

South Dublin County Development Plan 2022-2028

Proposed Variation No 3

City Edge Strategic Urban Regeneration Framework 2026

Chief Executive's Report on the
Proposed Material Alterations

October 2026

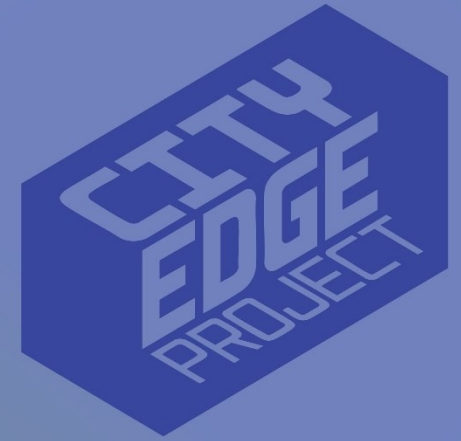


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Abbreviations

AA – Appropriate Assessment

CFRAM – Catchment Flood Risk Assessment and Management

CDP – County Development Plan

CE – Chief Executive

DECLG – Department of Environment, Community and Local Government.

DEY – Department of Education and Youth

GDATS – Greater Dublin Area Transport Strategy

HEFS – High End Future Scenario

MASP – Metropolitan Area Strategic Plan

NIFM – National Indicative Fluvial Mapping

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

PFRA – Preliminary Flood Risk Assessment

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 Context

Proposed Variation No.3 to the South Dublin County Development Plan 2022-2028, which comprises the **City Edge Strategic Urban Regeneration Framework (SURF)**, intends to fulfil Policy CS2 of the South Dublin County Development Plan 2022-2028 to '**deliver a framework for the regeneration of the City Edge lands....**'. The intention is that the SURF will be incorporated as an appendix to the County Development Plan and will inform proposals and assessments of 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.

In accordance with Section 58 (7) and (8) of the Planning and Development Act 2024 (as amended), Proposed Variation No. 3 and accompanying documents were put on public display between 13th April 2026 and 12th May 2026. A total of 40 submissions / observations were received and a Chief Executive's Report on the submissions and observations was prepared and submitted to the Elected Members of South Dublin County Council for their consideration at a Council meeting held on the 13th July 2026.

At the Council meeting, it was resolved by the Elected Members to modify proposed Variation No. 3 to the South Dublin County Development Plan 2022 - 2028. As a number of the modifications constituted Material Alterations (MAs) to the proposed Variation, further public consultation was required, as per Section 58 (13) of the Act.

In accordance with Section 58 (13) of the Planning and Development Act 2024 (as amended) and in the interests of engaging with stakeholders to inform the Draft City Edge Strategic Urban Regeneration Framework (SURF), the proposed Material Alterations to the Proposed Variation were put on public display during a four-week period from Friday 24th July to Friday 21st August inclusive.

In accordance with Section 58(13)(f)(ii), the notice on the Council's Consultation Portal and the report on the Proposed Material Alterations clarified that:

'Only submissions or observations made in respect of the proposed Material Alterations and accompanying documents will be taken into consideration before the making of any Material Alteration to Variation No. 3 to the South Dublin County Development Plan 2022-2028. Submissions or observations in relation to other aspects of Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028 cannot be considered at this stage.'

The public consultation campaign involved the following elements:

- Notices were placed in the Irish Times on 24th July 2026 and the Echo on 30th July 2026 and letters of notification along with copies of the proposed Material Alterations (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):
 - [Proposed Material Alterations to Proposed Variation No. 3 to the South Dublin County Development Plan 2022 - 2028](#)
 - [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 five posts were made on the platforms (on 27th July 2026 and 3rd, 10th, 17th and 21st August 2026) announcing the opening of the online consultation portal, containing a link to the public consultation portal and containing reminders regarding the closing date for submissions.

1.2 Breakdown of Submissions / Observations Received

A total of 14 submissions were received during the four-week consultation period.

Of the 14 submissions received, 12 were from organisations while 2 were from individuals. Of the 12 submissions from organisations, 10 were from state bodies including prescribed bodies and infrastructure and service providers while 2 were from private organisations.

The 14 submissions referred to 14 Material Alterations, as set out in the table below. Nine submissions raised topics that were outside the scope of this round of public consultation.

Material Alterations Summary Table			
Material Alteration Ref:	Short Summary	Number of times Issue raised in Submissions relating to each MA	Page Number in CE Report
MA2.1	Minor text change	1	23
MA2.21	Minor text change	1	25
MA2.22	Additional text added re. density ranges set out in the CDP	2	20, 26
MA2.23	Minor text change to labelling of legend for Figure 9	3	13, 28

MA2.25	Minor text change	1	30
MA2.27	New Objective re. school sites and Active Travel	2	20, 32
MA2.33	Minor text deletion within EMP1 Objective 6	1	34
MA2.39	New Objective re. Urban Tree Canopy Cover	1	36
MA3.4	Minor edits to flood maps	3	13, 38
MA3.5	Minor text edits to table 14 PDA Development Guidance Tables	1	39
MA3.6	Minor text edits to table 16 PDA Development Guidance Tables	2	41
MA3.7	Minor text edits to table 18 PDA Development Guidance Tables	2	44
MA-SFRA1.2	Minor amendments to maps and figures (figure 5-2) of the SFRA	3	13, 46
MA-SFRA1.3	Replacement of section 7 justification tests forming part of the SFRA	2	13, 47



Figure 1: Breakdown of submissions received.

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 (15) 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 submissions including recommendations and submissions made by the Office of the Planning Regulator (OPR) and submissions made by the National Transport Authority (NTA). [It is noted that no

submissions were made by the Minister or the Eastern and Midland Regional Authority who are also specifically referred to in the relevant section of the Act];

- Summarises the submissions made by any other persons, and where considered appropriate, groups and summarises the issues raised in submissions on a thematic basis;
- Sets out the recommendations of the Chief Executive as to how any recommendations made by the Minister [note that no submissions were received from the Minister] and the Office of the Planning Regulator should be taken account of in relation to the modification to the proposed Variation;
- Gives the response of the Chief Executive to the matters raised in the submissions, and the recommendations of the Chief Executive in relation to the modification to the proposed Variation, and
- Where required, includes the assessment of the Chief Executive of the proposed Material Alterations for the purposes of strategic environmental assessment (SEA) or appropriate assessment (AA), with consideration of the submissions received. In this regard, it was determined that none of the minor modifications proposed in this report, which have arisen from the submissions received on the proposed Material Alterations, have implications for SEA or AA.

In accordance with Section 58(16)(a) of the Planning and Development Act, 2024 (as amended), the members of a planning authority shall consider the modification and the report of the Chief Executive. Thereafter, in accordance with Section 58(17) of the Planning and Development Act, 2024 (as amended), the members of a planning authority shall, by resolution, either

- i) make the variation as originally proposed by the planning authority,
- ii) make the variation with the material alteration that was the subject of the notice under subsection (13), or
- iii) refuse to make the variation.

Where the members of a planning authority decide to make the Variation with the Material Alterations, they may do so subject to any further minor modifications to the alteration that they consider appropriate. A modification to the material alteration shall be deemed to be minor where it—

- i. does not substantially or materially alter the Material Alteration,
- ii. is not likely to have significant effects on the environment or on any European site, and
- iii. does not relate to—
 - I. an increase in the area of land zoned for any purpose, or
 - II. an addition to or deletion from the record of protected structures.

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 context; description of public consultation including a breakdown of submissions received; describes purpose, structure and navigation of report; and lists submissions received and persons who made submissions.

Section 2: Specified Prescribed Bodies - Summaries of Submissions, Recommendations and Response of Chief Executive

As per Section 58(15) of the Act, Section 2 of this document 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.

Section 3: General Submission Summaries and Chief Executive Responses and Recommendations

Contains summaries of issues raised by the submissions in relation to the relevant proposed Material Alteration, sets out the responses and recommendations of the Chief Executive on the issues raised and provides links to the relevant submissions.

Section 4: Submissions that are Outside the Scope of the Provisions of the Act

The notice on the consultation portal and the report on the Proposed Material Amendments which were published as part of this public consultation exercise stated that:

‘Only submissions or observations made in respect of the proposed Material Alterations and accompanying documents will be taken into consideration before the making of any Material Alteration to Variation No. 3 to

the South Dublin County Development Plan 2022-2028. Submissions or observations in relation to other aspects of Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028 cannot be considered at this stage.'

There are instances where submissions have raised matters not related to a specific Material Alteration. Section 4 provides a brief summary of such issues raised in submissions that were deemed to be out of scope and gives reasons why.

1.5 Navigating the Chief Executive's Report

In this Chief Executive's Report, submissions have generally been grouped and summarised by Material Alteration Reference (e.g. MA2.2) 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. For ease of reference, each Material Alteration referenced in the submissions, has been included as they appeared in the consultation portal. They are followed by several columns, which are set out in this manner: The first column outlines the submission URN containing observations pertaining to the Material Alteration reference; the second column outlines the summarised points; while the third column follows with the CE Response and Recommendation.

1.6 How to Read the Chief Executive's Recommendations

In response to submissions received, the Chief Executive may recommend some minor modifications to the text of the proposed Material Alteration. In these instances, the existing text of the proposed Material Alteration is shown in black; the proposed deletions in ~~red strikethrough~~; and proposed minor modifications or new text *in bold, italic green*.

1.7 Minor Corrections and Clarifications not contained in the CE Report

There are likely to be instances where minor corrections and clarifications 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 Submissions Received and Persons who made Submissions

List of Submissions Received		
Submission URN	Submission Name / Author	Individual / Organisation
<u>SD-C442-1</u>	Azlina Abd Rahman	Private Individual
<u>SD-C442-2</u>	Transport Infrastructure Ireland	Public Organisation
<u>SD-C442-3</u>	Proinsias Mac Fhlannchadha	Private Individual
<u>SD-C442-4</u>	The Maritime Area Regulatory Authority	Public Organisation
<u>SD-C442-5</u>	Uisce Eireann (Irish Water)	Public Organisation
<u>SD-C442-6</u>	National Transport Authority	Public Organisation
<u>SD-C442-7</u>	Environmental Protection Agency	Public Organisation
<u>SD-C442-8</u>	Office of Public Works	Public Organisation
<u>SD-C442-9</u>	Department of Education and Youth	Public Organisation
<u>SD-C442-10</u>	Electricity Supply Board	Public Organisation
<u>SD-C442-11</u>	C Duffy Properties (c/o Tom Phillips and Associates Planning Consultants)	Private Organisation

<u>SD-C442-12</u>	B&G Ltd (c/o Tom Phillips and Associates Planning Consultants)	Private Organisation
<u>SD-C442-13</u>	An Taisce - The National Trust for Ireland	Public Organisation
<u>SD-C442-14</u>	Office of the Planning Regulator	Public Organisation

Section 2: Specified Prescribed Bodies – Summaries of Submissions, Recommendations and Chief Executive's Response

2.1 Office of the Planning Regulator: Submissions and Recommendations – URN: SD-C442-14

Recommendation 1 – Flood Risk Management (MA-SFRA1.3):

The OPR makes one **Recommendation** referred to as 'MA Recommendation 1' in relation to the proposed Material Alterations which is summarised below:

The OPR states that further clarification is required to demonstrate compliance with 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)' (Flood Guidelines). Specifically, the updated Justification Tests submitted under MA-SFRA1.3 provide a general response to criterion 2(iii) of Box 4.1 of the Flood Guidelines – i.e. demonstration that a zoning or designation is 'within or adjoining the core of an established or designated urban settlement'. Under the Flood Guidelines, however, this criterion should be addressed on a site-specific basis. Accordingly, a modification should be included to clearly demonstrate how each area subject to a Plan Making Justification Test (Justification Test) satisfies this criterion.

MA Recommendation 1 – Flood Risk Management:

Having regard to flood risk management and having considered relevant policies and objectives of the NPF, RSES, South Dublin County Development Plan 2022-2028, and the Flood Guidelines, the Office recommends that the Planning Authority makes a modification to the text within the Justification Tests to clarify if the zoning is within or adjoining the core to satisfy criterion 2(iii) of Box 4.1 of the Flood Guidelines. Any zoning objective for highly vulnerable development (Flood Zone A and B) or less vulnerable development (Flood Zone A) that does not pass the Plan Making

Justification Test in accordance with the Flood Guidelines should be omitted from the adopted Variation. The Planning Authority should engage with the OPW in relation to the matters above.

CE Response:

The Planning Authority notes the submission and acknowledges the recommendation from the Office of the Planning Regulator (OPR) to modify the text within the Justification test, on a site-specific basis, in relation to how each Justification test satisfies criterion 2(iii) of Box 4.1 of the Flood Guidelines, specifically in relation to whether the relevant zoning is within or adjoining a core of an established or designated urban settlement.

The Planning Authority accepts the recommendation and in consultation with the SFRA consultant, is recommending a minor modification of the Justification Test to address criterion 2(iii). The amended text is set out in Appendix 1 *'Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)'*.

The Planning Authority further notes the OPR's recommendation that any zoning objective for highly vulnerable development in Flood Zone A and B, or less vulnerable development in Flood Zone A, that does not pass the Plan Making Justification Test in accordance with the Flood Guidelines should be omitted from the adopted Variation. The Planning Authority is satisfied that the modified Justification Tests as set out in Appendix 1 *'Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)'* demonstrates compliance with the Flood Guidelines in respect of all relevant zonings and will engage with the OPW in relation to these matters prior to adoption.

CE Recommendation:

Recommendation to make modifications to proposed Material Alteration MA-SFRA 1.3 (Section 7 Justification Tests), involving modifying the SFRA Justification Test to strengthen criterion 2(iii) to demonstrate on a site-specific basis, that the zoning designation is within or adjoining the core of an established or designated urban settlement.

Refer to Appendix 1 *'Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)'*

Recommendations 1 and 2 and Observation 3 of OPR's Initial Submission:

The OPR welcomes the fact that the proposed Material Alterations address Recommendation 1 and 2 and Observation 3 of its initial submission on the proposed Variation (relating to residential density, relocation of a school away from a flood zone and review and monitoring of the SURF, respectively).

CE Response:

The comments of the OPR welcoming the fact that particular Recommendations and Observations contained in their original submission on the Draft SURF have been addressed in the proposed Material Alterations, is acknowledged.

CE Recommendation:

No changes recommended to proposed Material Alterations.

Liaison with Camac FAS Design Team

The OPR advises that the Planning Authority liaises directly with the Camac Flood Alleviation Scheme design team prior to adoption to ensure compliance with IE4 Objective 4 of the Development Plan which includes a requirement to ensure that zoning or development proposals do not impede or prevent the progression of the scheme.

CE Response:

The Planning Authority notes the recommendation to liaise directly with the Camac Flood Alleviation Scheme design team prior to adoption to ensure that proposed zoning and development does not impede or prevent the progression of the scheme, in accordance with IE4 Objective 4 of the South Dublin County Development Plan 2022–2028.

Significant engagement has already taken place during the City Edge project to date and the Camac Flood Alleviation Design Team will be represented alongside other agencies on the City Edge Infrastructure Delivery Working Group (IDWG). The Planning Authority confirms that it will continue to engage directly with the Camac FAS design team to ensure compliance with this Development Plan objective and to support the delivery of other relevant objectives of the Draft SURF, including the renaturalisation of the River Camac, the development of a linear park along the Camac corridor, and the maintenance and reinstatement of an appropriate riparian buffer along the riverbank.

CE Recommendation:

No changes recommended to proposed Material Alterations.

Recommendation 2(iii) in OPR's Initial Submission (Preliminary Flood Risk Assessment Datasets):

Regarding Recommendation 2 (iii) (in the OPR's initial submission during the first round of public consultation on the proposed Variation) relating to the use of the most up to date data sets for the determination of flood extents within the SFRA in the proposed Material Alterations, the OPR notes that the reference to Preliminary Flood Risk Assessment (PFRA) datasets has not been amended. The OPR reminds the Planning Authority that new flood risk data sets are available and should be used in all further SFRA, and that PFRA should not be used going forward. Following the adoption of the Variation, the Section 58(17)(d) of the Act notice letter should set out the reasons for the approach followed.

CE Response:

The Planning Authority notes the submission in relation to the Preliminary Flood Risk Assessment (PFRA) datasets within the SFRA and that these datasets have not been amended in the proposed Material Alterations, as recommended previously by the OPR. Having consulted with the SFRA consultants, the Planning Authority recommends updating the maps and references within the SFRA accordingly, by replacing the Preliminary Flood Risk Assessment (PFRA) pluvial

flood mapping with more appropriate rainfall modelling (2D rain-on-grid model), with reference to the Policy SWRM1 Objective 1 in the Draft SURF to address Pluvial Flood risk through a more localised drainage assessment for each PDA.

The proposed modification is set out in *'Proposed Modification 1'* in the document *'Proposed Modifications to the SFRA'*. The Planning Authority notes the requirement for a notice letter under Section 58(17)(d) of the Act.

CE Recommendation:

Recommendation to make a modification by replacing the Preliminary Flood Risk Assessment (PFRA) pluvial flood mapping with more appropriate rainfall modelling (2D rain-on-grid model), with reference to the Policy SWRM1 Objective 1 in the Draft SURF to address Pluvial Flood risk through a more localised drainage assessment for each PDA.

Refer to *'Proposed Modification 1'* section of Appendix 1 *'Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)'*.

Material Alteration MA2.23

Regarding MA 2.23, the OPR notes that the wording to be inserted to the legend of Figure 9 of the proposed Material Alterations document differs from the text shown in Figure 9 in the Book of Maps. The Planning Authority should clarify this matter.

CE Response:

The discrepancy referred to by the OPR involves an additional note proposed to be added to the legend of Figure 9 that is shown in the book of maps, but not in the text of the proposed Material Alteration. The note states *'The number*

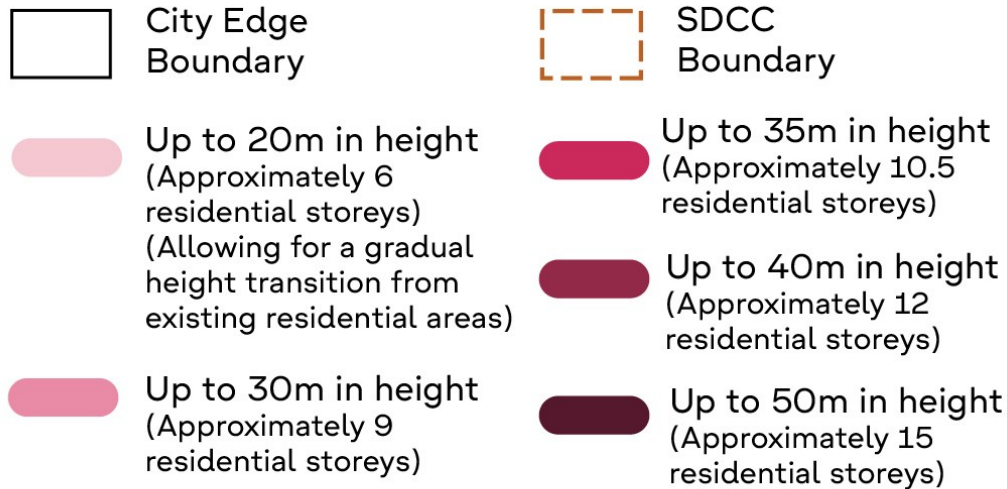
of stories has been approximated down'. The third note also varies slightly between the text in the MA ('*To be read in conjunction with Policy IOD1 Objective 3*') and the Book of Maps ('*Indicative building heights map to be read in conjunction with IOD1 Objective 3 on page 65*'). The discrepancy is noted and the text in the Book of Maps and the final draft of the SURF will be altered to align with the wording in MA 2.23.

CE Recommendation:

In the interest of clarity, modify the legend of Fig. 9 to align with the text proposed by MA 2.23, as follows:

1. Delete bullet point 1 ~~'The residential storeys are assumed to be 3.2m floor to floor'~~
2. Delete bullet point 2 text in the legend: ~~'The number of stories have been approximated down'~~.
3. Modify bullet point 3 to read as follows: '*Indicative building heights map* to be read in conjunction with Policy IOD1 Objective 3 ~~on page 65~~'

Indicative Building Heights



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.~~

Figure 2: Proposed amendments to proposed Figure 9.

2.2 National Transport Authority: Submission – URN: SD-C442-6

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 is 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 their 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.

CE Response

The support for Material Alteration MA2.22 and the contents of the submission are duly noted. The CE wishes to reiterate that that following the Variation process (and subject to Members' consideration) the SURF will comprise an appendix to the South Dublin County Development Plan 2022 – 2028 and the objectives of the County Development Plan 2022-2028 will continue to apply unless otherwise stated in the SURF (as set out on p.6 of the SURF). It is considered that the inclusion of specific policy phrasing/titles will only create unnecessary duplication. Rather, it is considered appropriate that the SURF maintains a degree of flexibility, having regard to the fact that policy documents and strategies such as the GDATS are subject to regular review cycles, and that continued engagement with the NTA and TII will ensure alignment with future iterations of transport policy. The Planning Authority is confident that the proposed SURF and corresponding Material Alterations adequately address the concerns expressed by the NTA.

CE Recommendation

No change recommended to the Proposed Material Alterations.

Other Proposed Material Alterations

The NTA welcomes proposed 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.

CE Response:

The support for Material Alteration MA2.27 is duly noted.

CE Recommendation:

No change recommended to the Proposed Material Alterations.

Section 3: General Submission Summaries and Chief Executive Responses and Recommendations

Material Alteration Reference: MA2.1		
Location in SURF: Section 2.3.2		Page No.(s): 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>		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-12: B & G Ltd (c/o Tom Phillips and Associates)	The submission expresses support for Proposed Material Alteration 2.1 which links increased density to public transport accessibility.	CE Response: The support for Proposed MA2.1 is acknowledged.

<u>Planning consultants)</u>		CE Recommendation: No change recommended to the Proposed Material Alteration.
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Material Alteration Reference: MA2.21		
Location in SURF: Section 2.6.1, 2 nd Para, Line 1		Page No.(s): 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’.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-12: B & G Ltd (c/o Tom Phillips and Associates Planning consultants)</u>	The submission supports Proposed Material Alteration MA2.21 which introduces greater flexibility regarding taller buildings within parts of the Greenhills PDA.	CE Response: The support for Proposed MA2.21 is acknowledged. CE Recommendation: No change recommended to the Proposed Material Alteration.

Material Alteration Reference: MA2.22

Location in SURF: Section 2.6.2

Page No.(s): 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 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 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 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'*.

Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-12: B & G Ltd (c/o Tom Phillips and Associates Planning consultants)</u> Refer also to the NTA submission summary relating to MA2.22, CE Response and CE Recommendation in Section 2.2 above.	The submission supports Proposed Material Alteration MA2.22 aligning density guidance with the Sustainable Residential Development and Compact Settlements Guidelines (2024)	CE Response: The support for MA2.22 is acknowledged. CE Recommendation: No change recommended to the Proposed Material Alteration.

Material Alteration Reference: MA2.23		
Location in SURF: Figure 9		Page No.(s): 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>' Refer to Section 4 below.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-11: C Duffy Properties (c/o Tom Phillips and Associates Planning consultants)</u> <u>SD-C442-12: B & G Ltd (c/o Tom Phillips and Associates Planning consultants)</u> Refer also to the OPR submission summary relating to MA2.23, the CE Response and	The submissions support Material Alteration MA2.23 which clarifies that the building height diagram is indicative and allows flexibility in the application of height guidance across City Edge.	CE Response: The support for MA2.23 is welcomed. CE Recommendation: Arising from the submission by the Office of the Planning Regulator (refer to Section 2.1 above), the following modification is proposed: In the interest of clarity, modify the legend of Fig. 9 to align with the text proposed by MA 2.23, as follows:

CE Recommendation in Section 2.1 above.		1. Delete bullet point 1 ~~'The residential storeys are assumed to be 3.2m floor to floor'~~ 2. Delete bullet point 2 text in the legend: ~~'The number of stories have been approximated down'~~. 3. Modify bullet point 3 to read as follows: <i>'Indicative building heights map'</i> to be read in conjunction with Policy IOD1 Objective 3 ~~on page 65'~~
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Material Alteration Reference: MA2.25		
Location in SURF: Policy SCCA1 Objective 1		Page No.(s): 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>.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-9: Dept. of Education and Youth	The submission welcomes the proposed Material Alteration MA2.25.	CE Response: The Planning Authority notes the support expressed in the submission relating to the proposed Material Alteration.

		CE Recommendation: No change recommended to the Proposed Material Alteration.
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Material Alteration Reference: MA2.27		
Location in SURF: Policy SCCA1		Page No.(s): 71
Add a new objective to Policy SCCA1 'Schools' as follows: <i>All proposed school sites shall be connected by direct, safe and universally accessible pedestrian and cycle routes linking surrounding residential areas, public transport, parks and community facilities. A Safe Routes to School Strategy shall be submitted as part of the first planning application relating to each school site, demonstrating compliance with Universal Design principles, active travel objectives and the delivery of the required infrastructure in tandem with, or in advance of, the occupation of the school and associated residential development.</i>		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-9: Dept. of Education and Youth Refer also to the NTA submission summary relating to MA2.27, the CE Response and CE Recommendation in Section 2.2 above.	The submission from the Department of Education and Youth supports MA2.27, which proposes the addition of a new objective relating to ensuring school sites are connected by safe and universally accessible pedestrian and cycle routes, and recognises the value of a Safe Routes to School Strategy. However, the submission raises concerns that the proposed wording of Policy SCCA1 could be interpreted as placing responsibility on the Department, or on a school planning application, to deliver transport and active travel infrastructure that falls outside its statutory remit.	CE Response: The concerns of the Department of Education and Youth are noted. An approach involving coordination between different agencies will be required for delivery of safe routes to school. As requested, it would be appropriate to locate the objective to form part of Active Travel objectives under policy MOV1.

	The Department recommends that the objective be re-designated as a Policy MOV1 Active Travel Objective to clarify that pedestrian, cycling, accessibility and road safety infrastructure is a matter for the wider development framework and should be planned and delivered in advance of, or independently from, school infrastructure requirements, so as to avoid any unintended delay to the delivery of school accommodation.	CE Recommendation: Locate 'Safe Routes to School' objective under Policy MOV1 Active Travel.
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Material Alteration Reference: MA2.33		
Location in SURF: Policy EMP1 Objective 6		Page No.(s): 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.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-13: An Taisce	Concerns expressed regarding the removal of the wording "subject to appropriate environmental safeguards..."	CE Response: The proposal to omit the wording in question is in the interests of brevity and the avoidance of

	which implies that environmental protections are a hindrance to industrial development. It is the submitter's view that this would set a worrying precedent of reducing the prominence of environmental oversight in land-use forward planning for development types which are likely to exhibit biodiversity and climate emissions impacts. Rather than framing industrial development as being at odds with environmental safeguards, an Taisce's view is that it can occur in tandem with a form of development control which balances development with biodiversity and decarbonisation outcomes. In this respect, the submitter would advocate for a reversion to the original wording of Policy EMP1 Objective 6, or at least a rationale provided for the removal of environmental safeguard wording and a subsequent stated commitment to ensuring that environmental protection is not weakened and in fact is an essential underpinning of the rollout of development in the South Dublin County Council jurisdiction.	repetition. The CE wishes to reiterate that following the Variation process (and subject to Members' consideration) the SURF will comprise an appendix of the South Dublin County Development Plan (CDP) 2022 – 2028 and that the objectives of the CDP apply unless otherwise stated in the SURF (as set out on page 6 of the SURF). In this context, and in the interests of avoiding repetition and being as concise as possible, the SURF seeks to set out policies and objectives specific to City Edge, rather than repeat general CDP policies and objectives that will automatically apply to City Edge. This is particularly relevant for longer objectives such as Policy EMP1 Objective 6. Environmental safeguarding is a fundamental objective underpinning the strategies of the CDP and SURF and it is considered that the proposed MA will have no impact on this. CE Recommendation: No change recommended to the Proposed Material Alteration.
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Material Alteration Reference: MA2.39		
Location in SURF: Policy NIOS1		Page No.(s): 90
Add a new objective to Policy NIOS1 'Natural Infrastructure and Open Space' as follows: <i>The Strategic Urban Regeneration Framework shall include a minimum urban tree canopy target for each Priority Development Area, together with quantified street tree planting requirements, the protection of existing mature trees where feasible, native species planting targets, and a monitoring framework to ensure that tree canopy delivery contributes to climate mitigation, urban cooling, biodiversity enhancement and adaptation to climate change throughout the lifetime of the development.</i>		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-13: An Taisce	The wording of MA2.39 may be strengthened by adding a reference to how the proposed urban tree cover targets and measures should implement Article 8 'Restoration of urban ecosystems' of the EU Nature Restoration Regulation (2024/1991). The Regulation contains the requirements to ensure that there is no net loss in the total national area of urban green space and of urban tree canopy cover in urban ecosystem areas; to achieve an increase in the total national area of urban green space; and an increasing trend of urban tree canopy cover in urban ecosystem areas (all subject to certain details, dates, monitoring and caveats, as set out in the Regulation).	CE Response: The SDCC Climate Action Plan (CAP) 2024-2029 seeks to increase native tree planting across the County and to retain existing native trees in the County (Action N3). The CAP contains indicators for the County's tree canopy cover including number of trees increased over annual baseline / yearly target; % increase in County's tree canopy cover; and number of trees per km of road versus the target set by Design Manual for Urban Roads and Streets (a minimum of 50 Number per km). It is considered appropriate to make references in the SURF to align with the County's CAP. This will

	This represents an opportunity for South Dublin County Council to become a pioneer in national urban greening effort and strengthens the additional Development Plan objective by demonstrating alignment with the Nature Restoration Regulation. Development Plan objectives may not have been updated since the Regulation came into force.	strengthen the wording of MA2.39 in accordance with the concern of the submitter. CE Recommendation: Modify proposed MA2.39 to read as follows: ~~The Strategic Urban Regeneration Framework shall include a minimum urban tree canopy target for each Priority Development Area, together with quantified street tree planting requirements, the protection of existing mature trees where feasible, native species planting targets, and a monitoring framework to~~To ensure that tree planting and tree canopy delivery contributes to climate mitigation, urban cooling, biodiversity enhancement and adaptation to climate change throughout the lifetime of the SURF, development within City Edge and each PDA shall align with the Council's Climate Action Plan (2024-2029) and 'Living with Trees' document (2026-2031) or any superseding documents. Tree-planting species type shall form part of the overall approach and monitoring framework.
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Material Alteration Reference: MA3.4		
Location in SURF: Figure 25		Page No.(s): 141
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. Refer to Section 4 below.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-8: Office of Public Works SD-C442-9: Dept. of Education and Youth Refer also to the OPR submission summary relating to MA2.23, the CE Response and CE Recommendation in Section 2.1 above.	The submissions from the OPW and DEY (and OPR – see Section 2.1) welcome and note the proposed amendment to relocate the indicative school site outside of Flood Zone B in Fig.25 and amend all relevant maps and figures accordingly.	CE Response: The Planning Authority notes the support expressed for the proposed amendment. CE Recommendation: No change recommended to the Proposed Material Alteration.

Material Alteration Reference: MA3.5

Location in SURF: Table 14
Red Cow & Cherry Orchard PDA Development Guidance

Page No.(s): 144

1. Amend text of PDA Development Guidance Tables as follows:

- *Projected* Population ~~Target~~
- Residential Units *Target*
- Jobs (~~Min~~ Target)
- Employment Floorspace (~~Min~~ Target in m²)

2. Amend Note D of PDA Development Guidance Tables Development as follows:

'Employment floor space target considers larger floor plates required for urban industry uses.'

3. Amend Note E of PDA Development Guidance Tables Development as follows:

'School numbers to be determined based on demand reflecting growth and latent availability, *in consultation with the Department of Education and Youth*'.

Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-9: Dept. of Education and Youth</u>	The submission from the Department of Education and Youth, notes the amendment to Note E of Table 14: Red Cow & Cherry Orchard PDA Development Guidance tables.	CE Response: The content of the submission from the Department of Education and Youth is acknowledged. CE Recommendation: No change recommended to the Proposed Material Alteration.

Material Alteration Reference: MA3.6

Location in SURF: Table 16
Long Mile PDA Development Guidance

Page No.(s): 160

1. Amend text of PDA Development Guidance Tables as follows:
 - *Projected* Population ~~Target~~
 - Residential Units *Target*
 - Jobs (~~Min~~ Target)
 - Employment Floorspace (~~Min~~ Target in m²)
2. Amend Note D of PDA Development Guidance Tables Development as follows:

'Employment floor space target considers larger floor plates required for urban industry uses.'
3. Amend Note E of PDA Development Guidance Tables Development as follows:

'School numbers to be determined based on demand reflecting growth and latent availability, *in consultation with the Department of Education and Youth*'.

Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-11: C Duffy Properties (c/o Tom Phillips and Associates Planning consultants)</u>	The submission relates to the c.1.8ha Motokov Complex site within the Long Mile Priority Development Area (PDA) and notes that an LRD application is at an advanced stage following extensive pre-application engagement with South Dublin County Council. The respondent expresses concern that aspects of the Draft SURF, particularly residential development standards and employment floorspace requirements, could adversely affect the viability and delivery of the proposed scheme by limiting residential capacity and imposing potentially unrealistic employment targets. While seeking greater flexibility regarding residential densities, employment provision and building heights, the respondent welcomes Material Alteration MA3.6, which removes minimum residential delivery targets and introduces a more flexible approach to development guidance. Overall, the submission is broadly supportive of the Material Alterations and requests that the SURF be implemented with sufficient flexibility to accommodate site-specific circumstances and	CE Response: The submitter's support for proposed Material Alteration 3.6 which <i>inter alia</i>, introduces targets instead of minimum requirements, is acknowledged. The Material Alteration proposes to replace minimum requirements in the Development Guidance Tables for jobs and employment floorspace with targets which are less prescriptive and introduce flexibility. The changes also clarify that the residential unit number is a target and that the population is projected. The SURF establishes a firm strategic framework but builds flexibility into the development mix, density, phasing and infrastructure delivery, allowing development to respond to changing circumstances without compromising the overall regeneration vision. When the SURF is adopted (assuming the proposed Variation is made), the document will become the statutory planning guidance document for the City Edge area within the SDCC jurisdiction.

	facilitate the timely delivery of the Motokov Complex redevelopment.	As such, all planning applications will be assessed against the provisions of the SURF and flexibility will be applied as provided for in the SURF. CE Recommendation: No change recommended to Proposed Material Alteration.
<u>SD-C442-9: Dept. of Education and Youth</u>	The submission from the Department of Education and Youth, notes the amendment to Note E of Table 16: Long Mile PDA Development Guidance	CE Response: The content of the submission from the Department of Education and Youth is acknowledged. CE Recommendation: No change recommended to Proposed Material Alteration.

Material Alteration Reference: MA3.7

Location in SURF: Table 18 Greenhills PDA Development Guidance

Page No.(s): 175

1. Amend text of PDA Development Guidance Tables as follows:
 - *Projected* Population ~~Target~~
 - Residential Units *Target*
 - Jobs (~~Min~~ Target)
 - Employment Floorspace (~~Min~~ Target in m²)
2. Amend Note D of PDA Development Guidance Tables Development as follows:
'Employment floor space target considers larger floor plates required for urban industry uses.'
3. Amend Note E of PDA Development Guidance Tables Development as follows:
'School numbers to be determined based on demand reflecting growth and latent availability, in consultation with the Department of Education and Youth'.

Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-9: Dept. of Education and Youth</u>	The submission from the Department of Education and Youth, notes the amendment to Note E of Table 18: Greenhills PDA Development Guidance.	CE Response: The content of the submission from the Department of Education and Youth is acknowledged. CE Recommendation: No change recommended to Proposed Material Alteration.
<u>SD-C442-12: B & G Ltd (c/o Tom Phillips and Associates Planning consultants)</u>	The submission supports Proposed Material Alteration MA3.7 replacing minimum development requirements with broader development targets.	CE Response: The support for MA2.22 is acknowledged. CE Recommendation: No change recommended to the Proposed Material Alteration.

Material Alteration Reference: MA-SFRA1.2		
Location in SURF: Figure 5-2 of the SFRA		Page No.(s): 30
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. Refer to Section 4 below.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-8: Office of Public Works SD-C442-9: Dept. of Education and Youth Refer also to Section 2.1 above for OPR comments on proposed MA-SFRA1.2.	The submissions from the OPW and Department of Education and Youth (and OPR – refer to Section 2.1) welcome and note the proposed Material Amendment to relocate the indicative school site outside of Flood Zone B in Fig.5-2 of the SFRA.	CE Response: The Planning Authority notes the support expressed for the proposed amendment. CE Recommendation: No change recommended to Proposed Material Alteration.

Material Alteration Reference: MA-SFRA1.3		
Location in SURF: Section 7 of the SFRA		Page No.(s): 38 - 45
Replace Section 7 Justification Tests in its entirety. Refer to SFRA – Section 7 Justification Tests document.		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
<u>SD-C442-8: Office of Public Works</u> Refer also to Section 2.1 above for OPR recommendation on proposed MA-SFRA1.3.	JUSTIFICATION TESTS: The submission notes that its previous comment regarding Criterion 2(iii) of the Justification Tests has not been addressed. Criterion 2(iii) in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) (Flood Guidelines) requires demonstration that a zoning or designation is within or adjoining the core of an established or designated urban settlement. The submission advises that the response provided across all three Justification Tests, referencing the RSES South-Western Development Corridor designation and the SDCC Development Plan core strategy, is more applicable to Criterion 1 than to Criterion 2(iii) and advises that the Planning Authority is required to provide a site-specific response demonstrating that the zoning is within or	CE Response: The Planning Authority notes the matters raised by the Office of Public Works and Office of the Planning Regulator (see Section 2.1) in relation to Criterion 2(iii) of the Plan Making Justification Test, and the Camac Flood Alleviation Scheme. In relation to the Justification Test, having consulted with the SFRA consultants, the Planning Authority recommends modifying the Justification test to strengthen the criterion 2(iii) to demonstrate on a site-specific basis, that the zoning designation is within or adjoining the core of an established or designated urban settlement. In relation to the Camac Flood Alleviation Scheme, the Planning Authority confirms that development

	adjoining the core of an urban settlement in order to satisfy the criterion. The submission also notes that all Justification Tests reference the Camac Flood Alleviation Scheme (CFAS) as a mitigation measure and clarifies that the proposed defences are designed to protect existing communities and will not release lands for new development. The Planning Authority is advised to liaise with the Camac Flood Alleviation Scheme design team to correctly identify sites that may benefit from the scheme, ensure that proposed development will not impede the delivery of the CFAS, and treat new development as premature in areas where defences are proposed until those measures are in place. In relation to proposed mitigation measures, the submission advises that requiring ground floor uses compatible with Flood Zone A may not be practical or achievable and recommends that SDCC consider setting minimum ground floor levels above the 1% flood level, include an allowance for climate change and appropriate freeboard, in accordance with the Guidelines. The submission further recommends that all development in flood risk areas utilise flood resilient construction materials and fittings.	in proximity to the Camac will not impede the CFAS and that consultation with the CFAS design team will be ensured throughout the development process. Having consulted with the SFRA consultants the statement confirming the above points is included in the modified SFRA in the <i>'Proposed Modification 3'</i> section of Appendix 1 <i>'Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)'</i>. The Planning Authority would further like to confirm that The Camac Flood Alleviation Scheme design team will be represented alongside other agencies on the City Edge Infrastructure Delivery Working Group (IDWG). Similar points have been raised by the Office of the Planning Regulator and therefore refer also to the CE Responses set out in Section 2.1. In relation to the proposed mitigation measures, the Planning Authority notes the recommendation that requiring ground floor uses compatible with Flood Zone A may not be practical or achievable in all circumstances and accepts the recommendation to set minimum ground floor levels above the 1% flood level, with an appropriate allowance for climate change and freeboard, in accordance with the Flood Guidelines. The Planning Authority further accepts the recommendation that all development in flood
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		risk areas utilise flood resilient construction materials and fittings. Having consulted with the SFRA consultants the Planning Authority recommends that the relevant mitigation measures within the SFRA be updated to note the requirement to set minimum ground floor level above the expected flood level in addition to the ground floor uses to be compatible with the Flood Zone classification. The proposed modification is set out in the Section '<i>Proposed Modification 3</i>' of the appendix '<i>Proposed Modification to the SFRA</i>'. CE Recommendation: Recommendation to make modifications as follows: - to strengthen the Justification Test response to criterion 2(iii) to demonstrate on a site-specific basis, that the zoning designation is within or adjoining the core of an established or designated urban settlement. - to make a modification to address that development in proximity to the Camac Flood Alleviation Scheme (CFAS) will not impede the CFAS and to ensure continuous engagement with the CFAS design team; - and to update the relevant mitigation measures in the SFRA to include the
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		requirement of minimum ground floor levels to minimise flood risk. Refer to the Section '<i>Proposed Modification 3</i>' of Appendix 1 '<i>Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)</i>'.
<u>SD-C442-8: Office of Public Works</u> Refer also to Section 2.1 above for OPR submission on MA-SFRA1.3.	PFRA PLUVIAL MAPPING: The submission notes that Preliminary Flood Risk Assessment (PFRA)+85 pluvial flood mapping remains included in the SURF despite previous recommendations for its removal. It also notes that the CE Report has stated the mapping to be appropriate to be included alongside more recently available OPW community scale mapping sourced from Floodinfo.ie. The submission maintains that PFRA indicative flood maps have been superseded by more recently published national flood mapping and are not appropriate for assessing pluvial flood risk at a national scale. While noting that the Rainfall Flood Extents dataset for Dublin produced through the National CFRAM Programme is available, the submission advises that this dataset does not account for	CE Response: The Planning Authority notes the submission regarding the inclusion of Preliminary Flood Risk Assessment (PFRA) pluvial flood mapping within the SURF, notwithstanding previous recommendations for its removal. The Planning Authority proposes to remove the PFRA datasets and having consulted with the SFRA consultants, proposes to replace these with the 2D rain-on-grid model, run by using the 100-year rainfall to determine areas potentially at risk of pluvial flooding. This approach is additionally supported by Policy SWRM1: Surface Water/Rainwater Management, Objective 1 of the Draft SURF, which seeks to prepare a Surface Water Drainage Study for each Priority Development Area, thereby addressing the recommendation to undertake drainage assessment at a localised level as each PDA comes forward for development.

	drainage systems and is likely to overestimate pluvial flood risk. The submission recommends that PFRA data is no longer used for any purpose and that a more localised drainage assessment be undertaken if pluvial flooding is considered a concern within the plan area.	The matters raised in this submission in relation to PFRA datasets have been similarly raised by the Office of the Planning Regulator (refer to the CE Response set out in Section 2.1 where this matter is also dealt with in the context of the OPR's submission). CE Recommendation: Recommendation to make a modification by replacing the Preliminary Flood Risk Assessment (PFRA) pluvial flood mapping with more appropriate rainfall modelling (2D rain-on-grid model), with reference to Policy SWRM1 Objective 1 in the Draft SURF to address Pluvial Flood risk through a more localised drainage assessment for each PDA. Refer to the <i>'Proposed Modification 1'</i> section of Appendix 1 <i>'Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)'</i>.
SD-C442-8: Office of Public Works	FLOOD ZONES AND CLIMATE CHANGE (MAP) The submission notes that its previous comment regarding Flood Zone mapping has not been addressed. While welcoming the Planning Authority's precautionary approach in utilising the CFRAM High End Future Scenario extents to define Flood Zones A and B, the submission advises that	CE Response: The Planning Authority notes the submission regarding the Flood Zone mapping and acknowledges that this matter was raised in a previous submission and has not been addressed in the proposed Material Alterations. The Planning Authority notes that the submission welcomes the

	Flood Zones should be defined in accordance with Section 2.24 of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines)', based on present day flood extents without the inclusion of climate change factors. The submission recommends that the Flood Zone mapping be updated to present day extents, with climate change mapping included separately. The submission notes that as present-day flood extents have already been used to prepare the Justification Test submitted with the Material Alterations, only the mapping would require updating.	precautionary approach taken in utilising the CFRAM High End Future Scenario extents to define Flood Zones A and B, The Planning Authority accepts the recommendation that Flood Zones should be defined in accordance with Section 2.24 of 'the Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009), based on present day flood extents without the inclusion of climate change factors, with climate change mapping included as a separate layer. The Planning Authority notes that as present-day flood extents have already been used to prepare the Justification Tests submitted with the Material Alterations, only the Flood Zone mapping would require updating Having consulted with the SFRA consultants, the Planning Authority recommends making a modification to update the Flood Zone mapping to present day extents, with the High-End Future Scenario (HEFS) mapping included as a separate layer. The proposed modification is set out in the Section '<i>Proposed Modification 2</i>' of Appendix 1 '<i>Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)</i>'.
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		CE Recommendation: Recommendation to make a modification to update the Flood Zone mapping to present day extents, with the High-End Future Scenario (HEFS) mapping included as a separate layer. Refer to the Section '<i>Proposed Modification 2</i>' of Appendix 1 '<i>Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)</i>'.
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Section 4: Issues Raised which are Out of Scope

A number of submissions raised issues that are outside the scope of the public consultation on the proposed Material Alterations. As stated in the notice on the Consultation Portal and in the Report on the Proposed Material Alterations:

‘Only submissions or observations made in respect of the proposed Material Alterations and accompanying documents will be taken into consideration before the making of any Material Alteration to Variation No. 3 to the South Dublin County Development Plan 2022-2028. Submissions or observations in relation to other aspects of Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028 cannot be considered at this stage.’

The issues raised that are outside the scope of the public consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and Development Act 2024 are set out below.

Out of Scope		
Submission URN and Author	Submission Summary	Chief Executive Response and Recommendation
SD-C442-1: Azlina Abd Rahman	This submission relates to Finnstown Castle and its surrounding landscape and is seeking the protection of its green landscape.	CE Response: Finnstown Castle and its surrounding landscape are not included in the City Edge Draft Strategic Urban Regeneration Framework (SURF) area. As a result, this submission is considered to be outside the scope of this consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and Development Act 2024.

<u>SD-C442-2: TII</u>	This submission notes that the M50 and M7 are identified as part of the Trans-European Transport Network (TEN-T) Core Network. This submission acknowledges that the national road network is protected in the County Plan and notes that the statements in the CE Report which cites duplication of national, regional and local objectives is considered inappropriate. The submitter states that this statement appears to run counter to the numerous “duplications” of similar policies which are included in the City Edge Variation. This submitter is concerned with the lack of an acknowledgement in Section 2.5 ‘Movement’ of the Draft City Edge Strategic Urban Regeneration Framework of the need to maintain the operation and safety of the M/N7 and M50 and 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. The TII notes that 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 of the	CE Response: It is noted that this submission does not relate to any specific Material Alteration and is therefore considered to be outside the scope of this consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and Development Act 2024. Notwithstanding this, the CE wishes to reiterate that 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). Attention is drawn to 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>”
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	most strategic locations on the national road network The submitter 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 M/N7 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.	This objective is considered sufficient to address the concerns of Transportation Infrastructure Ireland.
<u>SD-C442-3:</u> <u>Proinsias Mac</u> <u>Ehlannchadha</u>	Supportive of the goals and vision of the City Edge Project. Delivery timelines should be brought forward significantly. CEO responses on the feedback submitted as part of the initial public consultation were inadequate in identifying playing facilities. These cannot be accommodated in linear parks as intimated in the responses and should be incorporated as part of proper planning for this area as was the case in SDZ areas. Dedicated playing pitch zoning is essential to avoid future shortages of outdoor sports facilities. For	CE Response: It is noted that this submission does not relate to any Proposed Material Alteration contained within the Material Alterations Report and is therefore considered to be outside the scope of this consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and Development Act 2024. The CE notes that the draft SURF does not seek to rezone land within City Edge. The CE wishes to reiterate that sports hubs are provided for in Section 2.13.1 of the draft SURF, and will accommodate a wide range of active recreation facilities. Major

	maximum use, these should be situated close to schools and public transport mobility hubs. The submission requests: • Specific zoning for playing pitches aside from those which are included in linear parks • Set a minimum number of pitches proportionate to population growth • Ensure provision of Children's play areas, Youth and adult recreation spaces, Multi-use open spaces suitable for organised sport for all ages (indoors and outdoors and all weather).	parks will also provide for active recreation alongside other functions such as passive recreation, space for nature and sustainable drainage. (A feasibility study for the first major park will be undertaken as provided for in Section 2.12.3 of the SURF). Provision of sports hubs and major parks are linked to development of the PDAs within the SURF's Implementation and Phasing Section.
SD-C442-4: MARA	The submission from the Maritime Area Regulatory Authority (MARA) confirmed that it has no additional comments to make beyond those contained in its previous submission dated 22nd April 2026 (during the initial round of public consultation on the Draft SURF). MARA reminded the Planning Authority of its obligation under Section 58(18)(c) of the Planning and Development Act 2024 to provide a copy of the adopted variation within one week of its adoption.	CE Response: The contents of this submission are duly noted.

<u>SD-C442-5: Irish Water</u>	The submission from Uisce Éireann raises no objection to the Proposed Material Alterations to Variation No. 3 and has no further comments or observations to make at this time. The submission notes that continued collaboration between SDCC, developers and Uisce Éireann will be essential to ensure water services infrastructure is planned, funded and delivered in tandem with future growth and development in the City Edge area.	CE Response: The contents of this submission are duly noted.
<u>SD-C442-7: EPA</u>	The submission from the Environmental Protection Agency (EPA) acknowledges the Proposed Material Alterations and notes the proposed SEA determination. The submission advises that SDCC should ensure the Variation, as amended, is consistent with the requirements of proper planning and sustainable development, with adequate critical service infrastructure in place or required to be provided to service development during the lifetime of the Variation. The submission recommends that the Variation aligns with national commitments on climate change mitigation and adaptation and is consistent with relevant higher-level plans and programmes.	CE Response: The contents of this submission are duly noted. The CE wishes to reiterate that 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 of the SURF) and SDCC remains committed to safeguarding the environment in line with national commitments. All proposed Material Alterations and all proposed modifications have been screened for both SEA and AA.

	The submission advises that any further changes to the draft Variation should be screened for likely significant effects in accordance with the SEA Regulations and upon its adoption, SDCC is required to prepare an SEA Statement setting out how environmental considerations have been integrated, how submissions and consultations were taken into account, the reasons for the chosen approach in light of reasonable alternatives, and the measures to monitor significant environmental effects. The submission directs SDCC to its guidance document <i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i> and notes that its role as SEA environmental authority is advisory and does not extend to approving or enforcing SEAs or plans.	
<u>SD-C442-10: ESB</u>	The submission is broadly supportive of the City Edge regeneration vision and the Draft SURF. ESB's primary concern is to ensure that future development proposals are compatible with the operational requirements of the national electricity network. The submission supports the continuation of the undergrounding overhead lines feasibility study but emphasises that any future decision should be based on robust engineering, environmental, operational, and economic	CE Response: The contents of this submission are duly noted. However, it is noted that this submission does not relate to any specific Material Alteration contained within the Material Alterations Report and is therefore considered to be outside the scope of this consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and

	assessments, while maintaining the safety, security, and resilience of critical electricity infrastructure.	Development Act 2024. Notwithstanding this, SDCC will continue its regular engagement with ESB and all relevant stakeholders through the City Edge Steering Group, the City Edge Infrastructure Delivery Working Group and other relevant fora, as part of the implementation of the draft SURF (when adopted) and as part of the forthcoming review of the South Dublin County Development Plan.
<u>SD-C442-12: B & G Ltd (c/o Tom Phillips and Associates Planning consultants)</u>	The submission cites the need for greater flexibility in car parking standards for larger convenience retail uses. Overall, the respondent supports the amended SURF framework and seeks assurance that the flexibility introduced through the Material Alterations will be applied in practice during the assessment of planning applications within the Greenhills PDA.	The issue raised in the submission is acknowledged. However, it is noted that this issue does not relate to any Proposed Material Alteration contained within the Material Alterations Report and is therefore considered to be outside the scope of this consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and Development Act 2024.
<u>URN: SD-C442-14 Office of the Planning Regulator</u>	In relation to Observation 2(iii) (in the OPR's initial submission), the Office notes that no amendments have been made to address the need to maintain the operation and safety of the M50 and N7 and to protect the strategic road network within the City Edge SURF. Transport Infrastructure Ireland (TII) has also raised concerns regarding this matter.	CE Response: The further observation of the OPR is acknowledged. However, it is noted that this submission does not relate to any specific Material Alteration contained within the Material Alterations Report and is therefore considered to be outside

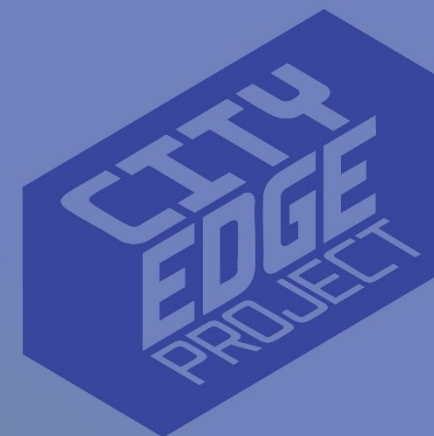
	Accordingly, the Office advises that these issues should be addressed through early engagement with the relevant stakeholders as part of the forthcoming review of the South Dublin Development Plan.	the scope of this consultation having regard to Section 58(13)(f)(ii) and Section 58(15)(c) of the Planning and Development Act 2024. As advised by the OPR, SDCC will continue its regular engagement with TII and all relevant stakeholders through the City Edge Steering Group, the City Edge Infrastructure Delivery Working Group and other relevant fora, as part of the implementation of the draft SURF (when adopted) and as part of the forthcoming review of the South Dublin County Development Plan. CE Recommendation: No changes recommended to proposed Material Alterations.
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Appendix 1: Proposed Minor Modifications to the Strategic Flood Risk Assessment (SFRA)

South Dublin County Development Plan 2022-2028

Proposed Variation No 3

City Edge Strategic Urban Regeneration Framework 2026



Appendix 1:

Proposed Minor Modifications to the
Strategic Flood Risk Assessment
(SFRA)

October 2026



Proposed Modification 1

PFRA Pluvial Mapping

3.2.6 Pluvial Flood Mapping (OPW and SDCC)

~~The pluvial flooding map from the OPW run website Floodinfo.ie which was used in the Surface Water Management Plan of the City Edge Framework (2022) is shown in Figure 3-10 below.~~

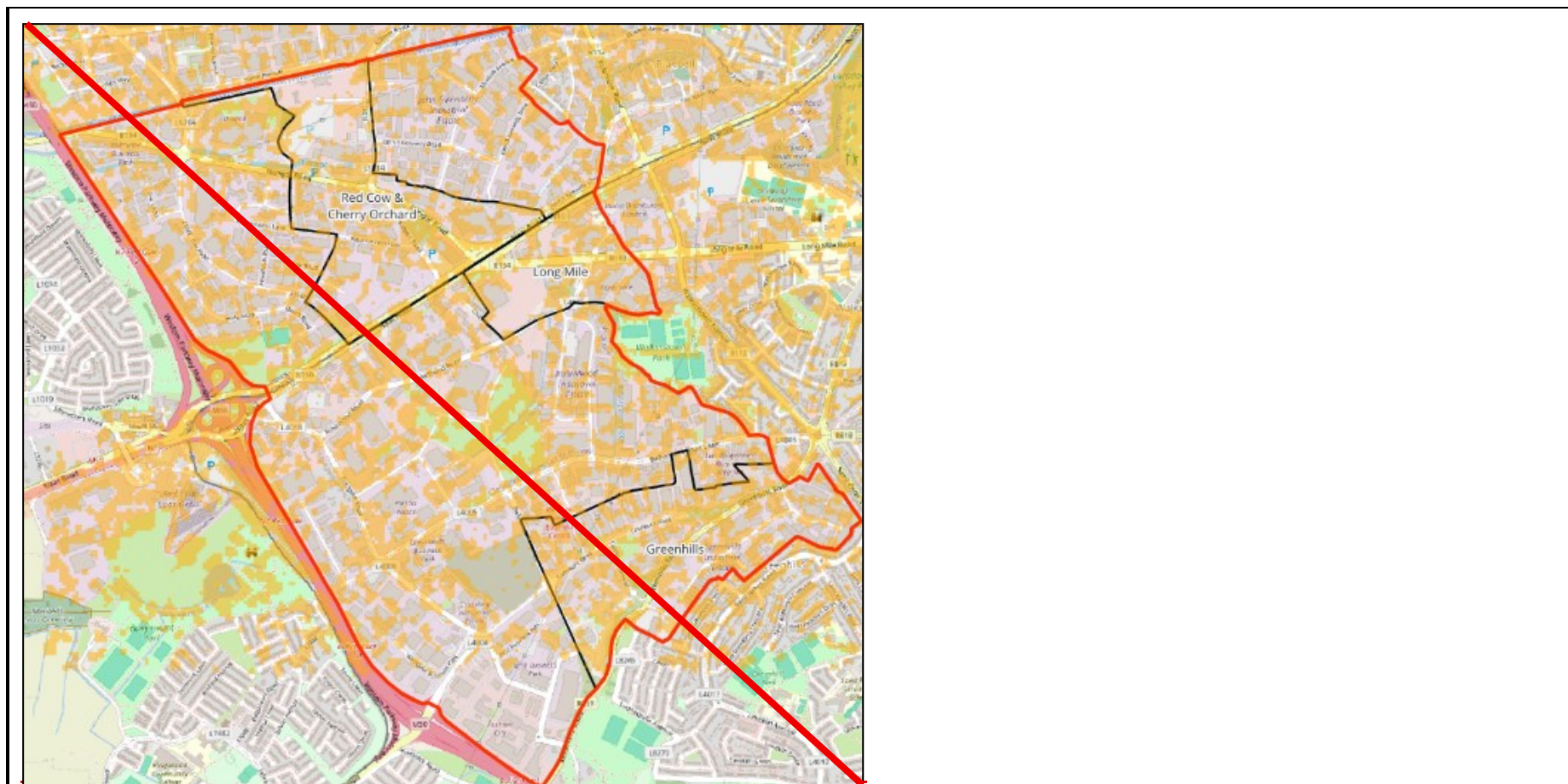


Figure 3-10: OPW Pluvial Flood Map (source: Floodinfo.ie)

In addition The SDCC development plan SFRA includes pluvial flood maps for the county. The extract from that map is shown A strategic level 2D rain-on-grid model has been run using the 100-year rainfall to determine areas

potentially at risk of pluvial flooding. This model does not include drainage systems but assumes a uniform 14mm per hour is removed by the drainage system. The model gives the at-risk areas shown in Figure 3.11.

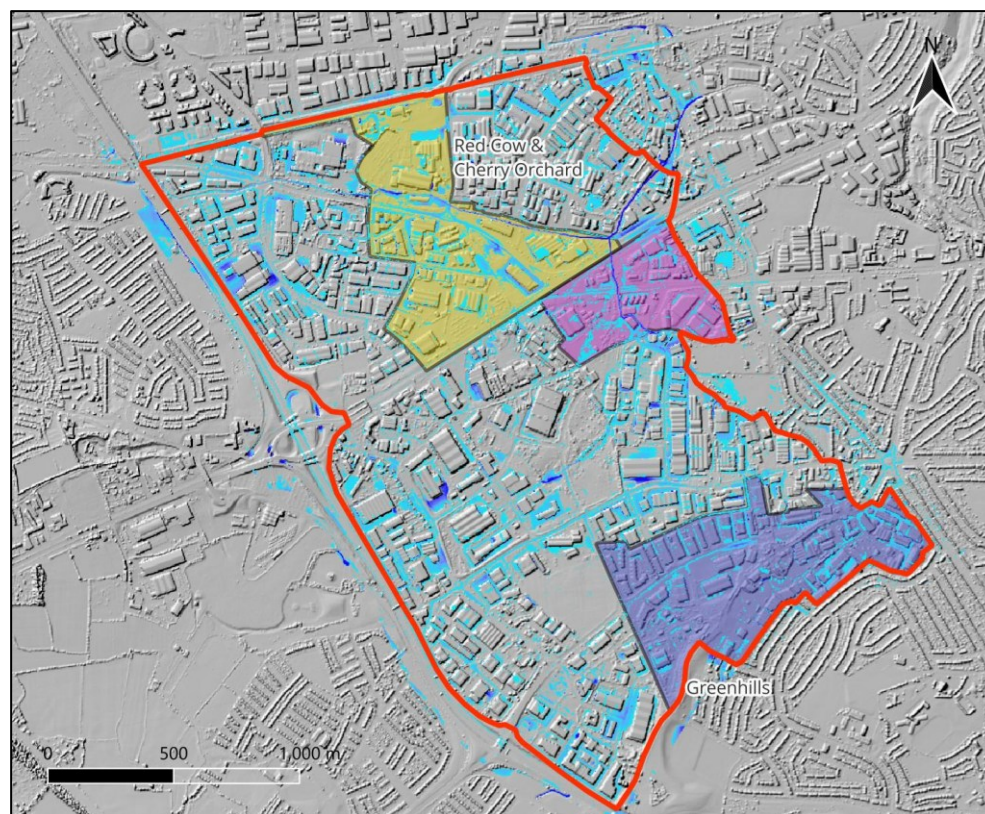


Figure 3-11: 2D Model Generated Pluvial Flood Map

The pluvial flood mapping generally indicates areas of depressions which may fill if drainage outlets reach capacity or become blocked. *The flooding areas indicated are predominantly associated with existing road corridors which tend to accumulate water.* Proper drainage design in accordance with the SuDS principles of the SURF, the City Edge Strategic Framework Surface Water Management Plan (2022) and the SDCC Development plan will mitigate this risk.

The City Edge SURF includes the below policy and objectives relating to surface water management. SWRM1 Objective 2 requires the preparation of a Surface Water / Rainwater Management Plan at Priority Development Area or Neighbourhood level.

Table 3-2: Policy SWRM1: Surface Water/Rainwater Management from the City Edge SURF

Policy SWRM1: Surface Water /Rainwater Management
Reduce surface water run-off by delivering a high quality, coordinated Sustainable Urban Drainage System (SuDS) integrated with the public realm and public open space within the Priority Development Areas and across City Edge.
SWRM1 Objective 1:
To prepare a Surface Water Drainage Study for each Priority Development Area.
SWRM1 Objective 2:
To require the preparation of a Surface Water / Rainwater Management Plan, at Priority Development Area or Neighbourhood level at planning application stage.

	SWRM1 Objective 3: To incorporate natural infrastructure and SuDS as part of all new development within City Edge, in accordance with the agreed Surface Water / Rainwater Management Plan, in compliance with the approaches contained in the documents Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, (SDCC, 2022) and Rainwater Management Plans – Guidance for Local Authorities (DHLGH, 2024).	
	SWRM1 Objective 4: To ensure effective operation and maintenance of SuDS measures, so that such systems are operating to their designed capacity.	
	SWRM1 Objective 5: To account for climate change, and any changes to the amount of impermeable areas over the design life of the development, in accordance with the GDSDS (and any future updates to this Study).	
	SWRM1 Objective 6: To continue to engage with Uisce Éireann with a view to agreeing a programme of local surface water interventions to free up foul water capacity.	

3.2 Flood Risk Identification Summary

The City Edge area is likely to be impacted by fluvial flooding from the River Camac and its tributary watercourses. The likely extent of the flood zone is shown in the flood zone mapping. The mapping is the best available at the current time but will be superseded by the Camac FAS mapping once the baseline dataset becomes available. The pluvial flood risk mapping shows *some extensive* areas potentially at risk, however this mapping is an identification of topographic depressions rather than a representation of the flood risk since it does not consider the underlying surface water drainage network. The initial surface water drainage assessment for the City Edge area has been undertaken in the City Edge Strategic Framework Surface Water Management Plan (2022) which should be used to guide the development of surface water drainage solutions. Additional assessment of any residual pluvial risk should be undertaken as part of the surface water / rainwater management plans which are required under SWRM1 Objective 2.

Other residual risk arises from potential breach or overtopping of the Grand Canal, or from foul sewer overflows or surcharging, and from bursts on the trunk water main network. The risk of these occurring at the scale required to cause significant flooding is considered low so they are not considered further in this SFRA.

Proposed Modification 2

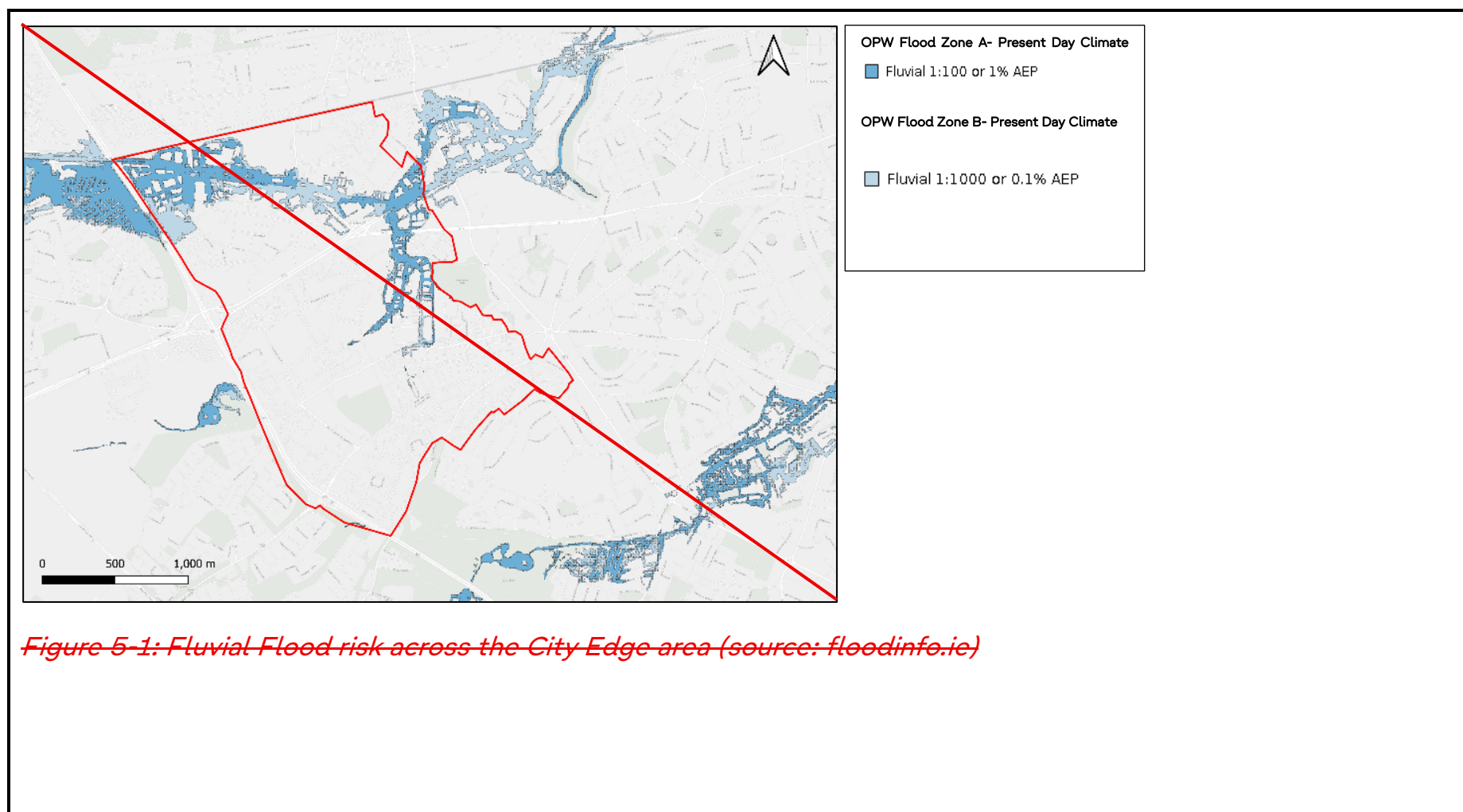
Flood Zone and Climate Change Maps

5.2 Identification of Key Areas of Fluvial Flooding

The SDCC 2022-2028 identifies areas of Flood Zone A (at risk in a 1% AEP event) and Flood Zone B (at risk in a 0.1% event) throughout the County. The information used to develop those maps was gathered from a number of sources. In the *SDCC Development Plan Camac catchment* the area identified as Flood Zone A and B was taken from the *Catchment Flood Risk Assessment and Management (CFRAM)* fluvial mapping of the High-End Future climate change Scenario (HEFS). This differs from normal OPW practice which considers Flood Zones A and B based on the present-day climate scenario.

Following submissions from the OPW and in order to remain consistent with ~~the overall County Development Plan~~ *OPW practice*, Flood Zone A and B are considered in this SFRA to be based on the ~~HEFS~~ *current climate scenario events*.

The key areas identified of fluvial flood risk from the CFRAM assessments are highlighted below in Figure5-1. The interaction between these flood risk areas and the Priority Development Areas is considered in more detail in the following sections.



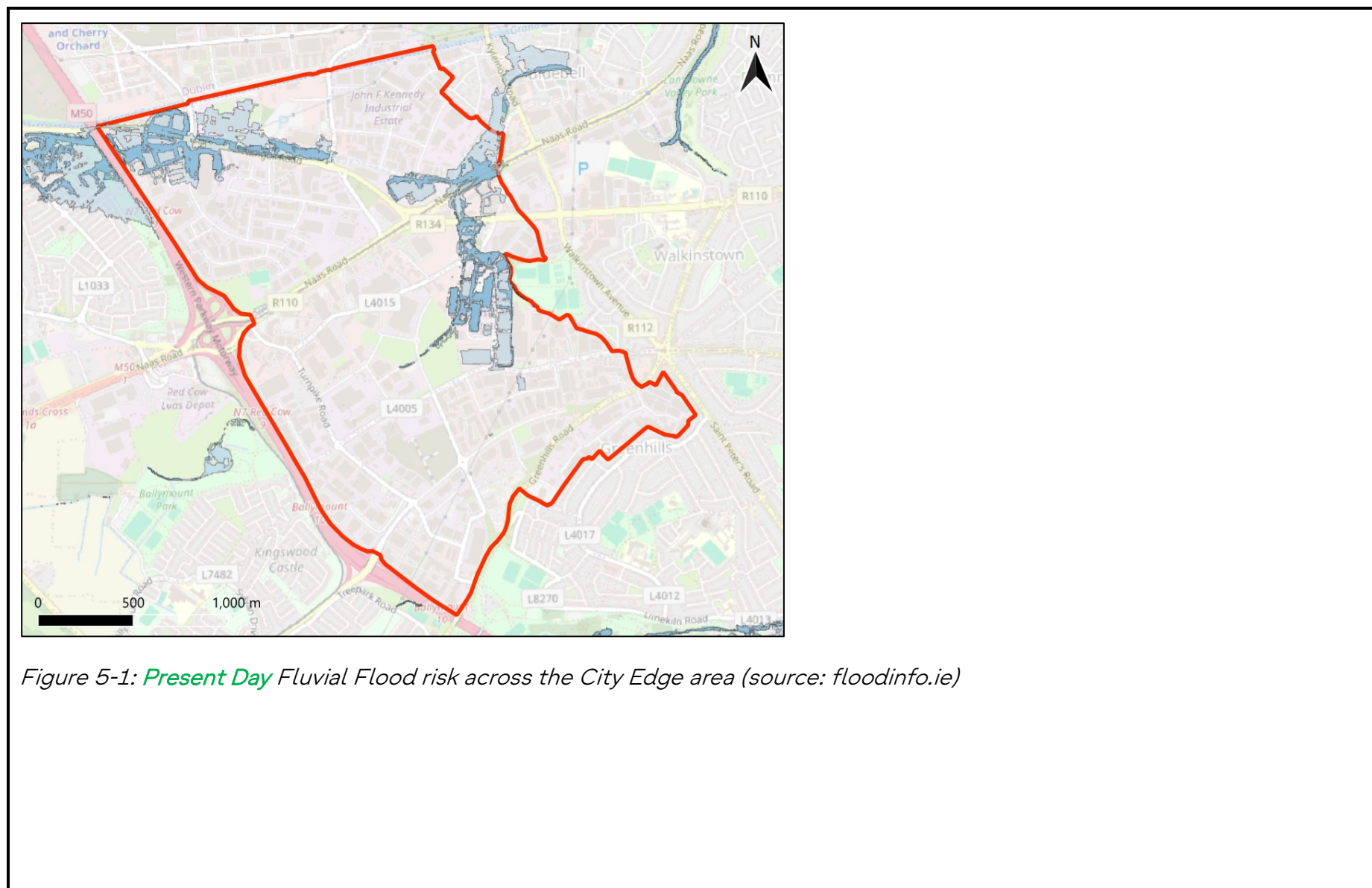


Figure 5-1: *Present Day* Fluvial Flood risk across the City Edge area (source: floodinfo.ie)

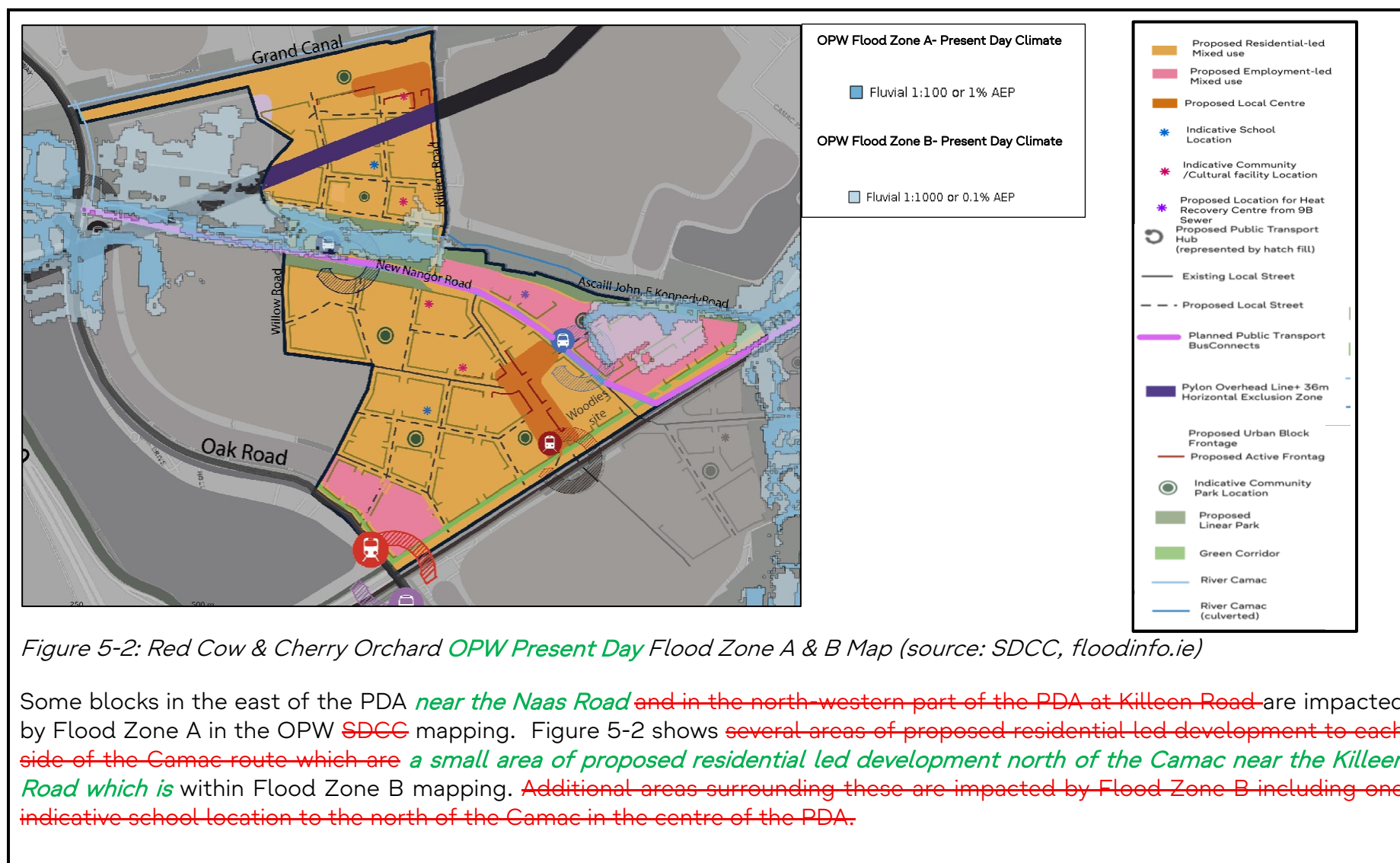
5.2.1 Red Cow and Cherry Orchard PDA

The River Camac bisects the Red Cow & Cherry Orchard PDA. The PDA is bordered by the Grand Canal to the north and by the Naas Road to the south. Although the Camac is open where it enters the PDA at the Diageo site it is crossed by multiple culverted entrances upstream and it enters a long culvert as it passes through the PDA. Through the PDA the river mainly follows the line of New Nangor Road. *The PDA zoning provides for a new riparian corridor in the form of a linear park along the Camac replacing the existing light industrial use in that area.*

A storm (surface) water drainage network discharges to the River Camac. The area is heavily developed for mainly light industrial units. The PDA does not benefit from any existing formal flood defences. The Camac Flood ~~Relief~~ *Alleviation* Scheme project is ongoing in this area but flood mapping from the scheme is not yet available at the time of this report.

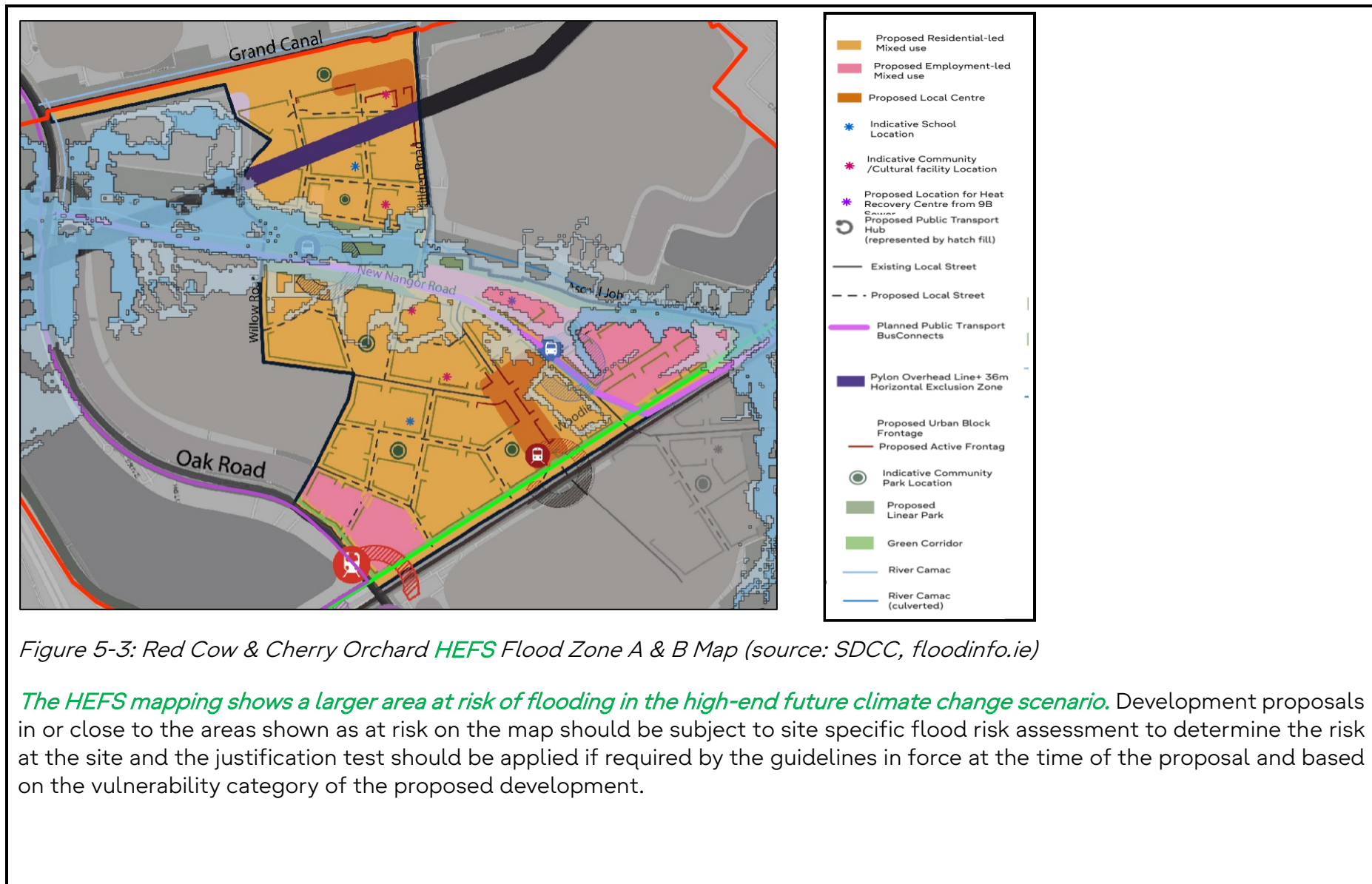
The SDCC Development Plan 2022-2028 has zoned this area as REGEN - To facilitate enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. ~~The zoning is compatible with the~~ *The proposed PDA layout and uses are compatible with the Development Plan zoning.*

The OPW flood zone map for this PDA is shown in Figure 5-2. This is the map used to determine flood risk for this SFRA.



It should be noted that a 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. Residential Led Mixed Use, Employment Led Mixed Use etc. The land uses within the Priority Development Areas are identified for mixed use *and* not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels. *In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone classification. The finished ground floor levels and evacuation route levels will be raised above the expected flood level to minimise risk.*

For reference, the SDCC Development Plan 2022-2028 flood zone maps (for the HEFS climate change scenario) are shown in *Figure 5-3*.



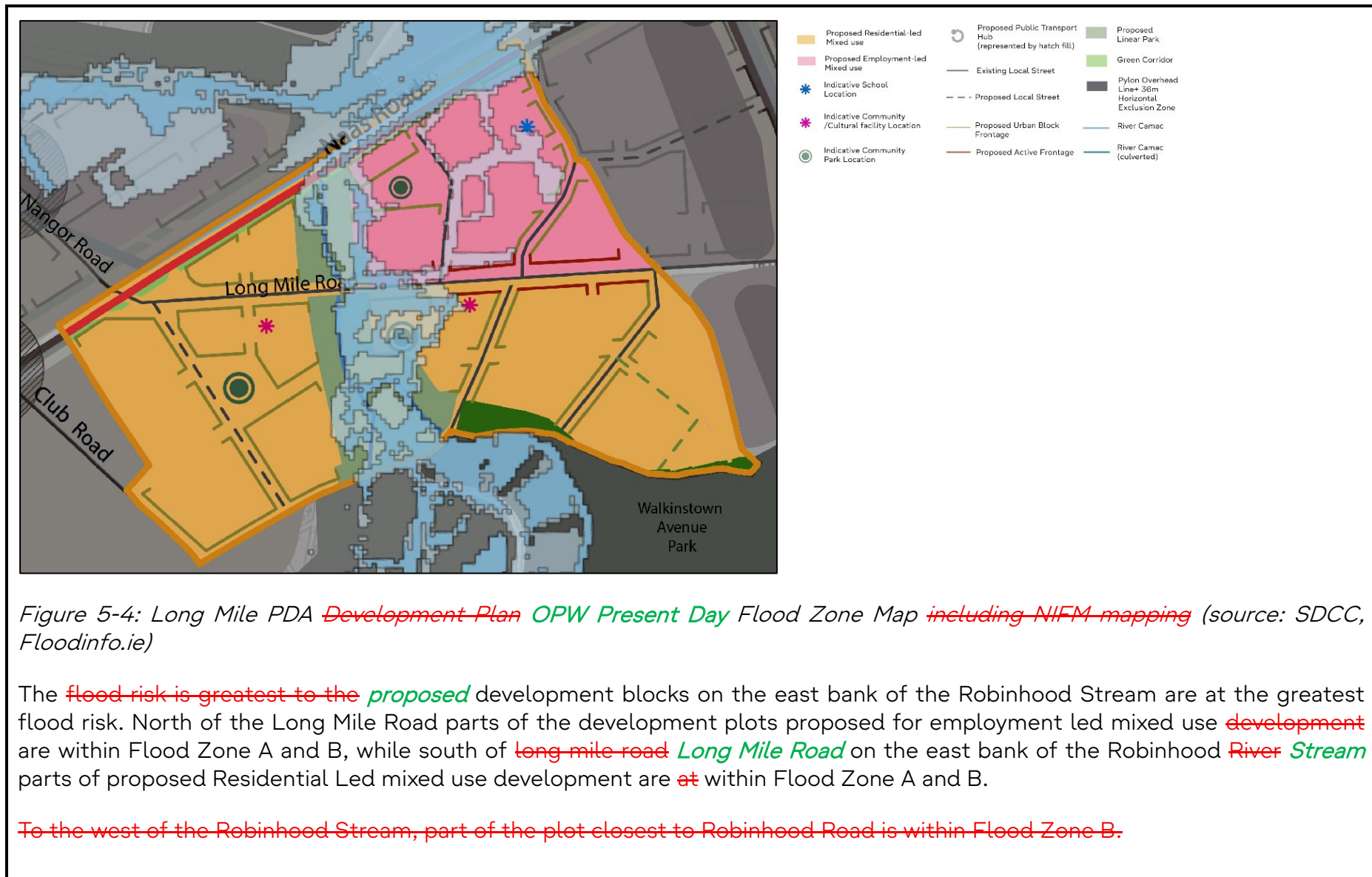
5.2.2 Long Mile PDA

The Ballymount Stream joins the Robinhood Stream just as it enters the Long Mile PDA from the south. The Robinhood Stream is generally open through the PDA although it passes through culverts at the Robinhood Road crossing and the Long Mile Road crossing, as well as at a small crossing within a property. As the stream exits the north of the PDA it enters a culvert below the Naas Road from where it joins the culverted section of the Camac River. The PDA is bordered by the Naas Road to the north and by the Robinhood Road and Walkinstown Avenue Park to the south. The PDA is bisected by the Long Mile Road which runs in an East-West direction through the PDA.

An extensive storm (surface) water drainage network discharges to the River Camac. The area is heavily developed consisting of mainly light industrial units with extensive surface parking. The PDA does not benefit from any existing formal flood defences. The Camac Flood ~~Relief~~ *Alleviation* Scheme project is ongoing in this area but flood mapping from the scheme is not yet available at the time of this report.

The SDCC development plan 2022-2028 has zoned this area as REGEN - To facilitate employment and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. ~~The zoning is compatible with the proposed PDA structure.~~ *The proposed PDA layout and uses are compatible with the Development Plan zoning. The PDA zoning provides for a new riparian corridor in the form of a linear park along the Robinhood Stream replacing the existing light industrial use in that area.*

The OPW flood zone map for this PDA is shown in Figure 5-4. This is the map used to determine flood risk for this SFRA



As with the Red Cow & Cherry Orchard PDA it should be noted that a 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. Residential Led Mixed Use, Employment Led Mixed Use etc. The land uses within the Priority Development Areas are identified for mixed use *and* not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels. *In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone classification. The finished ground floor levels and evacuation route levels will be raised above the expected flood level to minimise risk.*

The blocks bordering the west side of the stream are all partially within the area identified as at risk of flooding in the NIFM (*National Indicative Fluvial Mapping*). While this does not give a definite indication of flood risk these areas should be subject to site specific investigations at the development stage.

For reference, the SDCC Development Plan 2022-2028 flood zone maps (for the HEFS climate change scenario) are shown in Figure 5-5. The figure also includes the area shown on the National Indicative Fluvial Mapping (NIFM) as at risk in a 1% AEP present day event. The NIFM mapping is generally considered to be a less accurate source than CFRAM and is useful for identifying lands which should be subject to site specific investigations rather than definitively identifying the presence of a flood risk.

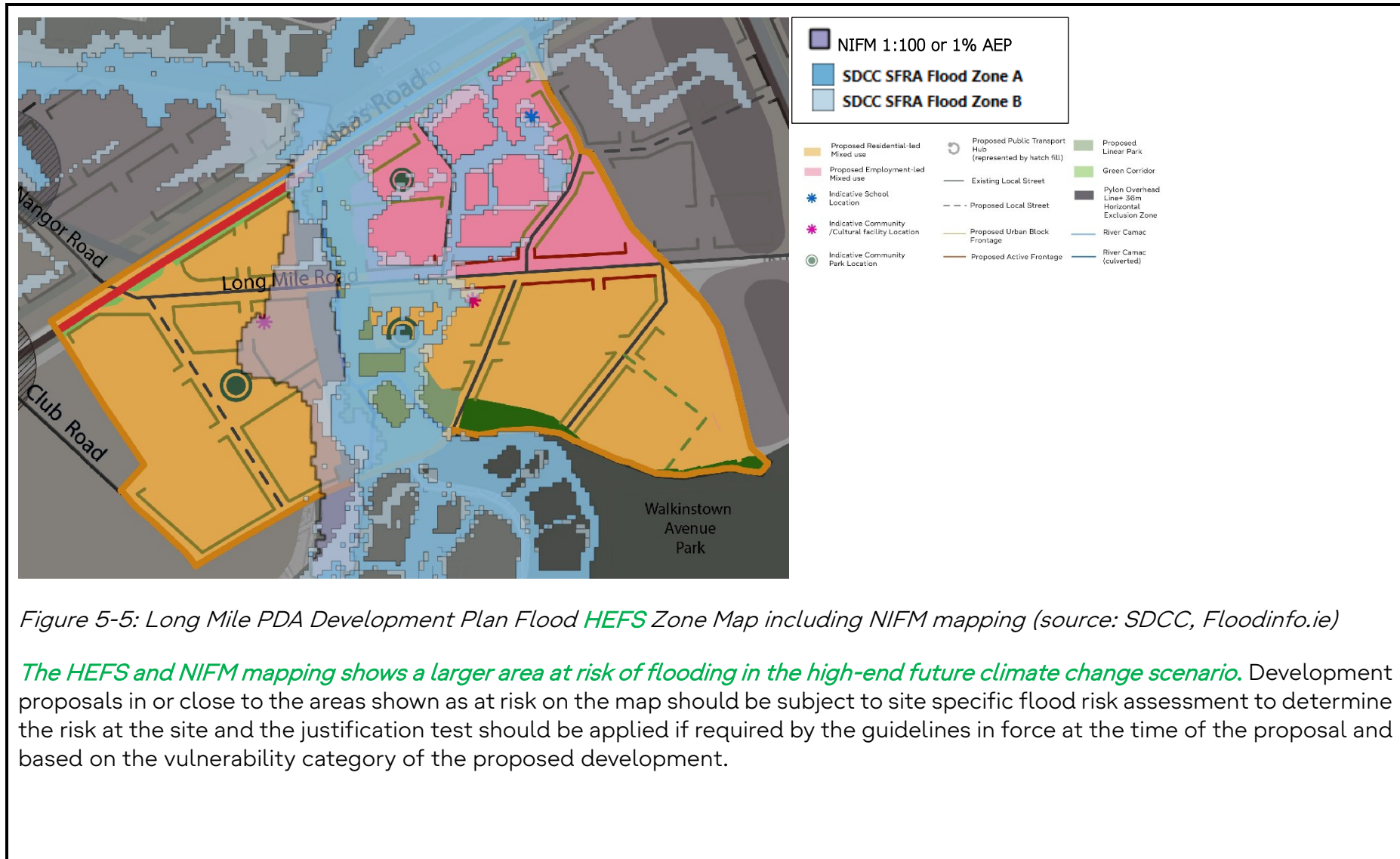


Figure 5-5: Long Mile PDA Development Plan Flood **HEFS** Zone Map including NIFM mapping (source: SDCC, Floodinfo.ie)

The HEFS and NIFM mapping shows a larger area at risk of flooding in the high-end future climate change scenario. Development proposals in or close to the areas shown as at risk on the map should be subject to site specific flood risk assessment to determine the risk at the site and the justification test should be applied if required by the guidelines in force at the time of the proposal and based on the vulnerability category of the proposed development.

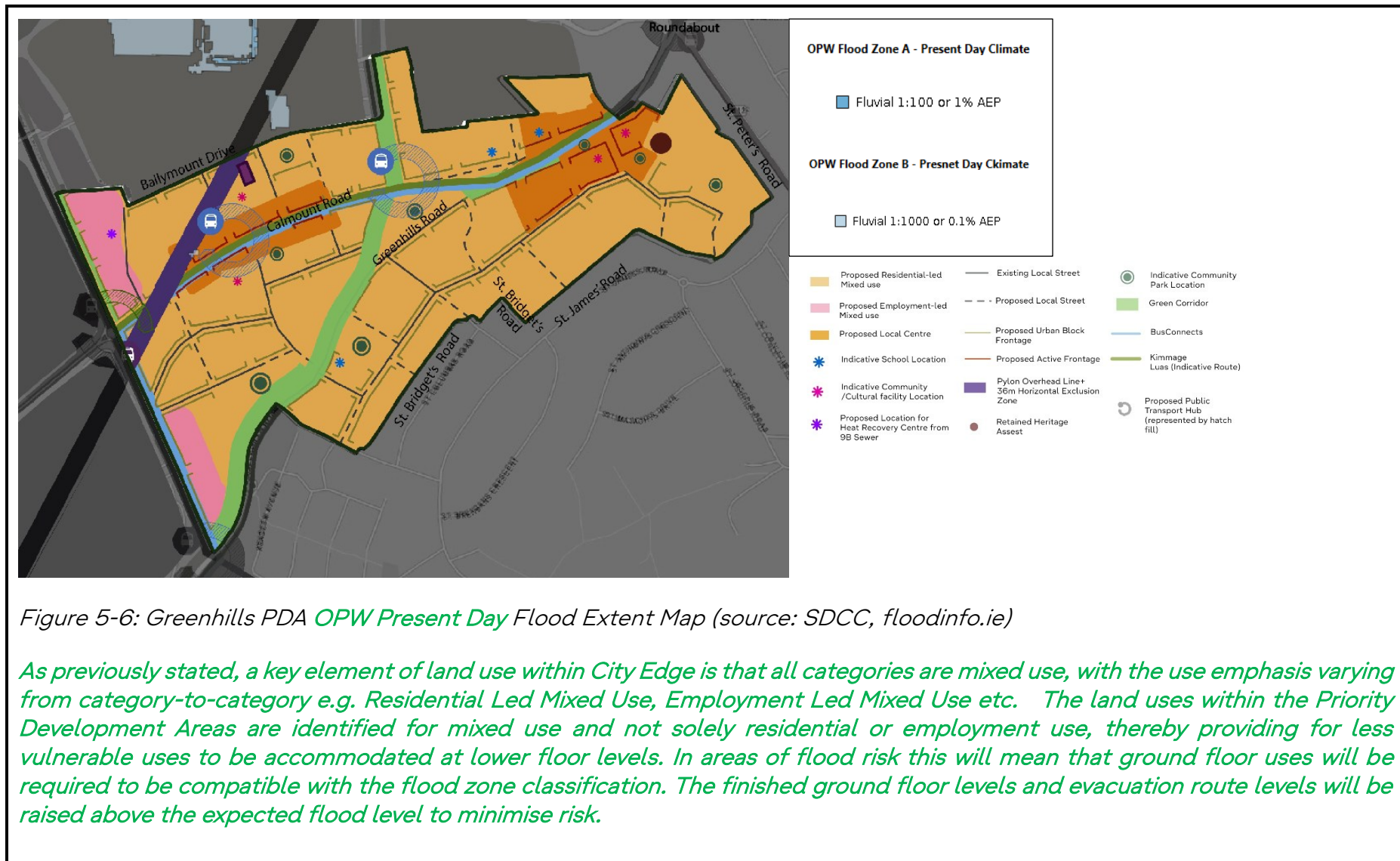
5.2.3 Greenhills PDA

There are no streams or rivers within the Greenhills PDA. The PDA is bordered by the Naas Road to the north and by the Robinhood Road and Walkinstown Avenue Park to the south.

The area north of the Greenhills Road is served by surface water networks which discharge to the Ballymount and Robinhood Streams. South of the Greenhills Road the surface water network discharges to a piped network which ultimately discharges in Landsdowne Valley Park. The area is heavily developed consisting of mainly light industrial units. The PDA does not benefit from any existing formal flood defences. The Camac Flood ~~Relief~~ *Alleviation* Scheme project is ongoing in this area but flood mapping from the scheme is not yet available at the time of this report.

The SDCC Development Plan 2022-2028 has zoned this area as REGEN - 'To facilitate enterprise and / or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery'. ~~The zoning is compatible with the~~ The proposed PDA layout and structure is compatible with the Development Plan zoning.

The OPW flood zone map for this PDA is shown in Figure 5-6. This is the map used to determine flood risk for this SFRA.



For reference, the SDCC Development Plan 2022-2028 flood extent maps (for the HEFS climate change scenario) are shown in Figure 5-7. The NIFM shows no areas of flood risk within the PDA.

By comparison of the mapping it is seen that the current day and HEFS flooded areas do not match. The present-day flood maps show some areas in Flood Zone B which are not shown as flooding in the HEFS scenario. This is due to updates applied to the present-day flood mapping which have not carried through to the HEFS mapping.

The Development Plan *HEFS* flood maps show a small area ~~of Residential led mixed-use development at~~ *just outside* the north-west corner of the PDA in the vicinity of Ballymount Drive *which* is partly within *HEFS* Flood Zone B. *There are no areas within the PDA which are at flood risk.*

Development proposals in or close to the areas shown as at risk on the maps *s* should be subject to site specific flood risk assessment to determine the risk at the site and the justification test should be applied if required by the guidelines in force at the time of the proposal and based on the vulnerability category of the proposed development.

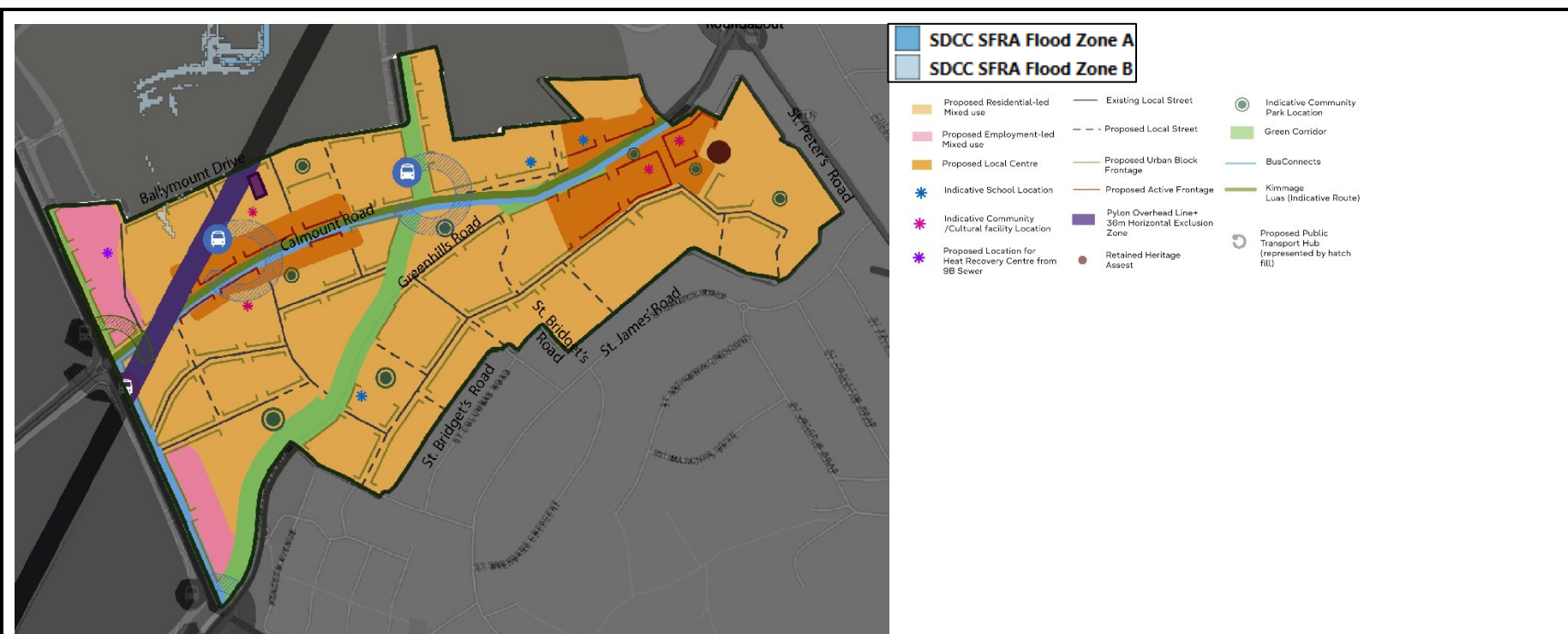


Figure 5-7: Greenhills PDA HEFS Flood Extent Map (source: SDCC, floodinfo.ie)

5.3 Conclusion

The flood risk identification has demonstrated that there are some areas at risk in ~~SDCC~~ OPW Flood Zone A and B in the *Red Cow & Cherry Orchard PDA and the Long Mile PDA*.

The land uses impacted include proposed residential-led mixed use and employment-led mixed use. The vulnerability category of the residential-led mixed use type can be highly vulnerable or less vulnerable depending on the ground floor use. The vulnerability category for the employment-led mixed-use type is likely to be less vulnerable.

Both of these vulnerability categories would require a justification test for development in Flood Zone A, and the highly vulnerable category requires a justification test for development in Flood Zone B.

The OPW currently recommends the use of the current climate scenario flood zones rather than the high-end future scenario flood zones in the SDCC Development Plan to determine if a justification test is required. Based on the current climate scenario flood zones the areas requiring justification tests ~~based on the current climate scenario flood zones~~ are identified in Section 7 of this document.

In line with government policy as demonstrated in “The Planning System and Flood Risk Management – Guidelines for Local Authorities” (DEHLG 2009) a justification test has been prepared based on the land use plan for ~~these development plan proposals~~ *the PDAs within the Draft SURF. The Justification Tests are* carried out Section O of this report.

During detailed development planning as the building lines and building typologies are determined a more detailed FRA and justification test for these areas will be required.

Where a site-specific FRA determines that highly vulnerable development is proposed for Flood Zone A nothing in this SFRA shall be taken as permitting such development. In such a case the sequential approach should be taken to avoid or mitigate the risk.

Proposed Modification 3

Justification Tests

7 Justification Tests

7.1 Overview

The SURF review in Section 5 determined that there are areas within the PDAs where highly vulnerable and less vulnerable land uses are proposed within both Flood Zones A and B.

Where potentially vulnerable development is proposed in a flood zone a justification test is required. The determination of the flood zones for this purpose is based on the current day climate scenario flood zone extents rather than the high-end future scenario flood zones used in the CDP. The questions for the justification test for development plans are given in Box 4.1 of 'The Planning System and Flood Risk Management – Guidelines for Local Authorities (2009)' and are reproduced in Figure 7-1 below.

Box 4.1: Justification Test for development plans

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan¹, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2, all of the following criteria must be satisfied:

- 1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement²;
 - (ii) Comprises significant previously developed and/or under-utilised lands;
 - (iii) Is within or adjoining the core³ of an established or designated urban settlement;
 - (iv) Will be essential in achieving compact and sustainable urban growth; and
 - (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
- 3 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 development plan preparation 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.

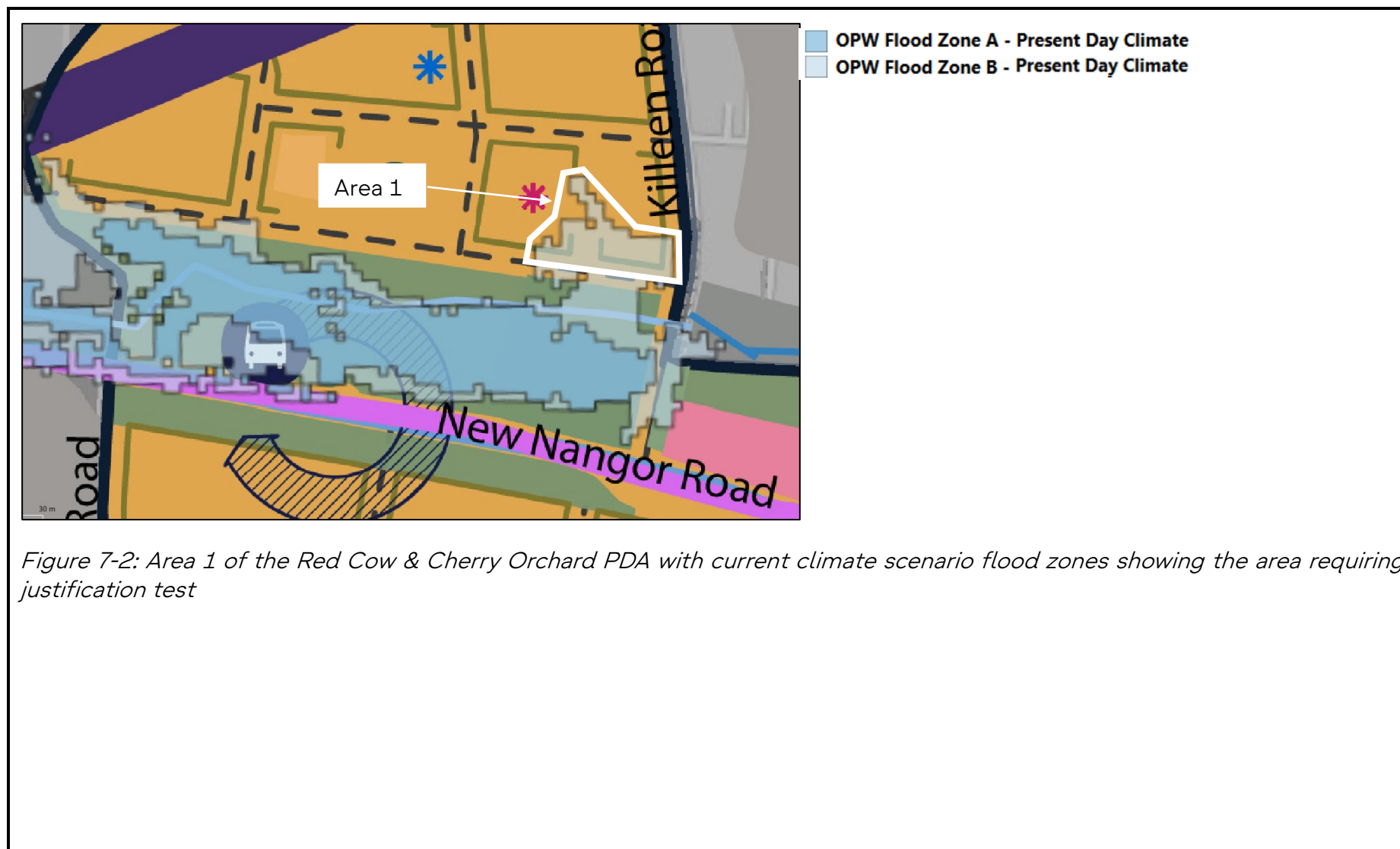
N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.

Figure 7-1: Justification test for Development plans (source: DEHLG 2009)

7.2 Red Cow and Cherry Orchard PDA Justification Test – Area 1

The SDCC development plan 2022-2028 has zoned this part of the Red Cow and Cherry Orchard PDA for enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. The SURF further identifies this area for residential-led mixed use. 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. Residential Led Mixed Use, Employment led Mixed Use etc. The proposed PDA uses and layouts are compatible with the Development Plan zoning.

The development proposed in Flood Zone A along the Camac *will be a change from the existing light industrial/logistics use to a linear park* which is water compatible development and is appropriate in Flood Zone A. The development proposed in Flood Zone B includes roads, and parkland which are water compatible, but also residential led mixed use development which can be highly vulnerable. Area 1 for the justification test ~~is~~ *consists of* a residential led mixed use designation in Flood Zone B ~~is~~ shown in Figure 7-2. *The justification test for this area is below.*



JUSTIFICATION TEST FOR DEVELOPMENT PLANS	
1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028). As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area [City Edge] has significant brownfield lands in the South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses. The SDCC Development Plan 2022-2028 identifies the City Edge area as a mixed-use regeneration area and includes: <i>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.</i> The City Edge SURF fulfils the requirements of CS2 Objective 1 above.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	

i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.
ii. Comprises significant previously developed and/or under-utilised lands;
The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.
iii. Is within or adjoining the core of an established or designated urban settlement;
<i>The Priority Development Areas (PDAs) within the SURF comprise, and directly adjoin, the core of a designated metropolitan urban settlement.</i> <i>The PDAs are located within the existing built-up footprint of Dublin, form part of the wider strategic City Edge regeneration area, and are intended to develop as compact, mixed-use urban neighbourhoods supported by extensive social, commercial and transport infrastructure.</i> <i>Each PDA demonstrates the characteristics of a Core Area, as they are planned to intensify a broad range of employment, retail, commercial, community, residential and transport functions, and are also served by a wider existing and planned transport network.</i> <i>The PDAs are further supported by their proximity to a number of established urban centres.</i>

To the west of the PDAs is Clondalkin Town Centre, which is designated as a Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing an established concentration of retail, employment, community and residential functions.

To the north of the PDAs is Ballyfermot, identified as a Key Urban Village in the Dublin City Development Plan 2022–2028. Key Urban Villages are defined as centres that focus on retail activity and sustainable urban living, supported by access to high-quality public transport, such as the Luas Red Line and planned BusConnects routes.

To the south is Tallaght Town Centre, designated as a Major Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing a significant concentration of retail, employment, community and transport functions.

To the east, Dublin City Centre constitutes an already well-established core, providing the highest concentration of employment, retail, community, residential and transport functions.

Taken together, the concentration of these characteristics demonstrates that the PDAs are not peripheral development lands but form part of a strategically important mixed-use urban centre within the Dublin metropolitan area. As such, they satisfy the definition of a Core Area and therefore meet Criterion 2(iii) of the Plan-Making Justification Test.

~~City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.~~

iv. Will be essential in achieving compact and sustainable urban growth;

As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving

compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. 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.	
v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	
The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no more suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.	
3. 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 development plan preparation 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the River Camac with affected areas lying largely	

within Flood Zone B. The Camac Flood Alleviation Scheme (CFAS) will provide more robust modelling of the pre-scheme flood zones and will develop defences for ~~this area~~ *existing properties*.

The PDA zoning includes a proposed linear park along the Camac which will provide space for any future defences while enhancing biodiversity by allowing future removal of the existing culvert and conversion of land use from light industry to parkland. The development of Area 1 will be carried out in consultation with the Camac Flood Alleviation Scheme designers to ensure that the development will not impede the flood alleviation scheme and to ensure that finished floor levels are appropriate for the location.

The land uses within the Priority Development Areas are identified for mixed use *and* not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels.

The SURF SWRM2 policy requires development proposals to take account of 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). In areas of flood risk this will mean that ground floor uses will be required to be compatible with the Flood Zone B classification. *The finished ground floor levels and evacuation route levels will be raised above the expected flood level to minimise risk.*

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

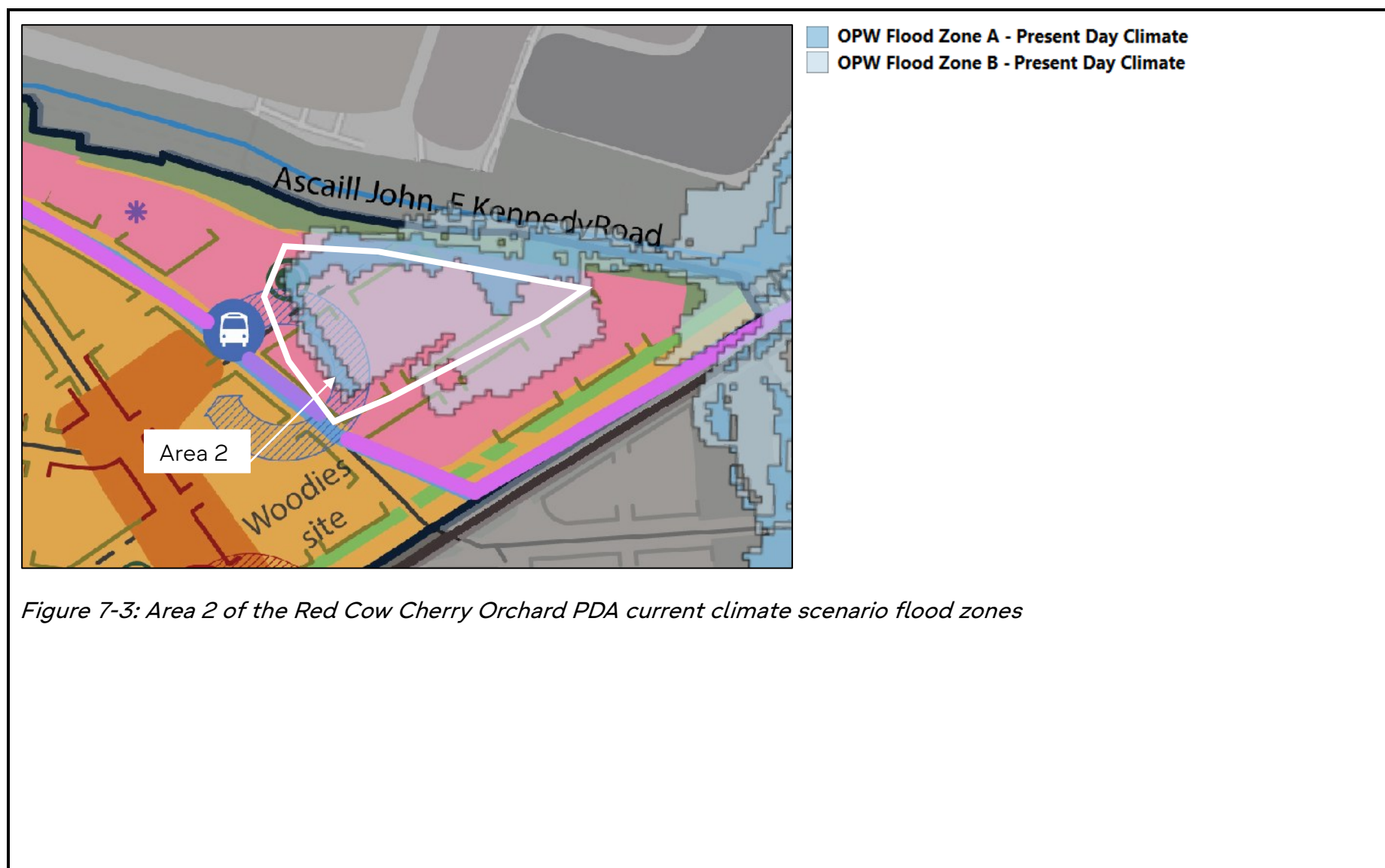
Together, these measures demonstrate that flood risk can be managed appropriately through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere.

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the Area 1 lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.3 Red Cow and Cherry Orchard PDA Justification Test – Area 2

The SDCC development plan 2022-2028 has zoned the Red Cow and Cherry Orchard PDA for enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. The draft SURF, in turn, identifies this part of the PDA (Area 2) for Employment-Led Mixed Use. The key element of the proposed land use strategy 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 proposed PDA layout and uses are compatible with the Development Plan zoning objective.

The development proposed in Flood Zone B consists of employment led mixed use development which is categorised as less vulnerable development and is appropriate in Flood Zone B. Part of this area is in Flood Zone A and the proposed employment led mixed use development requires a justification test in this area. Area 2 for the justification test is the employment led mixed use designation in Flood Zone A as shown in Figure 7-3.



JUSTIFICATION TEST FOR DEVELOPMENT PLANS	
1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	
The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028). As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area [City Edge] has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses The SDCC development plan 2022-2028 identifies the City Edge area as a mixed-use regeneration area and includes: <i>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.</i> The City Edge SURF fulfils the requirements of CS2 Objective 1 above.	
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	

The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.
ii. Comprises significant previously developed and/or under-utilised lands;
The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.
iii. Is within or adjoining the core of an established or designated urban settlement;
<i>The Priority Development Areas (PDAs) within the SURF comprise, and directly adjoin, the core of a designated metropolitan urban settlement.</i> <i>The PDAs are located within the existing built-up footprint of Dublin, form part of the wider strategic City Edge regeneration area, and are intended to develop as compact, mixed-use urban neighbourhoods supported by extensive social, commercial and transport infrastructure.</i> <i>Each PDA demonstrates the characteristics of a Core Area, as they are planned to intensify a broad range of employment, retail, commercial, community, residential and transport functions, and are also served by a wider existing and planned transport network.</i> <i>The PDAs are further supported by their proximity to a number of established urban centres.</i> <i>To the west of the PDAs is Clondalkin Town Centre, which is designated as a Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing an established concentration of retail, employment, community and residential functions.</i>

To the north of the PDAs is Ballyfermot, identified as a Key Urban Village in the Dublin City Development Plan 2022–2028. Key Urban Villages are defined as centres that focus on retail activity and sustainable urban living, supported by access to high-quality public transport, such as the Luas Red Line and planned BusConnects routes.

To the south is Tallaght Town Centre, designated as a Major Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing a significant concentration of retail, employment, community and transport functions.

To the east, Dublin City Centre constitutes an already well-established core, providing the highest concentration of employment, retail, community, residential and transport functions.

Taken together, the concentration of these characteristics demonstrates that the PDAs are not peripheral development lands but form part of a strategically important mixed-use urban centre within the Dublin metropolitan area. As such, they satisfy the definition of a Core Area and therefore meet Criterion 2(iii) of the Plan-Making Justification Test.

~~City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.~~

iv. Will be essential in achieving compact and sustainable urban growth;

As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations.

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.
v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no more suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.
3. 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 development plan preparation 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the River Camac with affected areas lying largely within Flood Zone A. The ongoing Camac Flood Alleviation Scheme (C FAS) will provide more robust modelling of the pre-scheme flood zones and will develop defences for ~~this area~~ existing at-risk properties. <i>The PDA includes a proposed linear park along the Camac which will provide space for any future defences while enhancing biodiversity by allowing conversion of land use from light industry to parkland. The development of Area 2 will be carried out in consultation with the Camac Flood Alleviation Scheme</i>

designers to ensure that the development will not impede the Flood Alleviation Scheme and to ensure that finished floor levels are appropriate for the location.

The land uses within the Priority Development Areas are identified for mixed use *and* not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels.

The SURF SWRM2 policy requires development proposals to take account of 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). ~~In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone A classification.~~ *Where any proposed uses are not compatible with flood zone A, the finished ground floor levels and evacuation route levels will be raised above the expected flood level to minimise risk. This will reduce the risk from Flood Zone A, however a site-specific flood risk assessment will be required to address any impacts of potentially displacing floodwater from the site.*

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere.

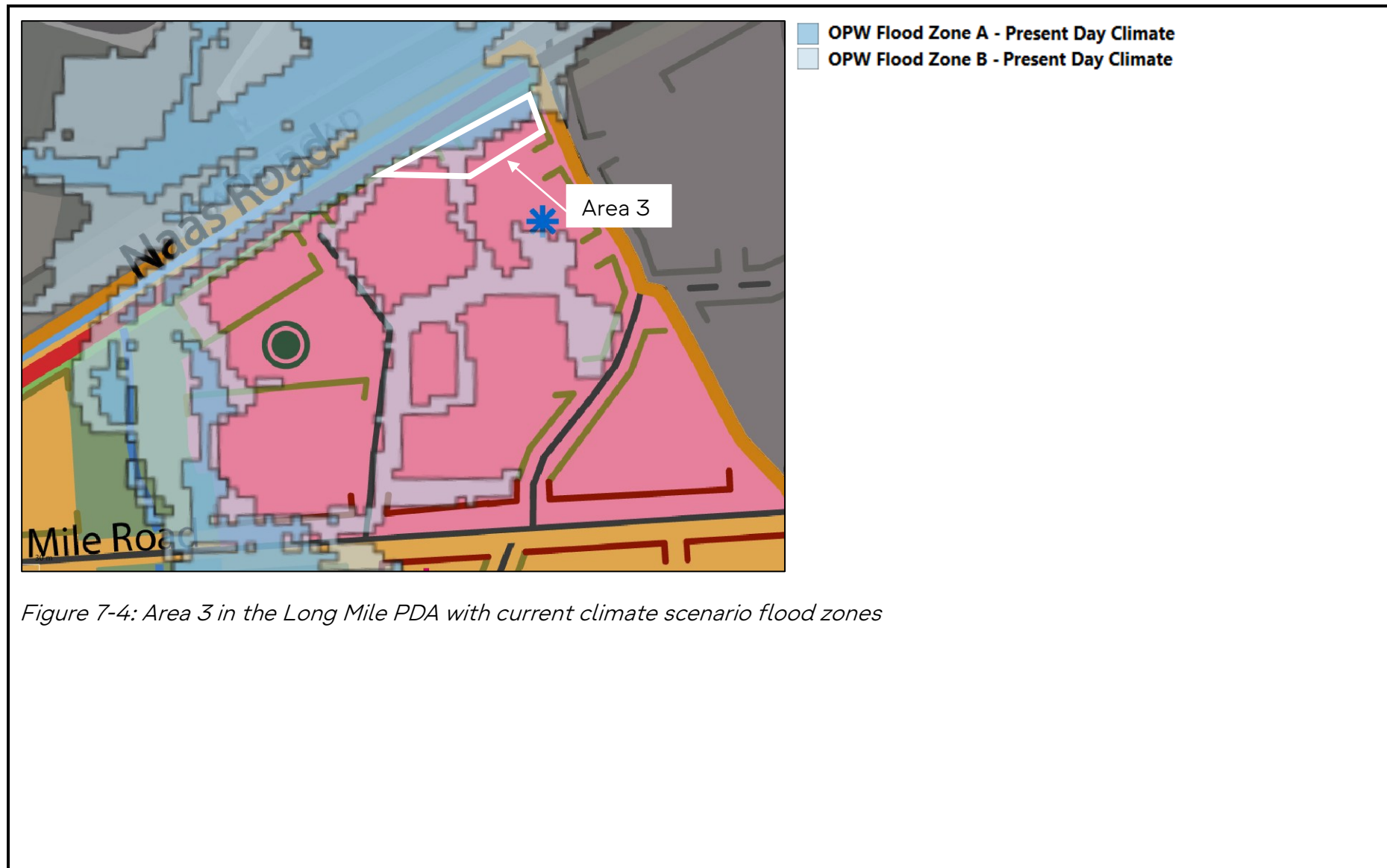
Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.4 Long Mile PDA Justification Test Area 3

The SDCC development plan 2022-2028 has zoned this part of the Long Mile PDA as 'REGEN' with the objective 'To facilitate enterprise and / or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery' The draft SURF, in turn designates the area for Employment-Led Mixed Use. The key element of the proposed land use within City Edge is that all categories are mixed use, with the use emphasis varying from category-to-category e.g. Residential Led Mixed Use, Employment Led Mixed Use etc. The proposed PDA layout and structure including indicative uses is compatible with the Development Plan zoning.

In some parts of this PDA the development proposed in Flood Zone B consists *of residential led mixed used development which is highly vulnerable development requiring a justification test. In other areas of Flood Zone B the development consists* of employment led mixed use development which is categorised as less vulnerable development and is appropriate in Flood Zone B. Part of this employment led development is also proposed in Flood Zone A and this part requires a justification test.

Area 3 for the justification test is the employment-led mixed-use designation in Flood Zone A as shown in Figure 7-4.



JUSTIFICATION TEST FOR DEVELOPMENT PLANS	
1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	
The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028). As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses The SDCC development plan 2022-2028 identifies the City Edge area as a mixed-use regeneration area and includes: <i>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.</i> The City Edge SURF fulfils the requirements of CS2 Objective 1 above.	
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	

i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.
ii. Comprises significant previously developed and/or under-utilised lands;
The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.
iii. Is within or adjoining the core of an established or designated urban settlement;
<i>The Priority Development Areas (PDAs) within the SURF comprise, and directly adjoin, the core of a designated metropolitan urban settlement.</i> <i>The PDAs are located within the existing built-up footprint of Dublin, form part of the wider strategic City Edge regeneration area, and are intended to develop as compact, mixed-use urban neighbourhoods supported by extensive social, commercial and transport infrastructure.</i> <i>Each PDA demonstrates the characteristics of a Core Area, as they are planned to intensify a broad range of employment, retail, commercial, community, residential and transport functions, and are also served by a wider existing and planned transport network.</i> <i>The PDAs are further supported by their proximity to a number of established urban centres.</i>

To the west of the PDAs is Clondalkin Town Centre, which is designated as a Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing an established concentration of retail, employment, community and residential functions.

To the north of the PDAs is Ballyfermot, identified as a Key Urban Village in the Dublin City Development Plan 2022–2028. Key Urban Villages are defined as centres that focus on retail activity and sustainable urban living, supported by access to high-quality public transport, such as the Luas Red Line and planned BusConnects routes.

To the south is Tallaght Town Centre, designated as a Major Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing a significant concentration of retail, employment, community and transport functions.

To the east, Dublin City Centre constitutes an already well-established core, providing the highest concentration of employment, retail, community, residential and transport functions.

Taken together, the concentration of these characteristics demonstrates that the PDAs are not peripheral development lands but form part of a strategically important mixed-use urban centre within the Dublin metropolitan area. As such, they satisfy the definition of a Core Area and therefore meet Criterion 2(iii) of the Plan-Making Justification Test.

~~City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.~~

iv. Will be essential in achieving compact and sustainable urban growth;

As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient

use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. 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.	
v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	
The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.	
3. 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 development plan preparation 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the Ballymount Stream and the River Camac with affected areas lying largely within Flood Zone A. The ongoing Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme flood zones and will develop defences for ~~this area~~ <i>existing at-risk properties</i>.	

The development of Area 3 will be carried out in consultation with the Camac Flood Alleviation Scheme designers to ensure that the development will not impede the flood alleviation scheme and to ensure that finished floor levels are appropriate for the location.

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.

The SURF SWRM2 policy requires development proposals to take account of 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). ~~In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone A classification.~~ *Where any proposed uses are not compatible with Flood Zone A, the finished ground floor levels and evacuation route levels will be raised above the expected flood level to minimise risk. This will reduce the risk from Flood Zone A, however a site-specific flood risk assessment will be required to address any impacts of potentially displacing floodwater from the site.*

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.5 Long Mile PDA Justification Test – Area 4

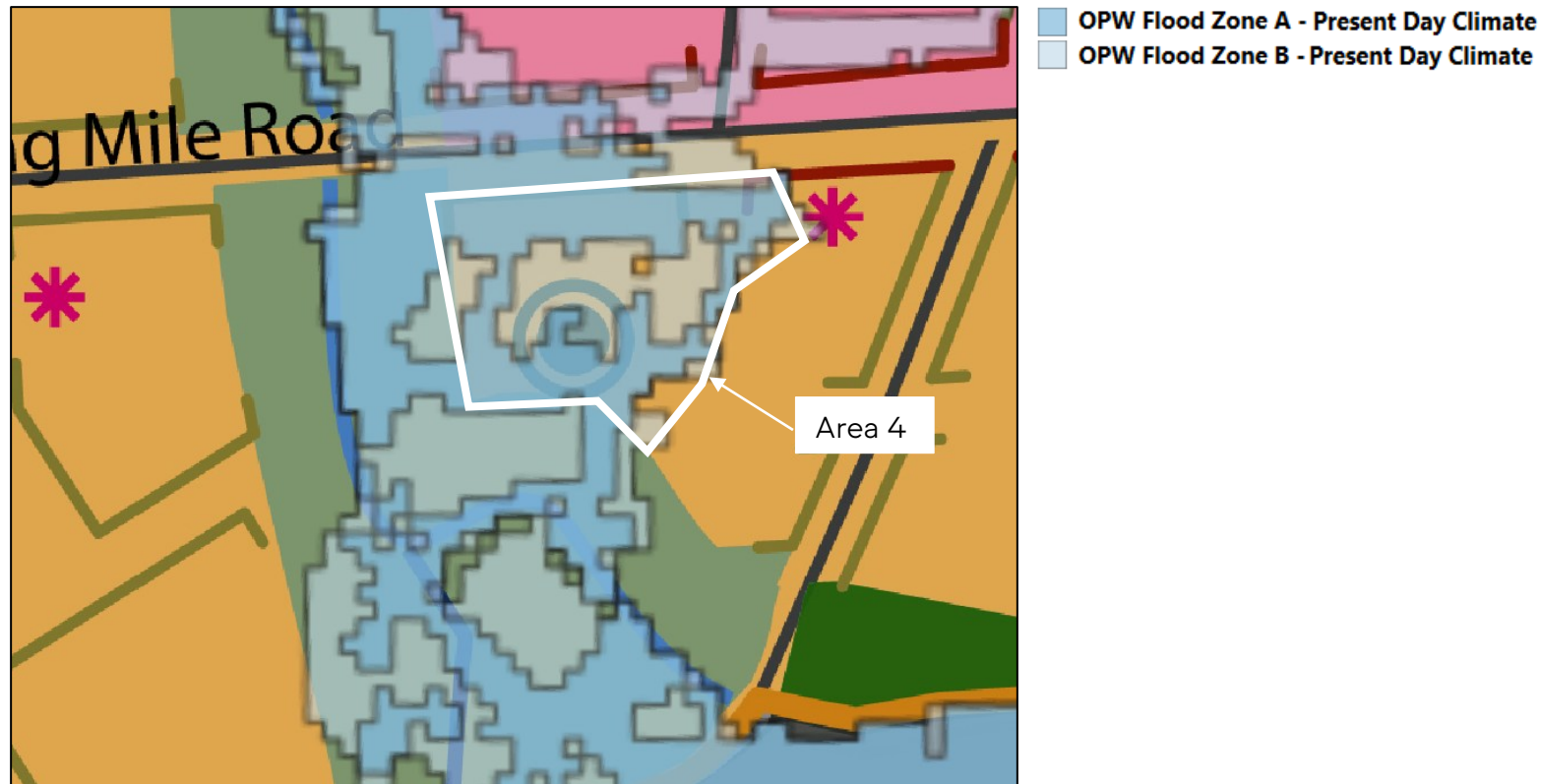


Figure 7-5: Area 4 in the Long Mile PDA with current climate scenario flood zones

The SDCC development plan 2022-2028 has zoned the Long Mile PDA 'REGEN', 'to facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. This area of the Long Mile PDA is, in turn, identified for Residential-Led Mixed Use and a linear park in the Draft SURF. The key element of the proposed land use strategy within City Edge is that all categories are mixed use, with the use emphasis varying from

category-to-category e.g. Residential Led Mixed Use, Employment Led Mixed Use etc. This zoning is compatible with the proposed PDA structure including layout and indicative uses are compatible with the Development Plan zoning objective.

The development proposed in Flood Zone A and B consists of residential led mixed use development which is categorised as highly vulnerable development *and* requires *a* justification test in this area.

Area 4 for the justification test is the area identified for Residential-Led Mixed Use designation in Flood Zone A and B as shown in Figure 7-5.

JUSTIFICATION TEST FOR DEVELOPMENT PLANS

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028).

As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses

The SDCC development plan 2022-2028 identifies the City Edge area as a mixed-use regeneration area and includes:

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

<i>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.</i> The City Edge SURF fulfils the requirements of CS2 Objective 1 above.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.
ii. Comprises significant previously developed and/or under-utilised lands;
The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.
iii. Is within or adjoining the core of an established or designated urban settlement;
<i>The Priority Development Areas (PDAs) within the SURF comprise, and directly adjoin, the core of a designated metropolitan urban settlement.</i> <i>The PDAs are located within the existing built-up footprint of Dublin, form part of the wider strategic City Edge regeneration area, and are intended to develop as compact, mixed-use urban neighbourhoods supported by extensive social, commercial and transport infrastructure.</i>

Each PDA demonstrates the characteristics of a Core Area, as they are planned to intensify a broad range of employment, retail, commercial, community, residential and transport functions, and are also served by a wider existing and planned transport network.

The PDAs are further supported by their proximity to a number of established urban centres.

To the west of the PDAs is Clondalkin Town Centre, which is designated as a Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing an established concentration of retail, employment, community and residential functions.

To the north of the PDAs is Ballyfermot, identified as a Key Urban Village in the Dublin City Development Plan 2022–2028. Key Urban Villages are defined as centres that focus on retail activity and sustainable urban living, supported by access to high-quality public transport, such as the Luas Red Line and planned BusConnects routes.

To the south is Tallaght Town Centre, designated as a Major Town Centre in the retail hierarchy of the South Dublin County Development Plan 2022–2028, providing a significant concentration of retail, employment, community and transport functions.

To the east, Dublin City Centre constitutes an already well-established core, providing the highest concentration of employment, retail, community, residential and transport functions.

Taken together, the concentration of these characteristics demonstrates that the PDAs are not peripheral development lands but form part of a strategically important mixed-use urban centre within the Dublin metropolitan area. As such, they satisfy the definition of a Core Area and therefore meet Criterion 2(iii) of the Plan-Making Justification Test.

~~City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.~~
iv. Will be essential in achieving compact and sustainable urban growth;
As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. 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.
v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.
3. 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 development plan preparation 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the Ballymount Stream and the River Camac with affected areas lying largely within Flood Zone A and B. The ongoing Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme flood zones and will develop defences for ~~this area~~ *existing at-risk properties*.

The PDA designation includes a proposed linear park along the Robinhood stream which will provide space for any future defences while enhancing biodiversity by allowing conversion of land use from the existing light industry to parkland. The development of Area 4 will be carried out in consultation with the Camac Flood Alleviation Scheme designers to ensure that the development will not impede the flood alleviation scheme and to ensure that finished floor levels are appropriate for the location.

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. *The PDA designation also allows for a community park to be developed in Area 4. The community park will be water compatible development.*

The SURF SWRM2 policy requires development proposals to take account of 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). ~~In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone A classification.~~ *Where any proposed uses are not compatible with Flood Zone A, the finished ground floor levels and evacuation route levels will be raised above the expected flood level to minimise risk. This will reduce the risk from*

Flood Zone A, however a site-specific flood risk assessment will be required to address any impacts of potentially displacing floodwater from the site.

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately by requiring appropriate land uses for the ground floors of buildings and through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere.

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.6 Greenhills PDA

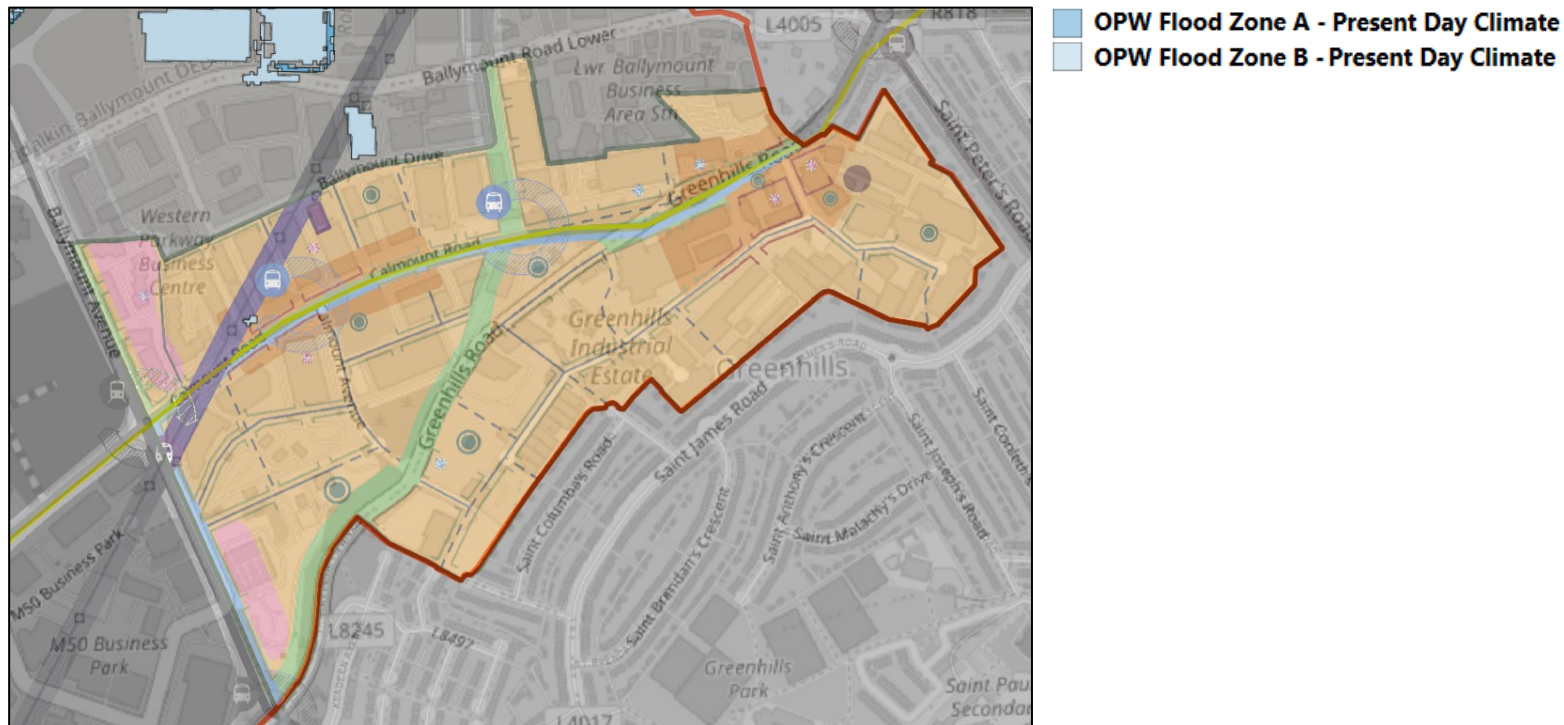


Figure 7-6: Greenhills PDA with current climate scenario flood zones

The SDCC development plan 2022-2028 has zoned this area as REGEN - To facilitate employment and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. *The proposed PDA layout and land uses are compatible with this zoning.* ~~This zoning is compatible with the proposed PDA structure.~~

The current scenario flood maps show no areas of the PDA within Flood Zone A or B and therefore no justification test is required for any part of this PDA.

7.7 Conclusions

The Justification Test for Development Plans has been applied to the City Edge SURF PDAs and has been satisfied. This is due to the land uses within the Priority Development Areas being zoned for mixed use and not solely residential or employment use, thereby providing for lower vulnerability uses to be accommodated at lower floor levels.

The SURF demonstrates that development of the lands in these areas enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS. Site specific FRAs for individual developments will be carried out where the development is proposed in a flood risk area, and further justification testing will be applied during the site specific FRAs where necessary.