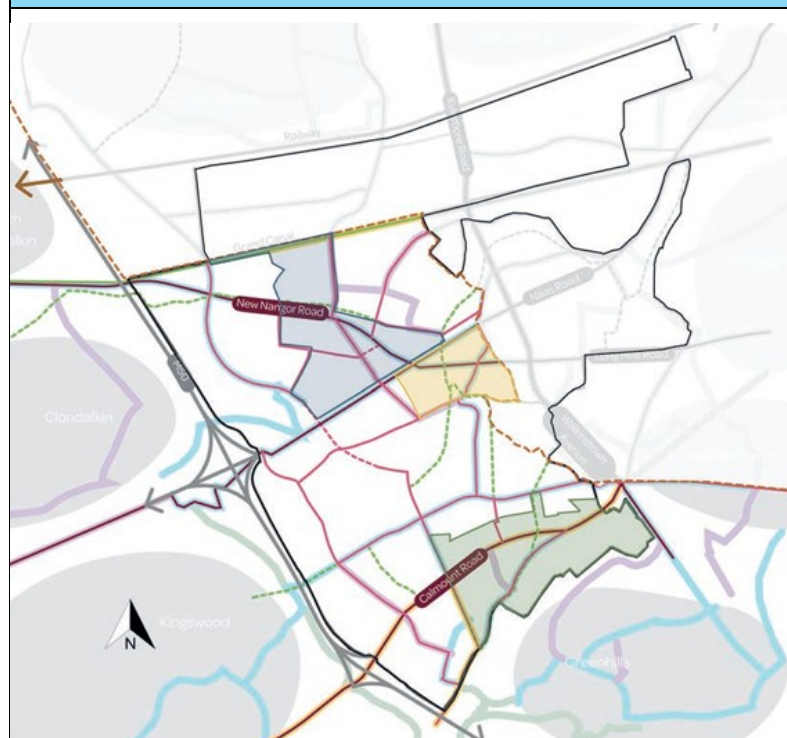
Figure 6: Cycle Route Mapping (p.44)

Proposed Amendments:

1. Improve the clarity of street names and colours.
2. Indicate Oak Road as a Proposed Arterial Road.

3. Amend the legend accordingly.

Existing Figure



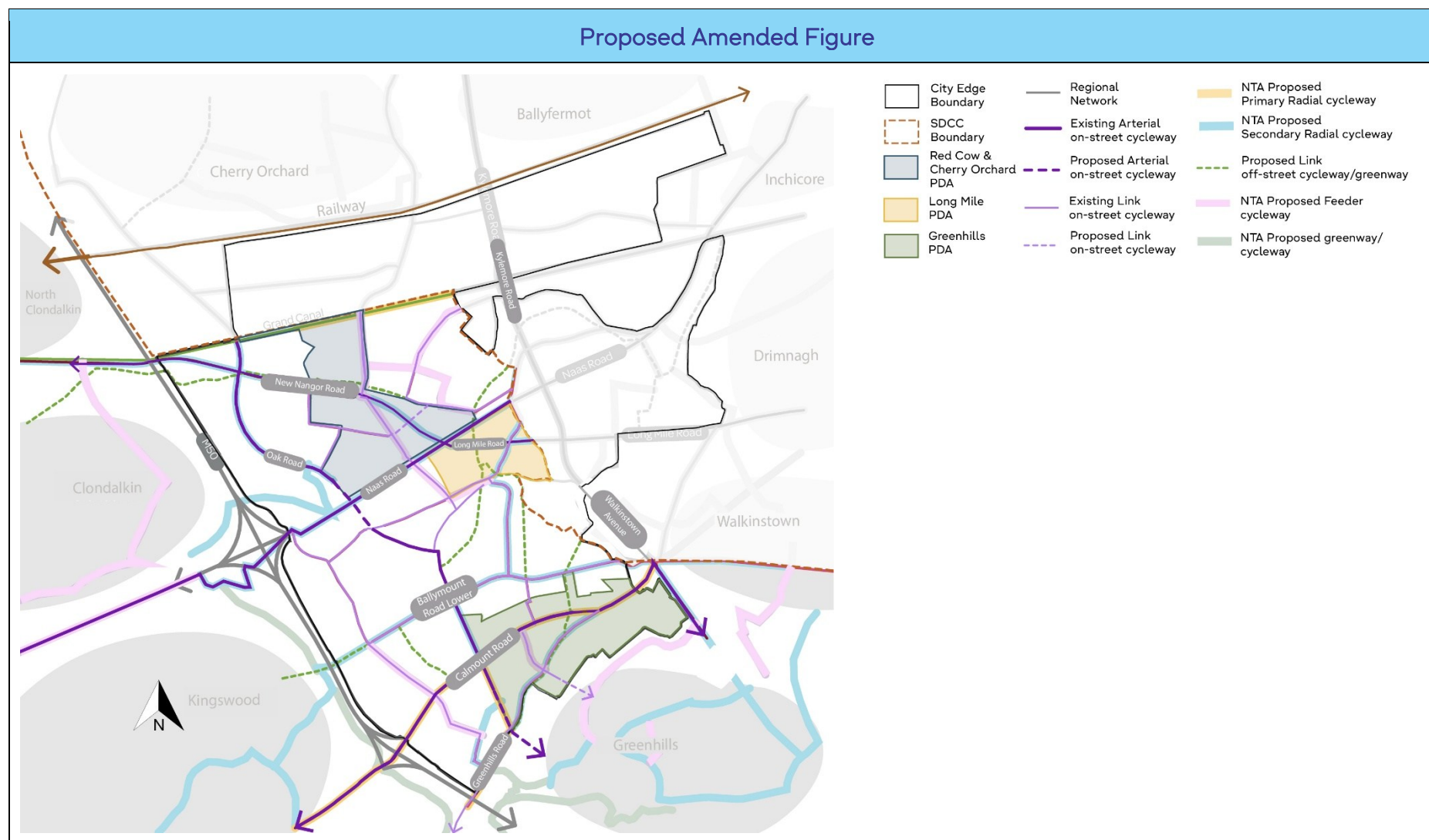
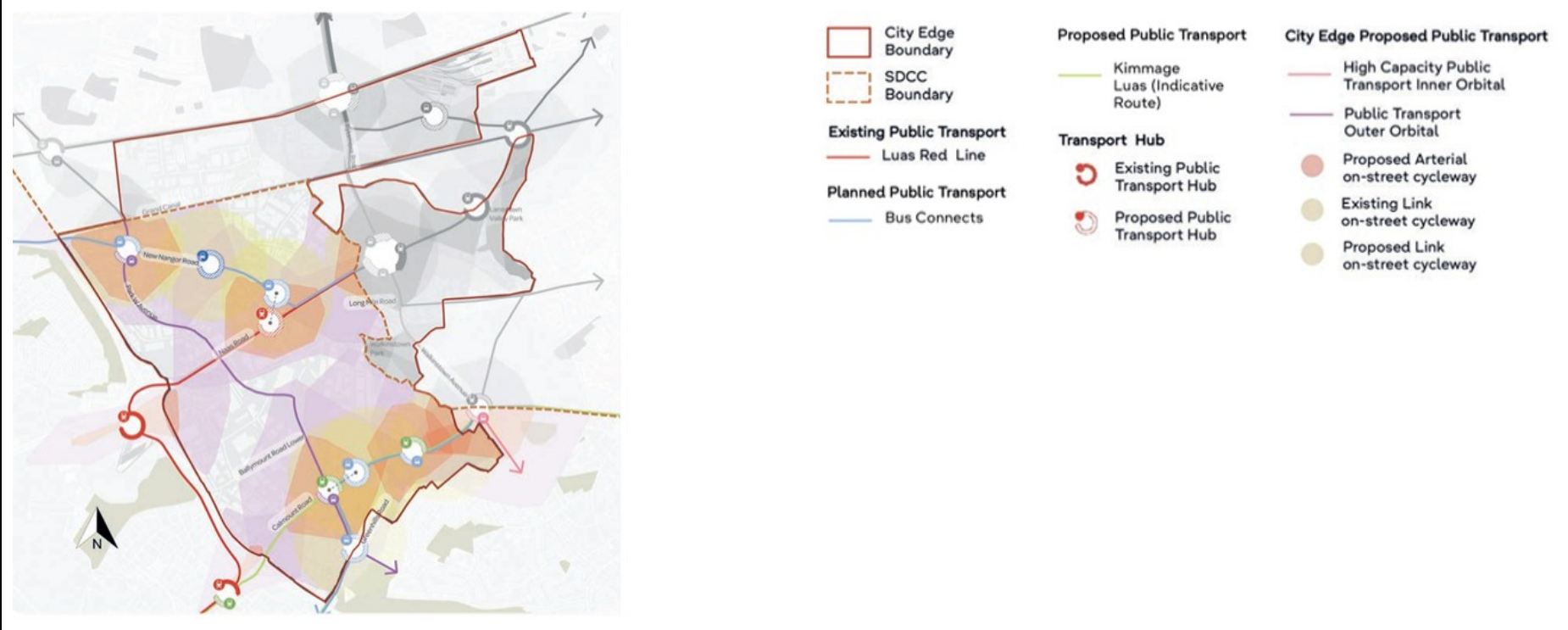


Figure 7: Existing planned and proposed public transport in City Edge (p.45)

Proposed Amendments:

1. Indicate a Mobility Hub at the intersection of Naas Road and Oak Road.
2. Indicate the proposed DART+ South West.
3. Indicate the railway and Grand Canal.
4. Walking distances specified.
5. Amend the legend accordingly.

Existing Figure



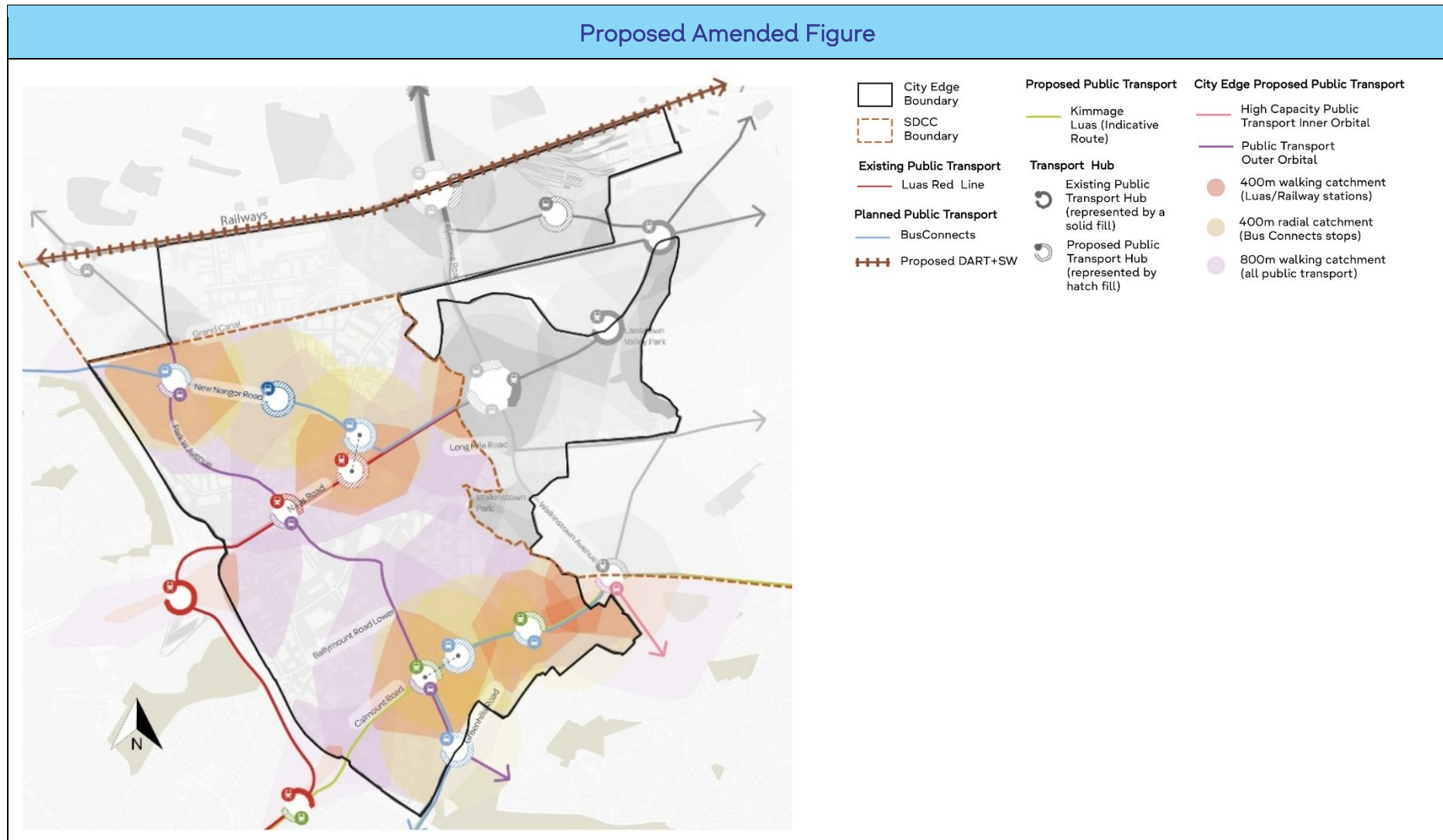


Figure 8: Indicative Mobility Hub Location (p.53)

Proposed Amendments:

1. Improve the clarity of street names.
2. Indicate a Mobility Hub Type 3 at the intersection of Naas Road and Oak Road.
3. Indicate the railway and Grand Canal.
4. Amend the legend accordingly

Existing Figure



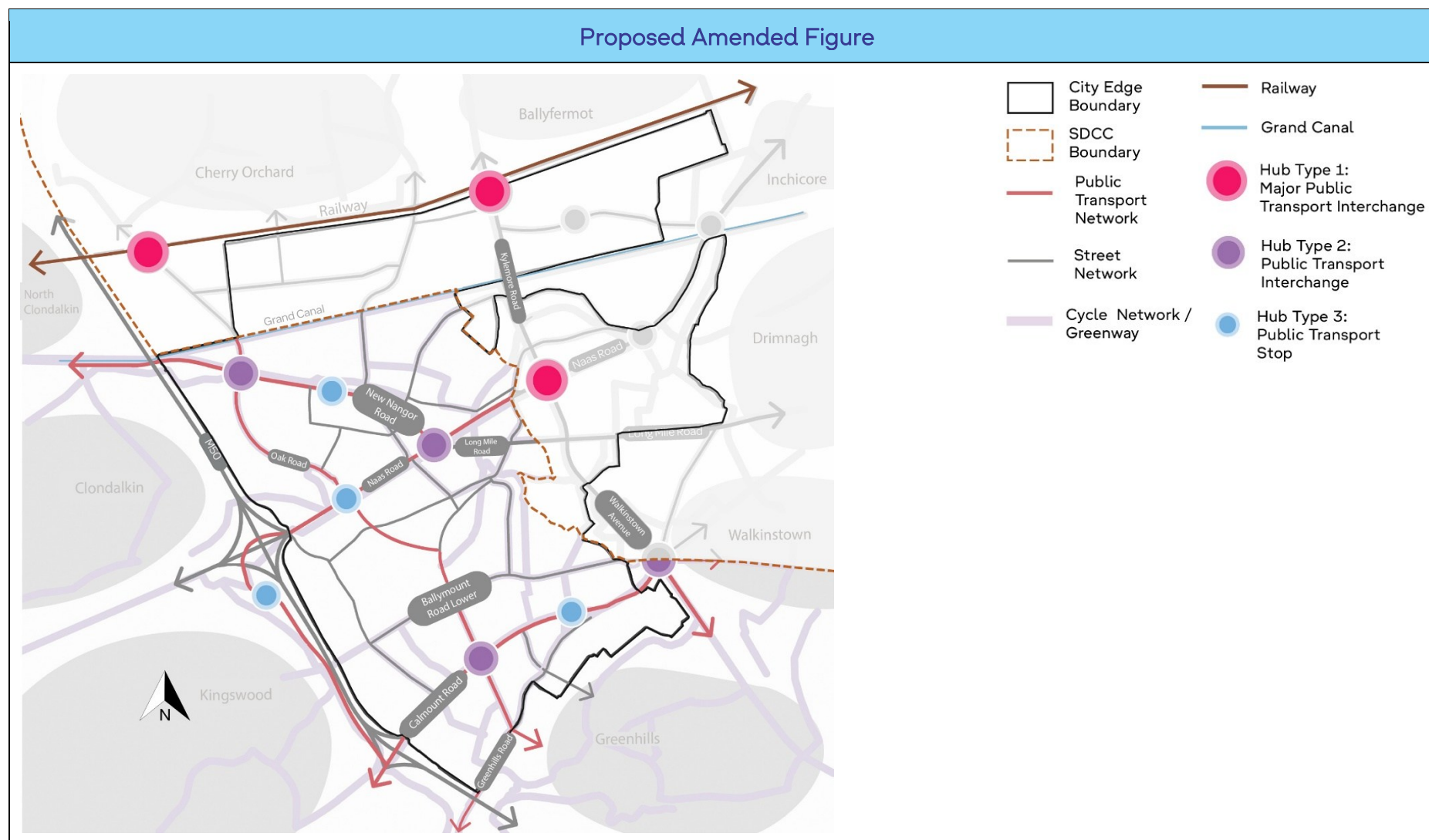
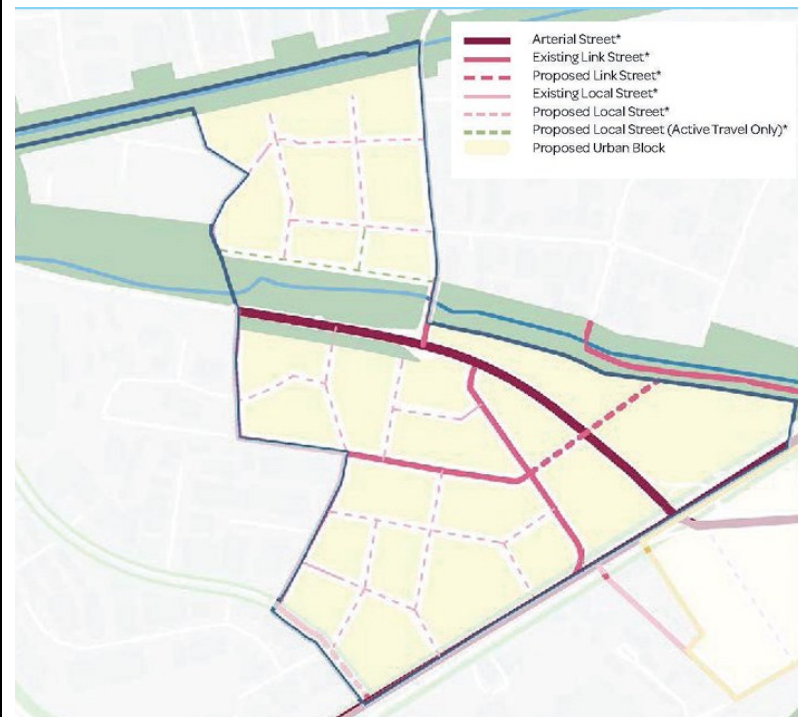


Figure 21: Street Hierarchy Diagram (p.136)

Proposed Amendments:

1. Improve the clarity of street names and colours.
2. Correctly illustrate the classification of roads.
3. Illustrate the proposed Naas Road Crossing.
4. Amend the legend accordingly.

Existing Figure



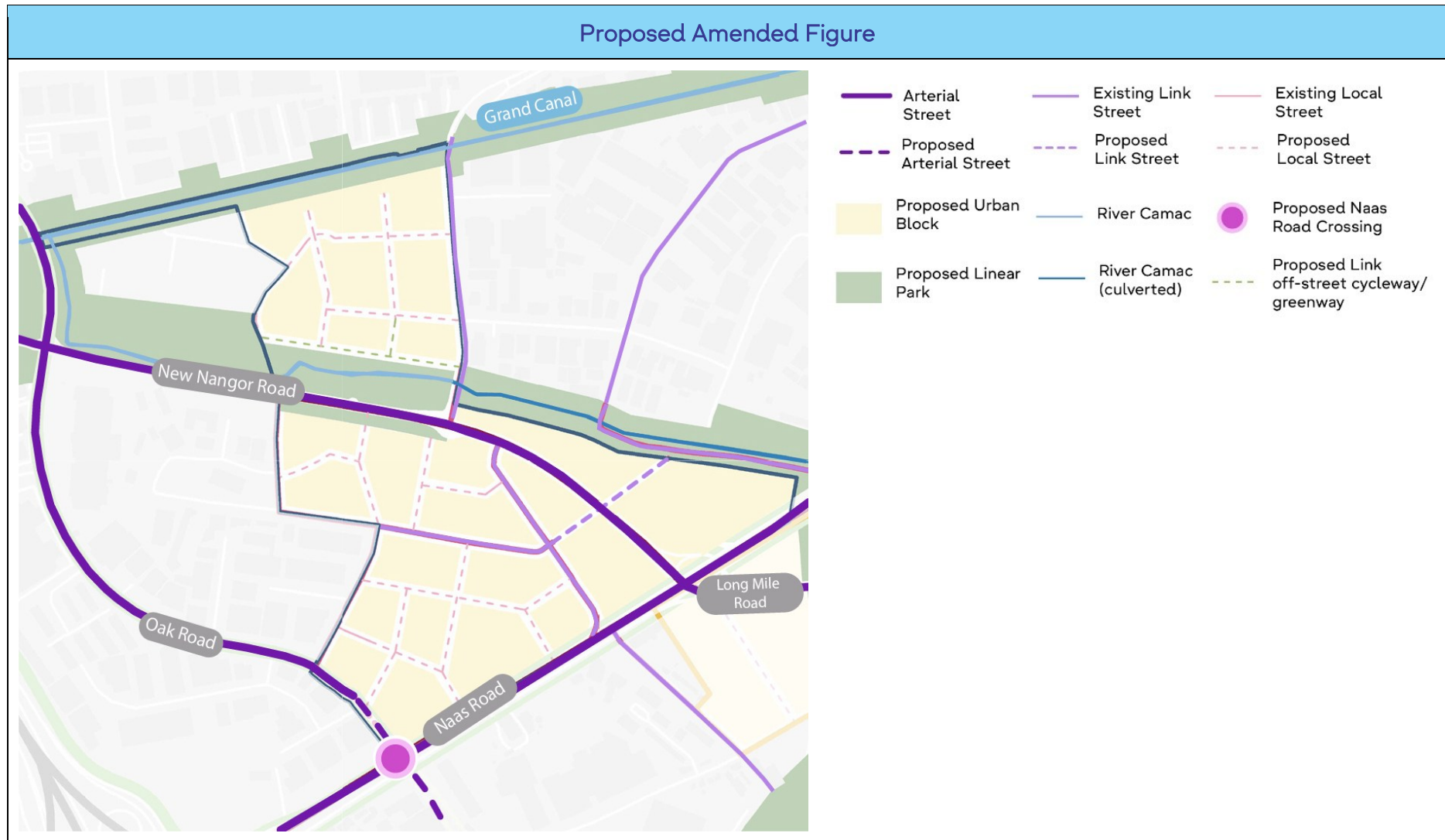
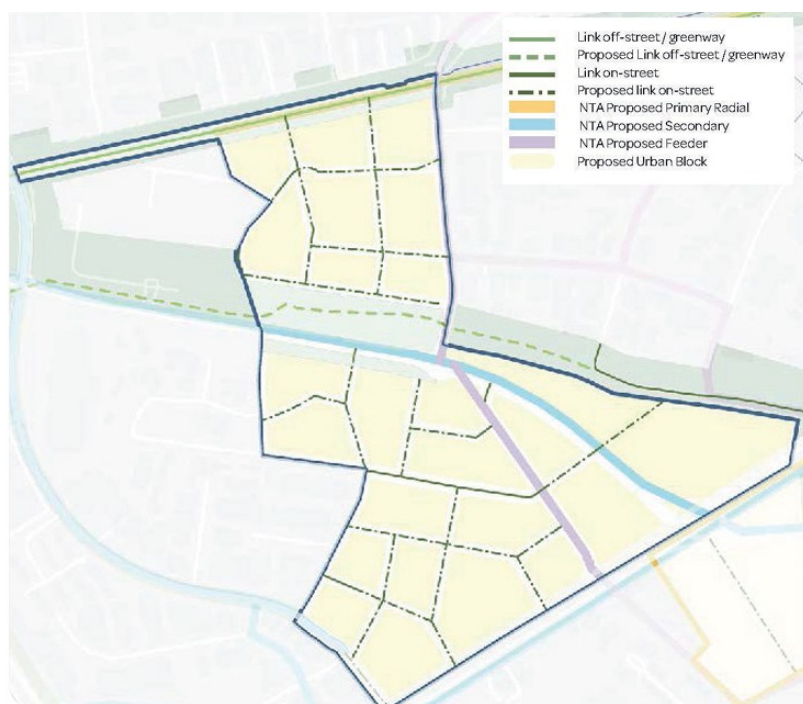


Figure 22: Cycling Network (p.137)

Proposed Amendments:

1. Improve the clarity of street names.
2. Indicate the NTA's proposed pedestrian and Cycle Bridge at the Naas Road/Long Mile Road/ Nangor Road junction.
3. Indicate the proposed Naas Road Crossing.
4. Amend the legend accordingly.

Existing Figure



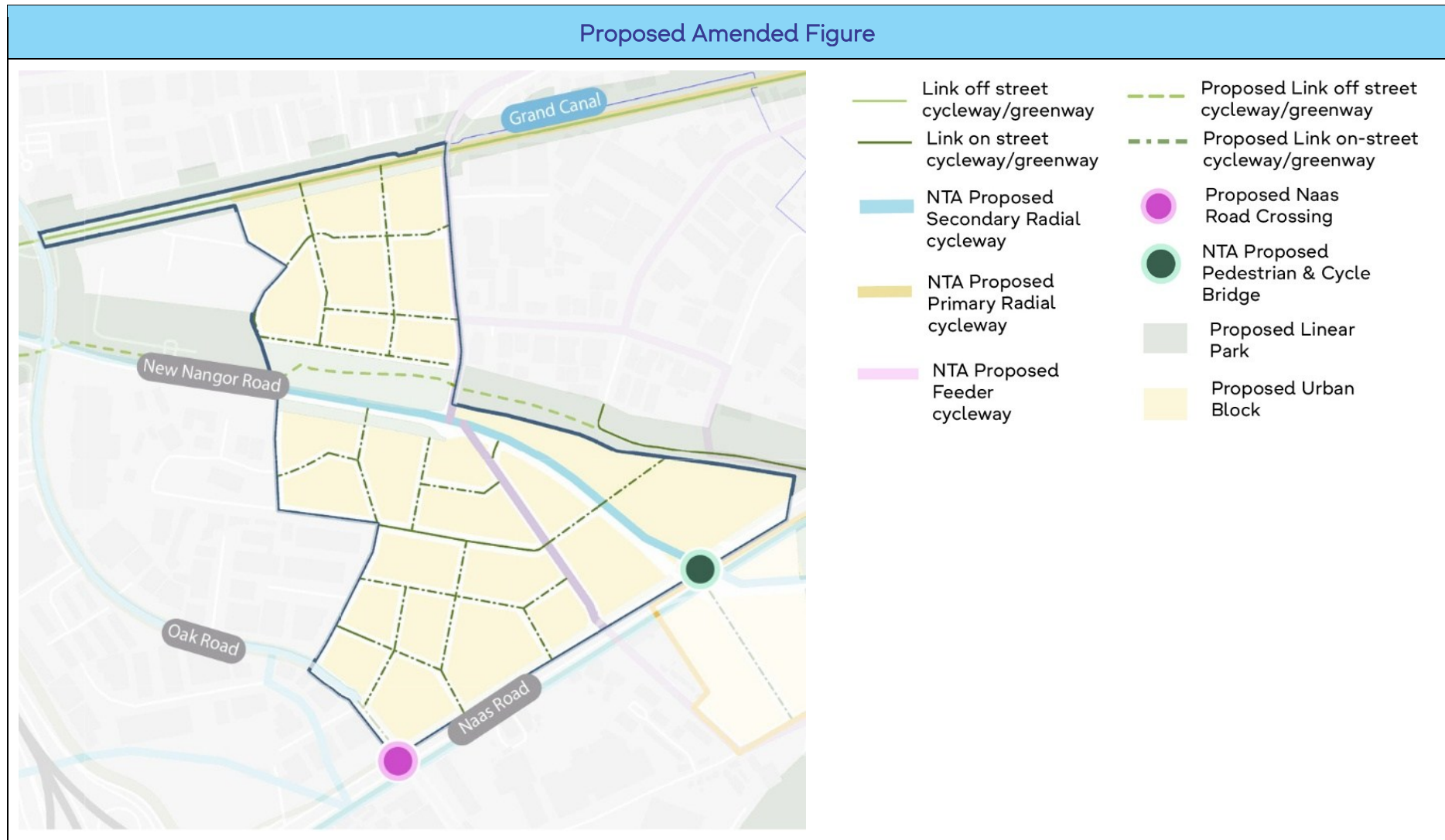
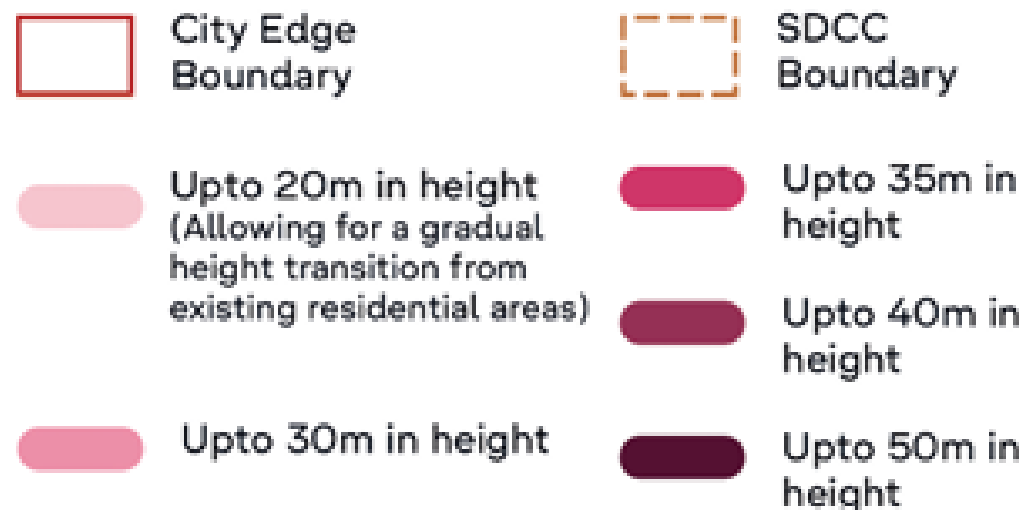


Figure 9: Indicative Building Heights (p.64)

Proposed Amendments:

1. Amend the legend for Figure 9 on page 64 by inserting the wording *'Indicative Building Heights'*.
2. Insert text below the legend for Figure 9 on page 64 *'To be read in conjunction with Policy IOD1 Objective 3.'*

Existing Figure



Proposed Amended Figure

Indicative Building Heights



City Edge
Boundary



SDCC
Boundary



Up to 20m in height
(Approximately 6
residential storeys)
(Allowing for a gradual
height transition from
existing residential areas)



Up to 35m in height
(Approximately 10.5
residential storeys)



Up to 40m in height
(Approximately 12
residential storeys)



Up to 30m in height
(Approximately 9
residential storeys)



Up to 50m in height
(Approximately 15
residential storeys)

Note:

- The residential storeys are assumed to be 3.2m floor to floor.
- The number of storeys have been approximated down.
- Indicative building heights map to be read in conjunction with IOD1 Objective 3 on page 65.