

20<sup>th</sup> April 2023

Development Plan Team,  
Planning and Property Development Department,  
Dublin City Council,  
Wood Quay,  
Dublin 8,  
D08 RF3F

**Re: Adopted Dublin City Development Plan 2022 - 2028**

A chara,

The Office of the Planning Regulator (the Office) acknowledges the adoption of the Dublin City Development Plan 2022-2028 (the Development Plan) by the members of Dublin City Council on 2<sup>nd</sup> November 2022.

The Office also acknowledges receipt of your notice letter dated 9<sup>th</sup> November 2022, further to section 31(AM)(6) of the *Planning and Development Act 2000*, as amended (the Act). The adopted Development Plan was reviewed by the Office in accordance with the legislative requirements set out in section 31(AM) of the Act.

The Office generally welcomes and congratulates your planning authority for making a Development Plan which promotes the development of the city in a sustainable manner through driving economic growth, employment and prosperity and in providing access to amenities and services, while setting out a vision for compact forms of development, encouraging sustainable travel, and thereby contributing to reductions in carbon footprint.

The Office acknowledges the challenges faced by the planning authority in formulating a six-year Plan for the planning authority pivotal to the Dublin Metropolitan Area Strategic Plan (MASP) and the requirements to meet ambitious population and housing supply targets for city while addressing key challenges for the city, including housing affordability transport and urban amenities / liveability and offering improved housing choice, transport mobility and quality of life. Further, the Offices notes the scale of the challenge for the Development Plan over the next six years will be to significantly increase housing

to meet the Housing Supply Target for Dublin City of approximately 40,000 units over the plan period.

The Development Plan has embraced many of the challenges set out in the *Project Ireland 2040: National Planning Framework* and the *Regional, Spatial and Economic Strategy*, while setting out a strategy for the growth of the MASP enabling Dublin City to better manage the sustainable and compact growth of the city, and ensuring Dublin City can sustain its competitiveness and provide good quality of life for residents.

In particular, the Development Plan provides a strong focus on the development of infill / brownfield and large regeneration sites suitable for housing and employment aligning development with strategic public transport infrastructure projects. Chapter 13, *Strategic Development Regeneration Areas*, provides a coherent well-presented strategy setting out a framework and vision for compact growth and regeneration on a number of large regeneration and redevelopment sites, particularly with regard to underutilised land within the canal ring and the M50, which will facilitate the redevelopment of infill and brownfield sites therefore providing for alignment with national planning objectives.

The Office reiterates its support for the objective in the Development Plan (QHSNO6) to prepare '*upper floor building re-design guidelines that are sufficiently innovative and flexible to promote the residential use of vacant upper floors*'. This has the potential to provide much needed homes for people in well-located areas close to services, amenities and public transport. The Development Plan clearly acknowledges the importance of activating brownfield and infill sites, and Objective CS06 to establish a database of strategic brownfield and infill sites will be helpful in terms of monitoring progress and focusing proactive measures to activate development of these underutilised sites within the city.

Moreover, the Office welcomes the coherent strategy for the sustainable neighbourhoods as presented in Chapter 5 of the Development Plan, which sets out a framework and vision for appropriate housing densities in a compact urban form. The strategy supports the provision of affordable, accessible, quality and sustainable community infrastructure, and which will contribute to the making of good, connected neighbourhoods. This approach reflects national and regional policies supporting increased city living and compact forms of development.

The Office also welcomes the inclusion of ambitious targets to encourage and facilitate more trips on foot and by bicycle, reducing the reliance on the private car and facilitating carbon neutral transport methods. The inclusion of modal share targets for 2028 and the proposals to implement and monitor sustainable travel to actively deliver significant modal shift from private car transport to greener and sustainable modes of travel is commended. The commitment to review the *Dublin City Centre Transport Study (2016)* in the lifetime of the Development Plan is also welcomed.

The Office also commends the range of policies and objectives in the Development Plan which support the overarching strategic approach to develop a low carbon, sustainable, climate resilient city, which provide a positive framework for addressing the needs of climate change and in particular the promotion of sustainable settlement and transportation strategies under section 10(2)(n) of the Act. This demonstrates your planning authority's clear commitment to the national *Climate Action Plan 2023*.

The amendment to the Development Plan in respect of Recommendation 4 of the Office's submission to the draft Plan is welcomed. The omission of Z16 Land Use Zoning objective provides clarity in relation to social and affordable housing delivery and is consistent with the statutory provisions set out in the Act.

While the Office held concerns during the Development Plan's consultation period regarding the Development Plan's approach in relation to Build-to Rent (BTR), the Office notes the subsequent publication of a Ministerial Circular (*Circular Letter: NRUP 07/2022*), pursuant to section 28(4) of the Act, which removes Specific Planning Policy Requirements 7 and 8 of the *Sustainable Urban Housing – Design Standards for New Apartment Guidelines (2020)*. As your planning authority will be aware, the effect of this amendment is that BTR is no longer a distinct class of development for planning purposes. Arising from the amendment, planning standards for BTR are required to be the same as those for all other generally permissible types.

The Office is satisfied with the overall outcome of the adopted Development Plan and the manner in which the vast majority of its recommendations and observations were addressed at the draft and material alterations stages of the Development Plan.

In conclusion, the Office welcomes the adoption of the Dublin City Development Plan 2022 – 2028 and looks forward to continued engagement with Dublin City Council in the implementation of national and regional policy at the local level.

Is mise le meas,

---

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end of the name.

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

---