

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

The Eastern and Midland Regional Assembly (EMRA) notes the statutory public consultation on proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028, City Edge Strategic Urban Regeneration Framework (SURF). The Assembly welcomes the opportunity to consult and sets out hereunder recommendations and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 8th May 2026.

1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of City and County Development Plans and Local Economic and Community Plans, management of EU Operational Programmes, EU project participation, and the implementation of national economic policy. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES 2019-2031, was provided for in the Planning and Development (P&D) Act 2000, as amended, which included support for and alignment with the economic policies and objectives of the Government. However, this legislation has been superseded by the Planning and Development (P&D) Act 2024, as amended, which was signed into law on 17th October 2024. The provisions of the P&D Act 2024, as amended, relevant to the Regional Assemblies commenced on 2nd October 2025. The P&D Act 2024, as amended, expands the scope of the RSES and the functions of the Regional Assembly. The Regional Assembly is further mindful of its obligations, as a 'relevant body', as prescribed under the Climate Action and Low Carbon Development Act 2015, as amended, to perform its functions in a manner consistent with the need to achieve Ireland's national climate objective.

1.1 Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was made by the Elected Members of the Assembly in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports opportunities and the wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunities for all.

The vision of the RSES is supported by sixteen Regional Strategic Outcomes (RSOs), that are aligned with National Strategic Outcomes (NSOs) of the National Planning Framework (NPF) and framed around the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), achieve alignment of investment priorities with those of the National Development Plan (NDP) and the National Marine Planning Framework (NMPF), and thus Project Ireland 2040, by coupling new development with the requisite investment in services and infrastructure. In doing so, the RSES supports the spatial, economic and climate policies and objectives of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their City and County Development Plans (CDPs), and Local Economic and Community Plans (LECPs) in a manner that will ensure alignment between national, regional and local plans.

The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region. Embedded within the RSES, is the first statutory Dublin Metropolitan Area Strategic Plan (MASP), which sets out a vision and spatial Framework to better manage the sustainable growth of the Dublin Metropolitan Area.

1.2 Review of the Regional Spatial and Economic Strategy (RSES)

In accordance with Part 3 of the Planning and Development Act 2024, as amended, EMRA has commenced a review of the RSES for the Eastern and Midland Region, which will build on the progress made under the first RSES. South Dublin County Council (SDCC) will be aware that the pre-draft public consultation of the RSES review commenced on 26th March 2026 and will end on 22nd of May 2026¹ and will include engagement with the local authorities within the Eastern and Midland Region (including SDCC) and other relevant stakeholders.

The Act requires that the new RSES 'shall be materially consistent' with the Project Ireland 2040 including the NPF 2025, NMPF 2021, NDP 2025, and other national policies and measures.

1.3 Context for Submission

Under the P&D 2024, the Regional Assembly no longer has a statutory obligation to prepare a submission in relation to proposed Variations to local authority Development Plans. Having regard to the particulars of Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028,

¹ Pre-Draft RSES Public Consultation Link: [Pre-DRAFT RSES Public Consultation - Strategic Issues Paper | Eastern and Midland Regional Assembly's Consultation Portal](#)

the Assembly considers that its content is of regional relevance and that a submission is warranted. In this regard, it is noted that the City Edge Project features as a case study of large-scale brownfield regeneration in the NPF 2025 which can *“achieve Government policies of compact growth and transport-orientated development at scale, to reach national climate targets, and to make a significant contribution to resolving the housing crisis, while also generating substantial employment opportunities”*.

Furthermore, the City Edge lands are identified in Table 5.1 of the Dublin Metropolitan Area Strategic Plan (MASP) of the RSES, as a strategic long-term landbank for the Dublin Metropolitan Area with the potential to deliver on the NPF 2025 and the RSES strategic outcome of Compact Growth and to drive the sustainable growth of the Dublin Metropolitan Area. Therefore, the Assembly considers the City Edge Project to be of strategic importance, given its scale and transformational potential.

2.0 Submission

The Regional Assembly notes that the primary purpose of the Variation is to incorporate the City Edge Strategic Urban Regeneration Framework (SURF) as an appendix to the South Dublin County Development Plan 2022-2028. This will provide a statutory plan for future planning of the SDCC portion of City Edge lands and fulfil the requirements of Development Plan policy CS2 Objective 1. In addition, the Assembly notes the intention of SDCC to seek designation of the City Edge as a candidate Urban Development Zone (UDZ) once the relevant sections of the P&D Act 2024, as amended, have commenced.

The City Edge lands straddle the SDCC and Dublin City Council (DCC) functional areas and the project is a partnership between the said local authorities. The brownfield lands are located at the western edge of Dublin City, within the M50 and proximate to the city centre. However, for planning purposes, SDCC has prepared a Draft City Edge SURF within its functional area. The City Edge sites within the SDCC administrative area constitute 28% (128ha) of the total land area of the entire City Edge Project and are expected to accommodate over 9,000 new homes and create more than 8,500 jobs.

The Draft City Edge SURF builds on, and it is informed by the previous non-statutory City Edge Strategic Framework 2022. The Regional Assembly prepared a submission in relation to the City Edge Strategic Framework which is annexed herewith. The Regional Assembly acknowledges that since the preparation of the City Edge Strategic Framework, additional research and analysis has been undertaken in preparing the Draft City Edge SURF. This additional analysis focused on identifying Priority Development Areas (PDAs) and refining the non-statutory Framework (2022) under the themes of Movement, Natural Infrastructure, Spatial Configuration, Economy, Land Use and Layout, and Community and Cultural Infrastructure.

2.1 Urban Development Zone (UDZ) Designation

As outlined in the Draft SURF, one of the purposes of the proposed Variation is to seek candidate UDZ designation for City Edge sites following the adoption of the Draft City Edge SURF. In so doing, the Draft SURF seeks to set out the planning framework required for candidate UDZ status under the P&D Act 2024, as amended. As noted in the Draft SURF, Part 22 of the P&D Act 2024, as amended, relating to the UDZs has not yet commenced and SDCC will only proceed to seek candidate UDZ status once the relevant sections of the Act have commenced. The inclusion of a planning framework in the Draft City Edge SURF is a pro-active approach and the Regional Assembly recommends that SDCC takes all appropriate steps to ensure that the content requirements for a planning framework as outlined in Section 603 of the Act are sufficiently addressed in the Draft City Edge SURF to ensure compliance with the P&D Act 2024, as amended.

The Regional Assembly notes the statement by SDCC that *“notwithstanding [the separate UDZ designation process], SDCC and DCC will continue to work in close partnership to implement the sustainable regeneration of City Edge in accordance with the overarching pathway set out in the City Edge Strategic Framework (2022)”*. To ensure effective implementation, the Assembly recommends that the City Edge SURF incorporates robust, formalised multi-authority governance arrangements, including mechanisms for structured collaboration between the relevant local authorities, public bodies and the Regional Assembly. Such arrangements should focus on joint decision-making, infrastructure coordination, and alignment with RSES objectives.

Accordingly, the Assembly supports a UDZ-led approach for City Edge, underpinned by robust governance structures, to ensure both the effective coordination of planning across administrative boundaries and the accelerated delivery of strategic development in line with national and regional priorities. In this regard, the Assembly welcomes the establishment of a City Edge Steering Group to facilitate co-ordination and implementation of vital infrastructure and policy requirements and the unity of purpose needed to realise a project of this scale. The Assembly recommends the inclusion of the Regional Assembly in the membership of the City Edge Steering Group to ensure full alignment between the City Edge and national and regional policies, including the RSES and the Dublin MASP.

2.2 Priority Development Areas (PDAs)

The Regional Assembly notes the identification of three Priority Development Areas (PDAs), namely, Red Cow & Cherry Orchard (52ha), Long Mile (23ha) and Greenhills (53ha) within the City Edge SURF. The PDAs were refined from the Early Development Areas of the City Edge Strategic Framework 2022. The PDAs set out where development, inclusive of key infrastructure, will be focussed in the short to medium term to support the regeneration of the area. The Regional Assembly notes that the PDAs were identified based on public transport accessibility, proximity to facilities and community infrastructure, planning and development context and constraints (Seveso sites, flood risk and overhead high voltage lines). The Draft City Edge SURF further provides objectives and general

principles for development within and outside of PDAs. The majority of the areas contained in the three PDAs are zoned REGEN *'to facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery'*. Population targets, housing targets, job targets and employment floor space targets have been calculated for each PDA. Accordingly, the Regional Assembly welcomes the proposed PDAs and their associated targets as they enable sequential development, in line with Table 5.1 of the MASP.

2.3 Integrated Land Use and Transportation Strategy

National Policy Objectives (NPOs) 10 and 97 of the NPF 2025 support Transport-Orientated Development (TOD) at suitable locations served by high-capacity public transport and located within/adjacent to the built-up footprint of the five cities. SDCC forms part of the Dublin MASP and it is a statutory requirement that the RSES and Development Plans, inclusive of the City Edge SURF, within the GDA are mutually consistent with the Greater Dublin Area Transport Strategy 2022-2042, as prepared by the NTA. The Regional Assembly notes the strategic objectives of the Draft City Edge SURF to promote *"sustainable movement, the 10-minute city principle and compact growth, so that all future residents and workers will have access to essential daily services within a short walk or cycle and easy access to high-quality public transport"*. The strategic objectives align with Regional Policy Objectives (RPOs) 8.2-8.4 and 9.10 (healthy placemaking) of the RSES 2019. The Assembly welcomes explicit support for these principles and invites SDCC to consider the [15-Minute City Implementation Pathway](#) report prepared by EMRA (2025). The Council's attention is further drawn to the [Smart and Sustainable Mobility Academy](#) which is a repository of knowledge, showcasing case studies, project outcomes, and ongoing advancements across all local authorities for active travel and sustainable mobility. This repository is a key output of the Pathfinder 27 Project, the Smart and Sustainable Mobility Accelerator Programme (SSMA), which was delivered by the Assembly for the Eastern and Midland Region.

The Regional Assembly welcomes the commitment by SDCC to continue engagements with the NTA, TII and other stakeholders to ensure alignment and coordination during plan making and implementation of a number of short, medium and long-term planned transport schemes within the City Edge Project. The MASP Implementation Group, organised by EMRA, also provides a platform to ensure the co-ordinated provision of transport and infrastructure in the Dublin Metropolitan Area.

2.4 Housing

Housing provision, affordability, and homelessness are among the key challenges facing the Dublin Metropolitan Area (DMA). The NPF 2025 projects a population of 6.1 million people nationally by 2040 (an increase of approximately 950,000 people) and provides for a national housing target of 50,000 new homes per annum until 2040. In line with regional parity, EMRA will be required to deliver 50% (25,000 new homes per annum) of the national housing targets. In terms of the NPF Implementation

Housing Growth Requirements, SDCC has a housing target of providing 3,270 new homes per annum to 2034 and providing 2,414 homes per annum between 2035-2040.

Given the above, the overall City Edge vision is to provide up to 40,000 new homes and accommodate 75,000 - 80,000 people between now and 2070, translating to the provision of circa 9,084 new homes within the proposed 3 PDAs in the short to medium term. The Regional Assembly welcomes the ambition of the Draft City Edge SURF, and the stated vision that *“these homes will be integrated in compact mixed-use neighbourhoods designed along 10-minute settlement principles, with accessible high quality open space and green infrastructure; where employment opportunities, community facilities and services are in close proximity; and where movement is based on walking, cycling and public transport.”*

Regional Policy Objectives (RPOs) 9.1-9.6 of the RSES require local authorities to ensure the *“integration of age friendly and family friendly strategies in development plans...including provision for flexible housing type and tenure, including social and affordable housing and explore new models of low-cost rental and affordable homeownership.”* As per the SCOT analysis conducted as part of the South Dublin Local Economic and Community Plan, 2024-2030, one of the key constraints in SDCC is the concentration of high and extreme disadvantaged groups and key threats includes greater wealth disparity and increase of cost of living beyond income and social welfare/pension payments. In this regard, the Regional Assembly welcomes the City Edge International Best Practice Housing Review conducted in 2022 to provide an evidence base for fostering diverse sustainable communities and liveable neighbourhoods within the City Edge Project. The Assembly considers that the recommendations of the research should be used to inform the implementation of the City Edge SURF, with periodic monitoring to ensure that best practices are established and replicated. SDCC should ensure that these recommendations are considered in light of the most recent available data, including Census 2022.

2.5 Provision of Social Infrastructure

As noted at the recent conference of the Irish Planning Institute in April 2026, geopolitical unrest, global trade uncertainty and reduction in government and EU funding supports for social and economic purposes are some of the threats to proper planning and sustainable development across all planning scales. Thus, prioritising the provision of social infrastructure at City Edge will be key to protect vulnerable groups and fulfil the ‘common good’ mandate. The Regional Assembly welcomes the commitment by SDCC to implement an urban schools model and the proactive multi-agency and multi-stakeholder approach to planning for schools, healthcare and community facilities (community centres, childcare, primary care centres, libraries and spaces for enterprise) in the proposed City Edge PDAs.

The Regional Assembly further welcomes the proposal for the co-location of arts facilities with other infrastructure such as libraries and enterprise centres within the three PDAs and commends the

innovative proposals for the provision of social infrastructure within the City Edge SURF. The Assembly recommends that structured collaboration with social infrastructure providers is facilitated to ensure effective and integrated delivery of social infrastructure across the City Edge.

2.6 Economic Development and Employment

One of the strategic objectives of the City Edge Project is to *“facilitate employment in mixed use contexts along with intensification and diversification”* with scope to create up to 65,000-75,000 jobs. The Draft City Edge SURF targets the creation of more than 8,500 jobs within the three PDAs. Almost all the three PDAs are zoned REGEN *‘to facilitate enterprise and/or residential-led regeneration’*. The employment spine running parallel to the M50 is zoned ‘EE’ (Enterprise and Employment) which is intended to allow the continuation of more industrial type employment in the area. Three urban centres are proposed, along the Naas Road/Kylemore Road, at the proposed new Kylemore train station and a local centre close to Inchicore.

The Regional Assembly welcomes the Economic Analysis Study which informed the City Edge Project. The study highlighted that *“achieving a resilient and diverse employment base will require the retention of some existing industry along with the introduction of new urban industry workspaces, innovation spaces, local services and high-density office employment”*. The study outlined short, medium and long terms goals in terms of the types of employment uses /sectors to be retained and attracted within City Edge over the years. Expected growth areas in the short term are Logistics and Storage, Construction and E-Gaming. Medium term growth areas identified are Fin Tech, Med Tech and Green Energy and Tech. In the long term, Aviation Services and Bio Pharma are predicted to be areas that will expand. The Regional Assembly notes the Economic Analysis Study findings and welcomes alignment of recommendations with the National Smart Specialisation Strategy for Innovation 2022-2027 and the Dublin Regional Enterprise Plan to 2024 which outlines ICT, Financial Services and Biopharma/Life Sciences as key sectoral strengths for Dublin. The Assembly recommends that SDCC ensures that the economic development, enterprise and innovation aspects of the final City Edge SURF is consistent with the economic strategy of the RSES for the Eastern and Midland Region and the South Dublin Local Economic and Community Plan.

2.7 Re-purposing of existing buildings & adaptability of new buildings

NPO 67 of the NPF 2025 encourages support for circular and bioeconomy principles through re-use and refurbishment of existing buildings and structures. The RSES provides guiding principles on dealing with complexities of brownfield regeneration and require local authorities to set out measures that *“...promote the reuse, refurbishment and retrofitting of existing buildings within the urban centres”*. The Regional Assembly welcomes the promotion of reuse, repair, adaptation and upgrading of existing buildings within the Draft City Edge SURF.

2.8 Renewable Energy

Pursuant to Sections 29 and 44 of the P&D Act 2024, as amended, it is a statutory requirement that the RSES includes a strategy relating to onshore renewable energy and that planning authorities prepare a strategy for sustainable development and regeneration, inclusive of renewable energy generation. The NPF 2025 sets national targets of 9GW of onshore wind, 5GW of offshore wind, and 8GW of solar by 2030. NPO 74 of the NPF 2025 states that “*each Regional Assembly must plan through their [RSES], for the delivery of the regional renewable electricity capacity allocations...*”. Accordingly, the Regional Assembly is required to incorporate targets of 1,966MW for onshore wind and 3,294MW for solar PV for the Region by 2030. Furthermore, NPO 75 of the NPF 2025 requires local authorities to “*plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant [RSES] through their City and County Development Plans*”. The allocation of targets to individual local authorities will be considered as part of the RSES Review process.

The Regional Assembly welcomes the promotion of harnessing of waste heat for district heating and other energy efficiency measures within the City Edge SURF and encourages SDCC to further explore measures to support renewable energy generation, particularly solar energy, within the City Edge PDAs and its wider functional area. Some of the innovative approaches for solar energy generation include the use of rooftops and building façades, smart windows, community solar projects, shared solar gardens, and solar canopies in public spaces and open spaces. SDCC may also consider setting renewable energy targets for each PDA to support monitoring and evaluation.

2.9 Implementation and Monitoring

The Assembly welcomes the inclusion of a dedicated implementation section (Chapter 4) within the SURF strategy, which provides a robust framework for the delivery of the City Edge project. The approach is built upon a flexible, infrastructure-led phasing strategy that ties development progress, specifically residential unit occupation and employment floorspace, to the delivery of essential infrastructure.

Implementation is structured across the three PDAs, with a distinction made between overarching strategic infrastructure (such as BusConnects, major parks, and Primary Care Centres) and PDA-specific local infrastructure (including schools and community parks) through clearly defined "phasing gateways."

The Assembly commends the multi-agency governance model, involving a Steering Group of key stakeholders including DCC, DHLGH, NTA, TII, Uisce Éireann, EirGrid, ESB Networks and the LDA which is essential for coordinating the complex delivery of utilities and transport. The use of sample typologies to illustrate the co-location of residential and employment uses also provides valuable clarity for future development. Notwithstanding, the Assembly considers that the provision allowing the Planning Authority to set aside phasing impediments if infrastructure is deemed non-essential for

a specific proposal may require careful monitoring to ensure that cumulative development does not outpace the delivery of vital services.

While the SURF establishes a robust system of infrastructure-linked phasing gateways and a high-level Steering Group, it lacks a defined, robust monitoring framework to systematically evaluate delivery performance, track the cumulative impact of development against actual infrastructure capacity, or provide a transparent mechanism for reporting progress to stakeholders. The Assembly recommends the establishment of a formal Monitoring and Evaluation (M&E) Framework to be managed by the City Edge Steering Group. This framework should include defined Key Performance Indicators (KPIs) and a requirement for annual progress reports that transparently track the delivery of both strategic and local infrastructure against the residential and employment "phasing gateways". Furthermore, a formal review mechanism should be integrated to oversee the Planning Authority's use of the provision to "set aside" phasing impediments, ensuring that such exemptions do not result in a cumulative deficit of essential services or undermine the long-term integrity of the infrastructure-led strategy.

The Assembly draws attention to the [Regional Development Monitor \(RDM\)](#) which provides a series of mapping and visualisation infrastructures which are intended to be of assistance to local authorities in gaining a greater insight into social, economic and environmental trends to aid better monitoring and decision making.

2.10 Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA)

Strategic Environmental Assessment (SEA): The Strategic Environmental Assessment (SEA) for proposed Variation No. 3 followed a systematic process involving screening, scoping, and the preparation of an Environmental Report to evaluate the potential environmental impacts of the City Edge SURF. Adopting a methodology based on expert judgement, Geographical Information Systems (GIS), and the evaluation of multiple strategic alternatives, the approach assessed the framework against established Strategic Environmental Objectives (SEOs) while maintaining an iterative relationship with the parallel Natura Impact Report and Strategic Flood Risk Assessment. The assessment concluded that the proposed Variation will generate significant positive environmental effects, particularly through its focus on compact brownfield regeneration, transport-orientated development, and the enhancement of green and blue infrastructure corridors like the Grand Canal and River Camac. Ultimately, the SEA concludes that no specific additional mitigation measures are required for the proposed Variation because environmental protection is fundamentally integrated into the SURF's design and is robustly supported by the existing policies of the South Dublin County Development Plan 2022-2028, which will ensure no adverse impacts occur at a strategic scale.

Appropriate Assessment (AA): Screening for Appropriate Assessment (AA) for the SURF was carried out in 2023 in line with the requirements of Article 6(3) of the EU Habitats Directive, as transposed

into Irish law in Part XAB of the Planning and Development Act 2000 (as amended) in relation to land use planning. It was concluded that the potential for the SURF to result in likely significant effects to European Sites could not be ruled out at the screening stage. Accordingly, a Natura Impact Report (NIR) was prepared to inform the Appropriate Assessment of the SURF's potential to result in likely significant effects to European Sites and their qualifying features of interest occurring within the zone of influence of the SURF.

The NIR reviewed the potential impacts arising from the SURF and found that, without the implementation of mitigation measures, the SURF will have the potential to impact upon the Conservation Objectives of five European Sites and their relevant qualifying features that occur within the zone of influence of the SURF. Section 9 of the NIR outlines the environmental safeguards within the South Dublin County Development Plan (CDP) and existing best practice guidelines that will be applied for all land use activities supported by the SURF. The Assembly recommends full application of these safeguards in line with the objectives of the South Dublin CDP to minimise and/or eliminate potential impacts associated with any future land use activities supported and facilitated by the SURF and thereby protect these sites from potential adverse impacts. The implementation of these objectives, along with the additional safeguards within the CDP and the SDCC best practice guidelines will provide a basis for ensuring any future land use facilitated by the SURF will not be supported where they present a risk of unavoidable/un-mitigatable adverse effects to European Sites.

Strategic Flood Risk Assessment (SFRA): The Strategic Flood Risk Assessment (SFRA) for the proposed Variation followed a staged methodology in compliance with the 2009 National Planning Guidelines, evaluating flood risks from fluvial, pluvial, and artificial sources while incorporating High-End Future Scenario (HEFS) climate change projections. Adopting a sequential approach to land-use planning, the assessment applied and successfully satisfied the plan-making Justification Test for development within the identified PDAs. The SFRA ultimately concludes that the City Edge SURF provides a robust framework for managing flood risk through integrated policies such as mandatory site-specific assessments, Sustainable Drainage Systems (SuDS), and the protection of riparian corridors, which ensure that regeneration does not cause unacceptable adverse impacts. This assessment is considered a live document that will be iteratively updated as more refined data becomes available from the ongoing Camac Flood Alleviation Scheme.

3.0 Recommendations/Observations

The Regional Assembly requests that South Dublin County Council takes account of the following issues in the finalisation of the City Edge SURF to ensure consistency with Project Ireland 2040 (National Planning Framework, National Marine Planning Framework and National Development Plan), the Climate Action Plan 2025, the Regional Spatial Economic Strategy (RSES) and any future RSES, and other relevant policies, and in the interest of proper planning and sustainable development.

The following are **recommendations** by the Regional Assembly for the consideration of South Dublin County Council in the preparation of the City Edge SURF:

1. The Assembly recommends that SDCC takes all appropriate steps to ensure that the content requirements for a planning framework as outlined in Section 603 of the Planning and Development Act 2024, as amended, are sufficiently addressed in the Draft City Edge SURF.
Reason: To ensure compliance with the Planning and Development Act 2024, as amended.
2. The Assembly recommends that SDCC ensures that economic development, enterprise and innovation aspects of the final City Edge SURF are consistent with the economic strategy of the RSES for the Eastern and Midland Region and the South Dublin Local Economic and Community Plan.
Reason: To ensure full alignment between the City Edge and national and regional policies, including the RSES and the Dublin MASP.
3. The Assembly recommends full application of the environmental safeguards in the NIR, the associated objectives of the South Dublin CDP and existing best practice guidelines for the implementation of mitigation measures.
Reason: To minimise and/or eliminate potential impacts associated with any future land use activities supported and facilitated by the SURF and thereby protect European Sites from potential adverse impacts.

The following are **observations** by the Regional Assembly for the consideration of South Dublin County Council in the preparation of the City Edge SURF:

1. The Assembly recommends that the City Edge SURF incorporates robust, formalised multi-authority governance arrangements which focus on joint decision-making, infrastructure coordination, and alignment with RSES objectives.
Reason: In the interest of best practise.
2. The Assembly recommends the inclusion of the Regional Assembly in the membership of the City Edge Steering Group.
Reason: In the interest of best practise.
3. The Assembly recommends that structured collaboration with social infrastructure providers is facilitated to ensure effective and integrated delivery of social infrastructure across the City Edge.
Reason: In the interest of best practise.
4. The Assembly recommends the establishment of a formal Monitoring and Evaluation Framework to be managed by the City Edge Steering Group.
Reason: In the interest of best practice.
5. The Assembly invites SDCC to consider the [15-Minute City Implementation Pathway](#) report prepared by EMRA (2025) and the [Smart and Sustainable Mobility Academy](#).

Reason: In the interest of best practice.

6. The Assembly considers that the recommendations of the City Edge International Best Practice Housing Review 2022 should be used to inform the implementation of the City Edge SURF, with periodic monitoring. SDCC should further ensure that these recommendations are considered in light of the most recent available data, including Census 2022.

Reason: In the interest of best practice.

7. The Assembly encourages SDCC to further explore measures to support renewable energy generation, particularly solar energy, within the City Edge PDAs and its wider functional area, and to consider setting renewable energy targets for each PDA to support monitoring and evaluation.

Reason: In the interest of best practice.

8. The Assembly wishes to draw attention to the [Regional Development Monitor \(RDM\)](#) which provides a series of mapping and visualisation tools which are intended to be of assistance to policy and decision makers in gaining a greater insight into social, economic and environmental trends to aid better monitoring.

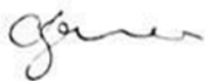
Reason: In the interest of best practice.

4.0 Conclusion

The Regional Assembly acknowledges the proactive approach and extensive preparatory work that SDCC has undertaken in collaboration with the project team in preparing the Draft City Edge SURF and commends SDCC for its comprehensive approach.

The Regional Assembly welcomes further opportunities to engage in the next stages of plan making and notes that officials of the Assembly are available to discuss any of the matters raised above.

Regards,



Clare Bannon,
Director
Eastern and Midland Regional Assembly
8th May 2026

ANNEX A

[Previous EMRA submission and observations](#), dated, 5th October 2021, on the City Edge Project (Link)