



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

12th May 2026

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

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

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 3 (proposed Variation) to the South Dublin County Development Plan 2022-2028 (Development Plan).

As South Dublin County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address any recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding

particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The proposed Variation proposes to insert the City Edge Strategic Urban Regeneration Framework (SURF) as an appendix to the Development Plan, covering approximately 440ha within South Dublin County and forming part of the wider 700ha City Edge project with Dublin City Council. The Office recognises the significant potential of these 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 also welcomes the Planning Authority's strong collaboration with Dublin City Council, infrastructure providers and key stakeholders to ensure coordinated delivery of infrastructure, public transport, housing and employment in line with National Policy Objectives. It is acknowledged that the City Edge SURF is identified as a planning framework for the purposes of candidate Urban Development Zone 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.

For clarity, this submission also refers to proposed Variation No. 2 to the Development Plan concerning NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines). The public consultation period for Variation No. 2 closed on 13th March 2026.

The Office welcomes the integration of the City Edge SURF into the Development Plan in support of the core strategy, alongside the Planning Authority’s continued collaboration with Dublin City Council and key stakeholders.

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 identifies some areas for review and clarification in relation to the core strategy figures and proposed density ranges.

In addition, the Office raises concerns regarding aspects of the Strategic Flood Risk Assessment (SFRA), including the content of the Plan Making Justification Test (Justification Test), the location of one of the proposed school locations within the Red Cow and Cherry Orchard PDAs which is located within Flood Zone B, and the use of outdated datasets, all of which should be addressed in line with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The City Edge SURF should also be updated to reflect emerging transport policies, including the forthcoming National Transport Authority (NTA) Greater Dublin Area Transport Strategy 2022-2042 review and active travel guidance.

Finally, the Office considers that the implementation section would benefit from identifying short to medium-term deliverables within the PDAs, supported by a clear monitoring framework to track progress.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out two (2) recommendations and four (4) observations under the following key themes:

Key theme	Recommendation	Observation
Core strategy and residential land provisions	-	Observation 1
Densities and compact growth	Recommendation 1	-

Flood risk management	Recommendation 2	-
Integration of land use planning and public transport provisions	-	Observation 2
Implementation and monitoring	-	Observation 3
Development outside of the three Priority Development Areas	-	Observation 4

1. Core strategy and residential land provisions

The adopted Development Plan core strategy table 8 refers to Land Capacity within Strategic Development Areas including the City Edge lands, it 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.

It is noted that the Chief Executive’s Report prepared by the Planning Authority in October 2025 relating to the Housing Growth Guidelines identifies that the majority of the City Edge is categorised as Long Term Zoned Land Capacity and that it is not anticipated that significant development will occur prior to 2030.

Furthermore, in terms of timeframes the proposed Variation chapter 3, section 3.2 of the City Edge SURF identifies that the expectation is that the 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.

As an example, table 8 of the proposed Variation No. 2 sets out the Total Land Capacity within existing Strategic Development Areas, 2025, it identifies that there are 239.9ha

brownfield and 8.4ha greenfield at City Edge and identifies the remaining unit capacity of these lands from 2025 is 22,100¹. While it is acknowledged that the final figures relating to City Edge will be subject to the City Edge statutory plan as indicated by the footnote to table 8, it is noted that the quantum of land at City Edge and the overall unit capacity referenced within the core strategy tables presented in Variation No. 2 do not appear to correspond with information set out in the City Edge SURF documentation.

The City Edge SURF documents identify that the overall lands within the South Dublin area is 440ha, and that the potential residential delivery within the three PDAs (128ha) is 9,084 units on lands that are primarily zoned as 'Regeneration' (REGEN) in the current Development Plan.

In addition, table 9 of the proposed Variation no. 2 relates to the capacity of undeveloped lands within South Dublin likely to be developable within the current and subsequent Development Plan periods, excluding long-terms zoned potential. It identifies 1.1ha of greenfield and 63.5ha residential and mixed-use lands at City Edge with a capacity to deliver 129 units and 7,694 units.

It is not clear how the quantum of land and the unit capacity figures relating to the City Edge lands within table 8 or the figures provided in table 9 of the proposed Variation No. 2 correspond to the figures relating to quantum of land and potential unit delivery set out in the City Edge SURF documentations. The Planning Authority should clarify and clearly explain this within the City Edge SURF documentation. This is particularly important given the stated expectation within chapter 3, section 3.2 of the proposed Variation that the three PDAs will be developed over the next 10-15 years.

Observation 1 - Core Strategy and Residential Land provisions

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

¹ There is a footnoted added to this figure in the proposed Variation No. 2 to the Development Plan which states that '*Final Figure will be subject to the City Edge statutory plan.*'

- the Development Plans, Guidelines for Planning Authorities (2022) section 3.9 relating to variation of 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 is to:

- (i) 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 9 of the proposed Variation No. 2 the Development Plan correspond to the figures relating to quantum of land and potential unit delivery set out in the City Edge SURF documentations.

2. Delivering sustainable communities and compact growth

In relation to residential densities, the Office welcomes the reference in chapter 1, section 1.4.2 of the proposed Variation to the Compact Settlements Guidelines. The proposed Variation stated that ‘the recommended methodology for calculating density has been applied in the formulation of the layouts and capacities set out in this SURF’.

The City Edge SURF documents identify that the three proposed PDAs are largely zoned as REGEN. The proposed Variation No. 2 table 5.1 relating to appropriate density ranges as per the Compact Settlements Guidelines relating to Dublin City and Suburbs indicates that density ranges (net) 50-250 dph shall generally be applied in relation to REGEN lands and that forthcoming plans for City Edge would further refine densities.

While the Office acknowledges that the City Edge SURF documents refer to Plot Ratio, it is noted that in chapter 2 and chapter 3 of the City Edge SURF that there are generalised references to densities. As a result, it is not clear what densities or density ranges are proposed within the overall City Edge lands within the administrative area of South Dublin County nor in the three PDAs at Red Cow & Cherry Orchard, Long Mile and Greenhills. The Office 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 Settlements Guidelines.

Recommendation 1 - Delivering sustainable communities and compact growth

In order to deliver compact growth and support the co-ordinated and sustainable development of communities at appropriate densities, and having considered the following:

- NPO 8 and 10 of the NPF and RPO 3.2 and 3.3 of the RSES to deliver compact growth;
- NPO 45 of the NPF to increase residential density in settlements through a range of measures including area or site based regeneration;
- RPO 4.3 of the RSES supporting the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within existing built up area of Dublin City and suburbs; and
- the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines), (sections 3.0 Settlement, Place and Density, section 4.2 Role of Statutory Development Plan, 4.3 Urban Design and Quality Placemaking Processes) and Policy and Objective 3.1 which requires that the recommended residential density ranges set out in section 3.3 be applied through statutory development plans,

the Office recommends that the Planning Authority:

- (i) set out the residential densities which are to be applied to the City Edge Strategic Urban Regeneration Framework lands within the South Dublin administrative area and demonstrate compliance with the Compact Settlements Guidelines; and
- (ii) set out the residential densities which are to be applied in the three Priority Development Areas at Red Cow & Cherry Orchard, Long Mile and Greenhills and demonstrate how they comply with the Compact Settlements Guidelines.

3. Flood risk management

The Office welcomes the preparation of the SFRA to inform the City Edge SURF. There are, however, some concerns with the content of the SFRA including:

- the Justification Test for the three PDAs at Red Cow & Cherry Orchard PDA, Long Mile PDA and Greenhills PDA have not been carried out in accordance with the Flood Guidelines;
- figure 5.2 of the SFRA relating to Red Cow & Cherry Orchard Flood Zone A & B Map shows that one of the indicative school locations within this PDA is within Flood Zone B. As highly vulnerable development, schools are not appropriate in Flood Zone B;
- the SFRA utilises superseded PFRA indicative flood maps datasets.

The Office recommends the Planning Authority to review and amend accordingly. The Planning Authority is advised to actively engage with the OPW on these matters.

Recommendation 2 - Flood Risk Management

Having regard to flood risk management, and having considered the following:

- NPO 78 of the NPF relating to the avoiding of inappropriate development in areas at risk of flooding;
- RPO 7.12 of the RSES which seeks to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines);
- policy IE 4 of the South Dublin County Development Plan 2022-2028 relating to flood risk to ensure the continued incorporation of Flood Risk Management into the spatial planning of the County; and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) review and amend the Strategic Flood Risk Assessment (SFRA) to ensure that the Plan Making Justification Test (Justification Test) is fully consistent with the Flood Guidelines with respect to whether the Justification Test criteria has 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 development (Flood Zone A or B) or less vulnerable development (Flood Zone A) that does 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 indicative school located within Flood Zone B shown on figure 5-2 of the SFRA relating to the Red Cow & Cherry Orchard Priority Development Area (PDA), update the PDA layout accordingly throughout the City Edge Strategic Urban Regeneration Framework 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.

4. Land use planning and transportation

The NTA Greater Dublin Area Transport Strategy 2022-2042 is the subject of review every six years. The next review of the strategy is to commence in 2027. It is noted that section 42(8)(c)(iv) of the Act, states that in making a variation to a 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 a result, the City Edge SURF should refer to the forthcoming review of the strategy and the need for alignment with any future Strategy review.

The Office also identifies additional updates to refer to the content of the NTA Cycle Design Manual and to maintain the carrying capacity and safety of the strategic road network.

Observation 2 - Land Use Planning and Transportation

Having regard to the need to integrate land use and sustainable transport planning and healthy placemaking the Planning Authority is advised to:

- (i) update chapter 2, section 2.5.4 of the City Edge Strategic Urban Regeneration Framework (SURF) which deals with Public Transport - Existing, Planned, Proposed to refer to the review of the National Transport Authority, 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 M50 and N7 and the need to protect the strategic road network

5. 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 of the plan making process including:

- potential short and medium term deliverables - While noting that the City Edge SURF proposals will span several Development Plan cycles, it would be beneficial to clarify if there are short to medium term deliverables which may be achieved and factored into the phasing strategy within the City Edge lands, in particular deliverables relating to the three PDAs which the Planning Authority anticipates will be developed in the next 10-15 years; and
- a monitoring programme - The implementation chapter would benefit from the inclusion of a formal monitoring programme which may include reporting timelines, evaluation criteria and reporting for the City Edge SURF proposals to measure progress and to ensure environmental policies and objectives within the Development Plan are monitored as part of the wider City Edge project being progressed in conjunction with Dublin City Council and key stakeholders.

Observation 3 - Implementation and Monitoring

Having regard to the need to ensure the timely and coordinated implementation of all supporting elements of the City Edge Strategic Urban Regeneration Framework (SURF) with respect to the delivery of housing and having considered NPO 108 of the NPF related 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 deliverables which may be achieved and factored into the phasing strategy within City Edge lands, in particular within the three Priority Development Areas; and
- (ii) set out the details of the proposed monitoring programme for the City Edge SURF proposals in order to measure progress and to ensure environmental policies and objectives within the South Dublin County Development Plan 2022-2028 are monitored.

6. Development outside of the three Priority Development Areas

The Office supports the identification of the three PDAs which the Planning Authority identifies will be the focus of development over the next 10-15 years. It is noted that PDA4 Objective 1 identifies that 'Save for exceptional circumstances' significant new residential and high intensity employment outside the PDA will be considered premature. The Planning Authority should clarify what the criteria for the exceptional circumstances and identify how they are to be demonstrated and address this in the City Edge documentation.

Observation 4 - Development outside the 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 PDA4 Objective 1 and how they are to be demonstrated. This should be addressed within the City Edge Strategic Urban Regeneration Framework.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and the manner in which the Chief Executive proposes to address them.

Where a Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where an authority decides not to comply with

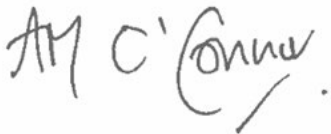
the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015