



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

20th August 2026

Re: Proposed Material Alterations to Proposed Variation No. 3 (City Edge Strategic Urban Regeneration Framework) to the South Dublin County Development Plan 2022-2028

Dear Sir/Madam

I refer to the above. The Department of Education and Youth wish to make the following submission to the Proposed Material Alterations to Proposed Variation No. 3 (City Edge Strategic Urban Regeneration Framework) to the South Dublin County Development Plan 2022-2028. The department has considered the above document. In reference to the proposed material amendments to the variation, the department notes the following.

Proposed Material Amendment No. 25

The department welcomes amendment 25, which adds the additional text in reference to special education needs requirements.

“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 and special education needs requirements’.”

Proposed Material Amendment No. 27

In the context of Material Amendment No 27, the department would like to state the following:

The Department of Education and Youth supports the objective of ensuring that all proposed school sites are connected by direct, safe and universally accessible pedestrian and cycle routes linking surrounding residential areas, public transport services, parks and community facilities. The department also recognises the value of a Safe Routes to School Strategy in promoting active travel and facilitating safe access to school facilities.

However, the department has concerns regarding the wording and placement of the proposed policy objective. The measures identified within the proposed objective, including pedestrian and cycling infrastructure, active travel networks, universal accessibility measures and associated road safety infrastructure, are matters that



extend beyond the provision of school infrastructure and form part of the wider transport and public realm infrastructure required to serve the entire development area.

The proposed wording could be interpreted as placing responsibility on the Department of Education and Youth, or on a school development proposal, to demonstrate, coordinate or facilitate the delivery of infrastructure that lies outside the department's statutory remit and operational control. The department's remit is limited to the planning and delivery of school infrastructure and does not extend to the delivery of public transport infrastructure, active travel networks, pedestrian connectivity measures, cycleways, footpaths or wider road safety improvements.

The department considers that safe and universally accessible pedestrian and cycle networks should form part of the overall development framework for the area and should be planned and delivered in advance of, or independently from, the requirement for school infrastructure arising. Such infrastructure should support the creation of sustainable communities from the outset and should not be dependent upon, triggered by, or linked to the submission of a planning application for a school.

Furthermore, the department is concerned that the proposed wording could inadvertently create a situation whereby the delivery of essential school infrastructure is dependent upon the completion of matters that are outside the department's control. This could have the unintended consequence of delaying the delivery of much-needed school accommodation in circumstances where a requirement for additional school places has been identified.

Accordingly, the department recommends that the proposed policy objective not be a Policy "SCCA1" Schools Objective but should be a Policy "MOV1" Active Travel Objective to clarify that the provision of pedestrian, cycle, accessibility and road safety infrastructure is not a function of the Department of Education and Youth and that such infrastructure should be planned and delivered as part of the wider development area infrastructure framework rather than through the school planning process, with the following revised wording:

To ensure that all lands within the development area, including residential areas, school sites, parks, community facilities and public transport nodes, are connected by direct, safe and universally accessible pedestrian and cycle routes. A Safe Routes to School Strategy shall be incorporated within the overall master planning of the area and shall identify the infrastructure required to facilitate safe and sustainable access to future school sites. The required active travel, accessibility and road safety infrastructure shall be delivered as strategic enabling infrastructure in advance of, or in tandem with, the need for school infrastructure arising within the area.

Proposed Material Amendment No. 48

The department notes the proposed amendment to amend all relevant maps/figures relating to the Red Cow & Cherry Orchard PDA to relocate the indicative school site outside of Flood Zone B as shown on Figure 25 of the SURF



Proposed Material Amendment No. 49

The department notes that in reference to Table 14 of the SURF MA 49 proposes to amend the text of Note E of the PDA Development Guidance Tables from “School numbers to be determined based on demand reflecting growth and latent availability” to “School numbers to be determined based on demand reflecting growth and latent availability, in consultation with the Department of Education and Youth.”

Proposed Material Amendment No. 50

The department notes that in reference to Table 16 of the SURF, MA 50 proposes to amend the text of Note E of the PDA Development Guidance Tables from “School numbers to be determined based on demand reflecting growth and latent availability” to “School numbers to be determined based on demand reflecting growth and latent availability, in consultation with the Department of Education and Youth.”

Proposed Material Amendment No. 51

The department notes that in reference to Table 18 of the SURF, MA 51 proposes to amend the text of Note E of the PDA Development Guidance Tables from “School numbers to be determined based on demand reflecting growth and latent availability” to “School numbers to be determined based on demand reflecting growth and latent availability, in consultation with the Department of Education and Youth.”

Proposed Material Amendment No. 56

The department notes the proposed amendment to amend all relevant maps/figures relating to the Red Cow & Cherry Orchard PDA to relocate the indicative school site outside of Flood Zone B as shown on Figure 5-2 of the City Edge SURF – Strategic Flood Risk Assessment.

The department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs. We look forward to continuing to work with you.

If you have any queries in respect of the above, please feel free to contact me.

Yours sincerely,


Mairead Garry
Statutory Plans
Forward Planning Section