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An tÚdarás Náisiúnta Iompair
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21st August 2026

Re: Material Alterations to Variation no.3 to the South Dublin County Development Plan 2022-2028

Dear Sir/Madam,

In accordance with Section 42 (8) (c) (iv) of the Planning and Development Act (2024), which states that in making a variation to a Development Plan, a planning authority shall take due account of any relevant transport strategy of the National Transport Authority (the “NTA”) which relates to all or any part of the functional area of the planning authority, in this case the Greater Dublin Area Transport Strategy, the NTA makes the following observations and recommendations.

1. Material Alterations related to NTA Recommendations at Draft Stage

The NTA welcomes the inclusion of the majority of recommendations made at the draft variation stage and are of the view that the associated alterations have strengthened the SURF Strategy and, by extension, will strengthen the South Dublin County Development Plan if adopted. Of particular note in this regard is MA 2.22 related to density and density gradients.

The NTA also notes that a number of our recommendations have not been taken forward as recommended, in particular those related to the following aspects:

- Reference to the Cycle Design Manual in Section 2.5.3;
- Reference to the need to reserve space for orbital public transport;
- Clarity in relation to shared parking for bicycles; and
- Absence of reference to Spatial Planning and National Roads S.28 Guidelines.

On review of the material provided with the Material Alterations, the NTA is of the view that, while direct reference to, or clarification of, the above matters in a comprehensive manner within the SURF would be desirable, reference to the County Development Plan and regional and national plans, policies and programmes, may be sufficient.

NTA Recommendation

The NTA recommends that all Material Alterations which relate to the NTA submission made at Draft Variation stage are approved by the local authority.

2. Other Proposed Material Alterations

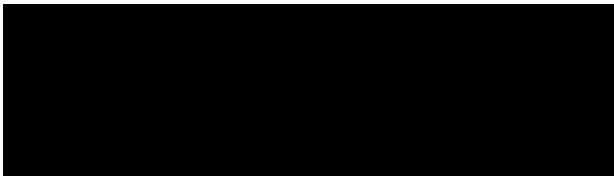
The NTA welcomes Material Alteration MA 2.27 which sets out principles related to school location and design and provides for the preparation of Safe Routes to School Strategies. School travel is a significant source of peak-hour travel demand and the NTA supports policies and objectives which seek to accommodate a greater proportion of this demand by walking, cycling and public transport.

NTA Recommendation

The NTA recommends that Material Alteration MA 2.27 is approved by the local authority.

I trust that the views of the NTA will be considered in the assessment of the proposed Material Alterations to Variation no.3 to the South Dublin County Development Plan. The NTA looks forward to continued work with the Local Authorities in relation to City Edge.

Yours sincerely,



David Clements
Senior Land Use and Transport Planner