

Variation No. 3
Senior Executive Officer, Forward Planning Section
Planning and Transport
South Dublin County Council
County Hall
Tallaght
Dublin 24

Online submission: <https://consult.sdblincoco.ie/>

Dáta | Date 5 August 2026

Ár dTag|Our Ref. TII 26-135973

RE: Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028: Draft City Edge Strategic Urban Regeneration Framework 2026.

Dear Senior Executive Officer,

Transport Infrastructure Ireland's safeguards the strategic function of National Roads and Luas to ensure the safe and efficient operation of the national roads network in accordance with official policy.

The City Edge area is served by essential motorway, and national primary elements of the national roads network: the M550, and/M7. As the Council is aware, as part of this network the Trans-European Transport Network (TEN-T) EU Regulations identify a critical network of national roads, rail, ports and airport infrastructure. The M50 and N/M7 are identified as part of the TEN-T Core Network.

With respect to these Material Alterations, TII has reviewed the Chief Executives Report and is surprised by the commentary associated with our submission made to the Variation. TII acknowledges that the national road network is protected in the County Plan. However, it appears that statements in the CE Report which cites duplication of this national, regional and local objective is considered inappropriate. This statement appears to run counter to the numerous "duplications" of similar policies which are included in the City Edge Variation.

TII remains concerned with the lack of an acknowledgement in Section 2.5 MOVEMENT of the Draft City Edge Strategic Urban Regeneration Framework to the need to maintain the operation and safety of the M/N7 and M50 by ensuring the combined effects of wider planned investments under the GDA Strategy and the transit-focused approach at City Edge.

TII, again, warns in the absence of the delivery of the combined effects of wider planned investments under the GDA Strategy policies and associated schemes, the City Edge project would adversely impact the operation and safety of the strategic road network.

TII must repeat that the Council's transport modelling evaluation indicates that City Edge will measurably contribute to traffic volumes in the vicinity of the M50 and N7 by 2042. However, the Report suggests that delivery of the transit-focused approach including strengthened public transport provision including orbital bus and rail can temper car demand and reduce pressure on strategic corridors, with all scenarios showing reductions in M50 volumes relative to a car- oriented baseline.



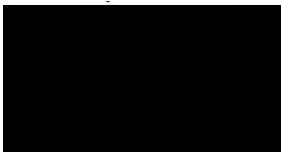
The need to protect the strategic road network would be one of the key attributes identified to support transport project investment implementation in City Edge.

It would be expected that the planning authority would clearly acknowledge these requirements and address the clerical omission in the Draft City Edge Strategic Urban Regeneration Framework. It appears that this omission is associated with a misunderstanding of the symbiotic need to both deliver the transit focused approach at City Edge and safeguarding one the most strategic locations on the national road network

TII strongly recommends that Section 2.5 MOVEMENT Draft City Edge Strategic Urban Regeneration Framework 2026 is amended to acknowledge the need to maintain the operation and safety of the MN7 and M50 in accordance with County, regional and national policies by ensuring the combined effects of wider planned investments, in public transport schemes, under the GDA Strategy are realised and the implementation of a transit focused policy approach.

Please acknowledge receipt of this submission.

Yours faithfully,

A solid black rectangular box used to redact the signature of Tara Spain.

Tara Spain, Head of Land Use Planning.
cc. NTA planning@nationaltransport.ie