

Proposed Variation to the City Development Plan 2016 – 2022 to incorporate the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES).

# **Executive Summary**

#### **Introduction & Purpose of the Variation**

Following the publication of the National Planning Framework (NPF) and the making of the Regional Spatial & Economic Strategy (RSES) by the Eastern & Midland Regional Assembly (EMRA) there is now a legal obligation on Dublin City Council to respond to the policies outlined in both documents and incorporate these in the City Development Plan, or if necessary, commence an early review of the Development Plan process. This incorporation must take place within six months of the publication of the RSES (June 2019). Following consideration of the content of the NPF and the RSES relevant to Dublin City Council Development Plan, and the fact that the City Plan already espouses many of the sustainable development policies contained within these new documents, it is concluded that the extent of changes required to the City Development Plan are small in scale and can be addressed by way of a variation process.

# **Key Changes Required**

The changes proposed for this variation fall into three groups, which are summarised as follows:

- (i) Changes to incorporate a summary of the NPF and RSES, update various references through the City Development Plan from the earlier National Spatial Strategy (NSS) and the Regional Planning Guidelines (RPGs) to these new documents. Reference is made to the new Office of the Planning Regulator and the Regulators statutory function.
- (ii) Update the population target figures within the Core Strategy (Chapter 2) of the City Development Plan (CDP), and the related housing target figures to reflect what is set out for the City by the RSES. The new RSES population target for the City, when adjusted to 2022, is 43,878 (low) to 52,878 (high). The current figure for this period in the CDP is 50,604. When averaged per year this is 7,313 (low) to 8,813 (high). The current Core Strategy annual figure is 8,434 per year. Thus the proposed revised population target figures have no significant impact for the City Development Plan.

The housing figures are similarly adjusted to reflect the new population figures, using the same process as was applied to the CDP; adjusting at a minor level the housing target for the City to reflect the RSES and NPF. The current housing target for the Plan is 29,500 (over 7 years), the proposed variation range is 21,939 - 26,439. When viewed as an annual

figure, this equates to 4,215 p.a. under the current 2016 City Plan, and a range of 3,656 – 4,400 p.a. under the RSES. The current figure falls within the range of the RSES, so therefore there are no policy implications to the Core Strategy or Housing Strategy. The Core Strategy in the current plan identifies a capacity to accommodate housing growth of in excess of 55,000 dwellings. The impact therefore of the revisions from the RSES and NPF does not require a revisiting of the Core Strategy.

(iii) Changes to include new Climate Change objectives from the RSES and the Dublin Metropolitan Spatial Plan (MASP, contained in Chapter 5 of the RSES). The changes proposed include referencing the Dublin Climate Change Action Plan 2019 and the commitment of the City Council to implement this; objectives to promote energy efficiency in buildings, to contribute to sustainable energy solutions and mapping energy zones; and to require provision of EV charging points in all major developments.

#### **Preamble**

This report sets out the changes proposed to the current 2016-2022 City Development Plan as a result of the making of the Regional Spatial & Economic Strategy for the Dublin & Eastern Regional Assembly area.

The report firstly outlines in section 1 the reasons for bringing forward the variation.

Section 2 outlines the key policy issues arising for Dublin from the National Planning Framework and the Regional Spatial & Economic Strategy.

Section 3 assesses the implications of both documents for the relevant chapters of the City Development plan. Each relevant chapter is named; a summary given of the key aspects of the NDP & RSES and the changes necessary; followed by the detail of the proposed variation for that chapter.

This variation is proposed within the context of the commencement of upcoming review of the City Development Plan by quarter 3 2020. The review of the City Development Plan will address the longer term objectives and policies of both the NPF and the RSES within a wider review process; and only those elements considered immediately necessary or legally required are proposed at this stage.

Any minor typographical errors found subsequent to preparing this report will be amended in the variation for public display.

#### 1. Purpose of the Variation

The purpose of this Variation is to incorporate the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES) into the City Development Plan 2016 – 2022, in accordance with Section 11 (1) (b) (iii) of the Planning and Development Act, 2000, as amended.

The National Planning Framework (NPF) (Project Ireland 2040) was published in 2018. This document sets out both the national strategic outcomes (NSO's) and national policy objectives (NPO's) for the future growth and sustainable development of the country to 2040.

The NPF is to be implemented at the regional level through the Regional Spatial and Economic Strategy (RSES). In accordance with Section 11 (1) (b) of the Planning and Development Act, 2000, as amended, the NPF and the RSES are to be incorporated, at the local level, into development plans. This is in order to align national, regional and local policy objectives. Section 11 (1) (b) (iii) of the P & D 2000 Act, gives a 26 week period after the making of the RSES, in which the commencement of a review of a development plan or a variation to a development plan, whichever is relevant, must be triggered in order to incorporate these documents into the Development Plan.

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region has been approved by the Members of the Eastern and Midlands Regional Assembly on 28 June 2019. As the formal review of the Dublin City Development Plan 2016 - 2022 is not due to commence until late 2020, the appropriate method of incorporating the NPF and the RSES into the development plan is by a variation to the development plan. This variation must be triggered before the 10<sup>th</sup> January 2020. It is the preference of the Chief Executive that the process is commenced prior to the deadline to reduce the risk of overlap and resultant confusion between the variation and the development plan review process itself.

#### 2. National and Regional Planning Frameworks

# 2.1 National Planning Framework (NPF) (Project Ireland 2040)

The NPF sets out both the national strategic outcomes (NSO's) and national policy objectives (NPO's) for the future growth and sustainable development of the country to 2040. There is a major new policy emphasis on compact growth and urban consolidation. This is to prevent urban sprawl and to secure the provision of housing, jobs, amenities and services within our cities (National Strategic Outcome No. 1). The NPF sets a target that half (50%) of future population and employment growth will be focused in the Country's cities and suburbs (National Policy Objective 2a).

As the country's leading global city of scale the NPF acknowledges the critical role that Dublin City plays in the county's competitiveness. It therefore supports Dublin's growth (jobs and population) and anticipates the city and suburbs to accommodate an extra 235,000 / 293,000 people by 2040.

To support and manage Dublin's growth, the NPF is seeking that the city needs to accommodate a greater proportion of the growth it generates within its footprint than was the case heretofore and that housing choice, transport mobility and quality of life are key issues in the future growth of the city. The NPF therefore sets a target of at least 50% of all new homes targeted for Dublin City and suburbs are delivered within its existing built-up footprints (NPO 3b).

To achieve these targets of compact growth and urban consolidation, the NPF identifies as key, the reusing of large and small 'brownfield' land, / infill sites, and underutilized lands at locations that are well served by existing and planned public transport. The NPF particularly highlights the need to focus on underutilised lands within the canals and the M50 ring. The benefits of such an approach for Dublin city are manifold and include: the potential to achieve more home and jobs in the city through high quality and high density mixed use development; continued support of existing services and infrastructure and facilitating people to live, work and recreate within a reasonable distance. Such an approach also facilitates the transition to a low carbon future.

To achieve these objectives the NPF sets out the following **Key Future Growth Enablers** for **Dublin**:

- Identifying a number of ambitious large scale regeneration areas for the provision of new housing and employment throughout the city and metropolitan area and the measures required to facilitate them as integrated, sustainable development projects;
- Determining a limited number of accessible locations for significant people intensive employment to complement the city centre and docklands area.
- Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally;
- Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro Link, DART expansion and the Luas green line link to Metro Link;
- The development of an improved bus based system, with better orbital connectivity and integration with other transport networks;
- Delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal river and coastal corridors;
- Facilitating the growth of Dublin Port through greater efficiency, limited expansion into Dublin Harbour and improved road access, particularly to / from the southern port area.

The strategic objectives of the NPF are aligned and underpinned by a new 10 year National Development Plan (NDP) which sets the framework for national capital investment to 2027. Additionally an *Urban Regeneration and Development Fund* has been put in place to support the objectives of the National Planning Framework for urban areas such as Dublin.

The NPF is to be implemented through the Regional Spatial and Economic Strategy which in turn sets the parameters for the City Development Plan.

### 2.2 EMRA Regional Spatial and Economic Strategy (incl. Dublin MASP)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Area (EMRA) translates the National Planning Framework objectives to the regional level. It sets out the vision for growth (homes and jobs) and Regional Policy Objectives (RPO) for the Eastern and Midland Region to the year 2031. Challenges identified for the Region include:

- the need to align population growth and the location of homes and jobs,
- the need to create healthy attractive places,
- the need to transition to a low carbon society, and,
- the challenge of sustaining economic growth.

Consequently, the RSES Strategy is underpinned by 3 Key Principles: (1) Healthy Placemaking, (2) Climate Action and (3) Economic Opportunity and these Key Principles permeate the Regional Strategy.

The growth and settlement strategy of the RSES reflects the compact growth / urban consolidation objectives of the NPF. It seeks an increase in population of circa 100,000 people by 2031 in Dublin City Council's administrative area. The RSES includes a more detailed 'Dublin Metropolitan Area Strategic Plan' (MASP) which identifies strategic development and employment areas for population and employment growth. Growth is also to be accommodated through the consolidation and re-intensification of infill, brownfield and underutilised lands within Dublin City and its suburbs.

# 3. Assessment of Development Plan Consistency with the National Planning Framework (Project Ireland 2040) and the EMRA Regional Spatial and Economic Strategy (RSES)

This section of the report outlines the changes required to the City Development Plan (Core Strategy and policies and objectives) to render it consistent with the Objectives of the National Planning Framework as expressed and implemented through the EMRA Regional Spatial Economic Strategy. Reference is also made to the new Office of the Planning Regulator and the Regulators statutory function.

This section examines the relevant parts of the City Development Plan, on a Chapter by Chapter basis, and for each:

- a) the relevant part of the NPF / RSES to be addressed is summarised,
- b) the implications for the CDP are assessed and recommendation(s) made, and,
- where appropriate, a variation is recommended to ensure compliance; changes are denoted as follows: the 'Struck-through' text is to be omitted and proposed changes are shown by Red Text.

#### 3.0 Assessment of Consistency

# 3.1 Chapter 1 of the City Development Plan – Strategic Context for the City Development Plan 2016 – 2022

The text of this chapter needs to be updated to reference the fact that the National Development Plan, National Spatial Strategy (2002–2020) (NSS), Regional Planning Guidelines for the Greater Dublin Area (2010–2022) (RPG's) have been superseded by the Project Ireland 2040 including the National Planning Framework 2040 (NPF), and also the Regional Spatial and Economic Strategy 2019 -2031.

The Office of the Planning Regulator (OPR) was established in April 2019. The Office's statutory function includes the assessment of statutory land use plans with a particular focus on Climate Action; the carrying out of reviews and examinations of local authority and Bord Pleanála systems and procedures; conducting educational training and research – in terms of what constitutes proper planning and sustainable development. The OPR will also be responsible for monitoring implementation of the NPF.

#### (b) Implications for Chapter 1 of City Development Plan

Chapter 1 of the Development Plan should be updated to reference the NPF and the RSES and the establishment of the OPR.

#### (c) Proposed Variation

# <u>Insert the Following Text in Section 1.3: Statutory Context, After the First Sentence of the Second Paragraph.</u>

The National Development Plan, National Spatial Strategy (2002–2020) (NSS), Regional Planning Guidelines for the Greater Dublin Area (2010–2022) (RPG's) have been

superseded by the Project Ireland 2040 including the National Planning Framework 2040 (NPF), and also the Regional Spatial and Economic Strategy 2019 -2031.

# <u>Insert the following Text in Section 1.3: Statutory Context, as a Last Paragraph.</u>

The Office of the Planning Regulator (OPR) was established in April 2019. The Office's statutory function includes the assessment of statutory land use plans with a particular focus on Climate Action; the carrying out of reviews and examinations of local authority and Bord Pleanála systems and procedures; conducting educational training and research – in terms of what constitutes proper planning and sustainable development. The OPR is also responsible for monitoring implementation of the NPF.

# 3.2 Chapter 2 of the City Development Plan - Vision and Core Strategy

### (a) Relevant Aspects of RSES & MASP

Assessing the changes needed to this central defining chapter of the Development Plan, the relevant RSES Chapters are reviewed and synopsised below: Chapter 3 Growth Strategy, Chapter 4 People and Place and Chapter 5 Dublin Metropolitan Area Strategic Plan (MASP).

The RSES places Dublin City and suburbs at the top of the settlement hierarchy for the Region. It identifies the city as an international city / a global gateway and the business core of the region / state. To this end the RSES seeks to sustain its economic growth and competitiveness. It also seeks continued sustainable and consolidated population and employment growth in the city with a focus on improving housing supply, amenity provision and improved public transport and sustainable travel options. The RSES identifies the following Growth Enablers for the City and Metropolitan Area.

Growth Enablers for the City and Metropolitan Area:

- Achieving growth to 1.4m people in Dublin City and Suburbs,
- To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin City and suburbs.
- To deliver strategic development areas identified in the MASP,
- Increase employment in strategic locations,
- Promote active land management and achieve compact growth targets through the development of infill, brownfield and public lands,
- Protect and improve access to Dublin Airport and Port, and improve accessibility and service by rail and road on the Dublin – Belfast Corridor.

MASP identifies the following Guiding Principles for the growth of Dublin Metropolitan Area.

Guiding Principles for the growth of Dublin Metropolitan Area:

 To focus development along existing and proposed high quality public transport corridors and nodes.

- Increase employment density within Dublin City and suburbs at sustainable locations,
- Alignment of growth with enabling infrastructure,
- To realise opportunities for social as well as physical regeneration,
- Identify future development areas,
- Enhance provision of regional parks and strategic green infrastructure,
- Co-ordination and active land management.

Dublin City and Suburbs is expected to accommodate an extra 220,000 population by 2031 (NPF and RSES) and this includes a growth in population of c. 100,000 persons in Dublin City Council's administrative area.

The RSES seeks to deliver the city's growth through the *Dublin Metropolitian Area Strategic Plan* (MASP). The RSES sets population targets in Dublin City's administrative area in the Short and Medium Terms as follows:

- To 2026 (Short Term)
  - 613,000 (low) 625,000 (high), an increase of some 58,500 (low) 70,500 (High) people from 2016 (2016 Census).
- To 2031 (Medium Term)
  - 638,500 (low) 655,000 (high) for 2031 (medium term), an increase of some 25,500 (low) 30,000 (high) from 2026 to 2031.

In the case of DCC, the capacity to meet these targets is to be via the development of strategic development areas identified in MASP (Table 5.1); the ongoing provision of development on brownfield, infill, and underutilised lands and through the reduction in vacancy. To help Council's to meet these targets, the RSES sets out guiding principles for infill and brownfield development (Chapter 3 Growth Strategy), which includes the creation of a brownfield database at the local level. RPO 3.3 seeks that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop the lands.

The following Strategic Development Areas and Strategic Employment Lands are located in DCC's area:

### Strategic Development Areas:

Multi-Modal Location - City Centre within the M50

<u>Residential</u>: Docklands and City Centre, Naas Road, north east inner city lands, Parkwest – Cherry Orchard, Ballymun, Ashtown-Pelletstown and St James – Heuston Lands.

<u>Employment</u>: Docklands and Poolbeg, Diageo lands and St James and Grangegorman campus, Naas Road

• DART Corridor - (North South)

<u>Residential</u>: North Fringe (Clongriffin / Belmayne) <u>Employment</u>: North Fringe Mixed Use Centres

#### Strategic Employment Lands:

- Multi-Modal Location City Centre and Docklands
  - Docklands, Poolbeg and North East Inner City, City Centre (Grangegorman and St James-Diageo lands)
  - Intensification of Industrial lands

#### • DART Corridor - (South West Corridor)

Naas Road

The MASP recognises that sites, including strategic sites, other than those outlined in the Plan, will come forward during the lifetime of the MASP through the ongoing provision of brownfield / infill intensification development.

MASP states that core strategies should demonstrate consistency with the population targets expressed in the NPF and the Implementation Roadmap for the National Planning Framework July 2018.

#### (b) Implications for Chapter 2 of City Development Plan

In order to demonstrate consistency with the population growth targets expressed in the NPF and the RSES (including the 'Implementation Roadmap for the National Planning Framework July 2018), the Population and Housing Figures as set out in Table A of the Core Strategy of the 2016 – 2022 City Development Plan must be amended. The implications of the new population growth targets for the City on the Core Strategy of the City Development Plan is set out below. The proposed revised figures are similar to that contained within the existing Core Strategy, and for that reason the implications overall are minimal, and the adjustment, while required by legislation, is to all purposes a technical amendment.

It is considered that the Vision and Core Strategy of the City Development Plan 2016 – 2022 is wholly consistent with National Planning Framework Policy and with the RPO's of the Regional Spatial and Economic Strategy.

# Population Growth:

The City Development Plan Core Strategy (2016 - 2022), in accordance with the Regional Planning Guidelines (2010 - 2022) provides capacity for an additional population in excess of **59,000** during the plan period from 2015 to 2022 (see Table A of current Plan). This equates to an average annual population growth equivalent of **8,434** persons.

Between 2016 and 2026, the RSES identifies a population increase of between 58,500 persons (low) and 70,500 persons (high). After applying a Headroom of 25% of the targeted growth to 2026 (as per the NPF Roadmap), an average annual equivalent population growth of **7,313 (low) – 8,813 (high)** can be ascertained. The annual equivalent population growth of **7,313 (low)** to 8,813 (high) is comparable with the figure of 8,434 as set out in the current City Development Plan Core Strategy.

#### Housing Allocation:

The current City Development Plan has a target of housing provision for 29,500 units (over a seven year period). This figure averages as 4,215 units per year<sup>1</sup>, based on a continuing trend downwards to an occupancy level of 2 persons per household. The revised figures from the RSES change this figure to a range of 21,939 - 26,439 dwellings, an annual target of 3,656 - 4,400 per year, (plus 3,000 additional social housing units).

<sup>&</sup>lt;sup>1</sup> This figure is divided by 7 to align with the RPG dates.

As the range of housing required by the RSES falls very close to the current City Development Plan figures there are no changes required to the City Core Strategy. The current zoning policies and Core Strategy has identified a housing capacity of in excess of 55,000 for the City; which, taking into account the complexity of development within the City area, is adequate to meet the housing targets set. It is considered therefore that the City Development Plan remains consistent with national and regional policy.

The RSES and the NPF highlight that the recent history of the collapse of the construction industry following the economic crisis has had a long and significant impact on housing construction. This impact has resulted in low levels of construction activity through the first few years of the current Development Plan.

Recent trends point to a rising and significant increase in housing construction over the past 2 years. However, to address the remaining lag in housing output in the city and in recognition of the continuing high demand for housing and the need to ensure the implementation of infill / brownfield targets set out in MASP, the revised housing allocation figures to the year 2022, as set out above (21,939 - 26,439 dwellings, an annual target of 3,656 - 4,400 per year) include the application of Headroom at 25% as per the Implementation Roadmap for the National Planning Framework' 2018.

The upcoming review of the current City Development Plan will further address this lag of housing targets within the longer time frame targets set by the RSES and take into account the results from the 2016 and, if possible, the forthcoming 2021 Census.

# (c) Proposed Variation

# Remove the following sentence from Section 2.2 The Core Strategy and Replace with Revised Text

In particular, the National Spatial Strategy 2002 – 2020 (NSS), the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 (RPGs)...

In particular, the National Planning Framework 2040 (NPF), the Regional Spatial and Economic Strategy 2019 -2031...

#### Remove Title of Paragraph 2.2.1 and Replace with Revised Title:

Development Plan Consistency with the National Spatial Strategy (NSS) and the Regional Planning Guidelines (RPGs)

Development Plan Consistency with the National Planning Framework (Project Ireland 2040) and the EMRA Regional Spatial and Economic Strategy (RSES)

# <u>Insert the Following Text after Current First Paragraph of Regional Planning Guidelines in Section 2.2.1</u>

The National Planning Framework (NPF) (Project Ireland 2040) was made in 2018 and this replaces the National Spatial Strategy (NSS). The Regional Planning Guidelines have been superseded by the Regional Spatial and Economic Strategy (RSES) which was made by the Eastern & Midland Regional Assembly on 28<sup>th</sup> June 2019.

### National Planning Framework (NPF) (Project Ireland 2040)

The NPF sets out the strategic planning framework for the future development of the country to 2040. As the country's leading global city of scale the NPF acknowledges the critical role

that Dublin City plays in the country's competitiveness. It therefore supports Dublin's growth (jobs and population) and anticipates the city and suburbs to accommodate an extra 235,000 - 293,000 people by 2040. To support and manage Dublin's growth, the NPF is seeking that the city needs to accommodate a greater proportion of the growth it generates within its footprint than was the case heretofore and that housing choice, transport mobility and quality of life are key issues in the future growth of the city. The NPF therefore sets a target of at least 50% of all new homes targeted for Dublin City and suburbs are delivered within its existing built-up footprints.

To achieve these targets of compact growth and urban consolidation, the NPF identifies as key, the reusing of large and small 'brownfield' land, / infill sites, and underutilised lands at locations that are well served by existing and planned public transport for housing and people intensive employment purposes. The NPF particularly highlights the need to focus on underutilised lands within the canals and the M50 ring and the relocating of less intensive uses outside the M50 ring and the existing built up area generally. The benefits of such an approach for Dublin city are manifold and include: the potential to achieve more home and jobs in the city through high quality and high density mixed use development; continued support of existing services and infrastructure and facilitating people to live, work and recreate within a reasonable distance. Such an approach also facilitates the transition to a low carbon future. The core strategy, by providing capacity for an additional population in excess of 55,000 during the plan period, and with a mix of dedicated employment-zoned, mixed use and regeneration lands catering for employment uses within sustainable mixed use quarters, accords with the NPF.

The strategic objectives of the NPF are aligned and underpinned by a new 10 year National Development Plan (NDP) which sets the framework for national capital investment to 2027. Additionally an *Urban Regeneration and Development Fund* has been put in place to support the objectives of the National Planning Framework for urban areas such as Dublin.

The NPF is to be implemented through the Regional Spatial and Economic Strategy which sets the parameters for the City Development Plan.

### Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area (RSES) translates the National Planning Framework objectives to the regional level. It sets out the vision for growth (homes and jobs) and Regional Policy Objectives (RPO) for the Eastern and Midland Region (9 counties). The growth and settlement strategy of the RSES reflects the compact growth / urban consolidation objectives of the NPF; in that it seeks the consolidation and re-intensification of infill, brownfield and underutilised lands with Dublin City and its suburbs with 50% of all new homes targeted for Dublin and its suburbs to be located in the existing built up area in tandem with the delivery of key infrastructure to achieve, in Dublin City Council's administrative area, an increase in population of circa 100,000 people by 2031.

# **Dublin Metropolitan Area Strategic Plan (MASP)**

A more detailed planning and investment framework for the Dublin Metropolitan Area is set out in the Dublin *Metropolitan Area Strategic Plan (MASP)*, which forms part of the RSES. To support Dublin's sustainable growth and continued competitiveness MASP identifies a number of large scale strategic sites (strategic development lands), based on key corridors that will deliver significant development (housing and employment development) up to the year 2031.

The strategic development lands within the City Council's area include Dublin Docklands, Poolbeg West and the potential of brownfield lands in the Naas Road area straddling the DCC and South Dublin County Council's administrative areas. It identifies the Docklands and large industrial and other strategic land banks along major transport corridors within the city as Strategic Employment locations and seeks the intensification of all employment lands within the M50.

The MASP recognises that strategic sites, other than those outlined in the Plan, will come forward during the lifetime of the MASP through the ongoing development and intensification of brownfield and infill opportunities.

# <u>Insert Figure (and Figure Title) from Dublin Metropolitan Area Strategic Plan – Figure 5.2 at end of Section on Dublin Metropolitan Area Strategic Plan (MASP)</u>



Fig. 2a Dublin Metropolitan Area Strategic Plan

# Insert Table A 'Updated' After Existing Table A

Table A 'Updated' – Population Figures based on Census Data 2016, Estimate for 2019 and NPF & RSES Allocations.

	Α	В	С	D	Е	F	G
	2016 CSO Census figure	figure estimated from CSO Dublin Estimate*	2019 - 2026 RSES Allocation	Population growth 2016 – 2026 to meet RSES allocation (Column C minus Column A	Application of Headroom at 25% targeted growth to 2026 (NPF Roadmap)	Annual Pop Growth 2016 - 2026 (Column E divided by 10 years)	2016 – 2022 planned population growth using RSES figure and annual figure Column F
Population	554,50 0	573,592	613,000 (low) – 625,000 (high)	58,500 (low) - 70,500 (high)	73,125 (low) – 88,125 (high)	Average annual equivalent = 7,313 (low) - 8,813 (high)	43,878 (low) - 52,878 (high)
Housing Allocation							Housing requirement for 2016 to 2022 assuming 2 occupants per unit = 21,939 (low) to 26,439 (high)

<sup>\*</sup>The 2019 figure (Column B) has been estimated from the 2019 CSO estimate for Dublin (County), i.e. 1,395,600. It is assumed to be 41.1% of same (it comprised 41.1% in 2016, 41.4% in 2011 and 42.6% in 2006).

# For information purposes the existing Table A is shown below-

Table A – Population and Housing Figures Based on Census Data 2011, Estimate for 2013, and RPG Allocations.

	A	B	C	Đ	E	F
	2011 CSO Census figure	2013 figure estimated from CSO regional figure*	2016 RPGs allocation	2022 RPG allocation	Population growth 2013-2022 to meet RPG allocation (i.e. column 'D' minus 'B')	Planned population growth 2015-2022 , based on RPG figure (using average annual figure in column 'E')
Population	<del>527,612</del>	<del>530,208*</del>	<del>563,512</del>	606,110	75,902 Average annual equivalent = 8434	59,038
Housing Allocation	-	-	<del>265,519</del>	319,903		Housing requirement for the plan period based on the above figure - assuming 2 occupants per residential unit = 29,500 units

<sup>\*</sup>The 2013 figure has been estimated from the CSO estimate for the Dublin region, i.e. 1,262,400. It is assumed to be 42% of same (it comprised 42.6% in 2006 and 41.4% in 2011)

# Omit Paragraph after Existing Table A and replace with the following:

Based on the currently available Regional Planning Guidelines 2010–2022, the 2011 Census, and population projections published by the CSO in 2013, this development plan works to a projected population increase of almost 60,000 persons by 2022 see Table A below. Assuming an average occupancy rate of two persons per residential unit, the housing requirement is 29,500 units approximately. It is, therefore, planned to provide capacity to exceed this figure in the housing strategy for the development plan period 2016–2022, in order to accommodate longer-term sustainable growth.

Based on the current Regional Spatial and Economic Strategy 2031, the 2016 Census, and, the NPF Implementation Roadmap for the National Planning Framework 2018, this Development Plan works to a projected population increase of between c.44,000 - 52,000 persons in the 2016 – 2022 plan period - see Table A Updated. Assuming an average occupancy rate of two persons per residential unit, the housing requirement for the 2016 – 2022 period is between c.21,000 – 26,500 units over a 6 year period. The Development Plan provides capacity to exceed this figure in the Housing Strategy for the Development Plan period 2016–2022, in order to accommodate longer-term sustainable growth.

From the above analysis, and particularly because there is capacity in excess of the required population and housing figures (see housing strategy below), it is concluded that the policies and objectives of this Dublin City Development Plan remains consistent the high-level national and regional policies.

# Alter the First and Second Sentences of Paragraph 1 of Section 2.2.3 Settlement Strategy as following:

Dublin city in its entirety lies within the metropolitan Dublin Metropolitan Area Strategic Plan (MASP) area and the RPGs RSES's give direction to Dublin city as the 'gateway core' the 'global gateway' for high-intensity clusters, brownfield development, urban renewal and regeneration. The RPG RSES settlement strategy for the metropolitan area includes a strong policy emphasis on the need to gain maximum benefit from existing assets, such as public transport and social infrastructure, through the continuation of consolidation and increasing densities within the existing built footprint of the city.

# 3.3 Chapter 3 of the City Development Plan- Addressing Climate Change

#### (a) Relevant Aspects of RSES & MASP

Climate Change is a global challenge requiring responses at national, regional and local level. Changes already evident in sea level, temperatures, precipitation patterns and weather extremes and are set to continue with environmental, social and economic impacts. Currently the highest level of emissions in the region occur in Dublin City and its suburbs and along with the main transportation routes.

National and Regional policy seeks to reduce greenhouse gas emissions (e.g. carbon dioxide), replace fossil fuels and enhance carbon sinks (bogs and woodland). A key element of the Strategy is the need to achieve and monitor progress towards, achieving a low carbon circular economy and climate resilient society.

The RSES identifies that the main emission sources are the energy, built environment, transport and agricultural sectors. The policy objectives of the RSES therefore are concerned with:

- minimising energy demand and waste and concentrating on renewable energy and secondary/ waste heat sources (RPO's 7.35 & 7.38)
- provision / operation of low energy buildings through construction and refurbishment (RPO 7.40), and,
- integrating land use and transporting planning in order to reduce the need to travel by car and the provision of EV infrastructure (RPO 7.42).

These RPO's are set out below:

**RPO:7.35** EMRA shall in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy would be developed to support delivery of projets within the Strategic Energy Zones.

**RPO 7.38**: Local authorities shall consider the use of heat mapping to support development which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in local authority areas shall be carried out and statutory planning documents shall identify local waste heat sources.

**RPO:** 7.40 '......All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).

**RPO 7.42**: Local authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging facilities and prioritisation of parking for EVs in central locations.

#### EMRA & DHPLG & OPR Commitments

EMRA is to work closely with the Climate Action Regional Offices (CARO), which is run by the four Dublin local authorities and assisted by Codema.

EMRA has committed to carrying out regional emissions assessments of transport (RPO's 7.30 & 7.31) and a bio-economy feasibility study / bio-economy plan for the Region (RPO 7.34) & (RPO 7.37).

According to RPO 3.6 development plans are to undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets. The RSES states that the Department of Housing, Planning and Local Government (DHPLG) is currently developing guidelines for development plans and this is to include guidelines for the assessment of the impact of city and county development plan strategies on carbon reduction targets.

It is understood that the Office of the Planning Regulator (OPR) is currently developing a 'Climate Impact Assessment' methodology to quantify the climate impact of the strategies / policies / objectives of land use plans in terms of meeting carbon reduction targets. The application of such an evidence based measurement methodology to statutory plans would play an important role in securing a low carbon and climate resilient city and is to be supported.

### <u>Dublin City Council Climate Change Action Plan</u>

Dublin City Council adopted its Climate Change Action Plan in May 2019. This Action Plan has a focus on actions and targets. The implementation of the Climate Change Action Plan and development of Climate Action policies shall be undertaken in partnership with stakeholders including CARO and Codema.

#### (b) Implications for Chapter 3 of City Development Plan

The RPO's of the Environment and Climate Chapter of the RSES include Climate Action objectives seeking assessments and studies with a view to framing evidence based Climate Action policy in the future. The City Development Plan should be amended to reflect these requirements where appropriate.

It should be noted that in accordance with Section 10 (2) (n) of the P&D Act, 2000, the 2016-2022 City Council Development Plan includes objectives to reduce anthropogenic greenhouse gas emissions including by way of its settlement / core strategy. The development plan policies also underpin the creation of a compact city with mixed-use environments, sustainable neighbourhoods and green infrastructure, to reduce the city's reliance of fossil fuels and provide for carbon soakage, all in accordance with National Climate Action policy.

In order to demonstrate consistency with the NPF and the RSES the following changes to the 'Addressing Climate Change' Chapter of the 2016 – 2022 City Development Plan is set out below:

### (c) Proposed Variation

#### Alter Paragraph 3.2 Achievements by Adding the Following Bullet Point:

Dublin City Council adopted its Climate Change Action Plan in May 2019. This has a focus on actions and targets. The implementation of the Climate Change Action Plan and development of Climate Action policies shall be undertaken in partnership with stakeholders including the Climate Action Regional Office and Codema.

# **Insert Text as last Para of Section 3.3 Challenges:**

An evidence based measurement methodology to quantify the climate impact of the strategies / policies / objectives of land use plans in terms of meeting carbon reduction targets (climate mitigation) and climate change adaptation is to be forthcoming from the Office of the Planning Regulator (OPR).

# Remove Objective CCO1 and Replace with Following Objective CC01

CC01: To implement the 'National Climate Change Adaptation Framework' (2012) by adopting a Climate Change Action Plan for Dublin City which will assit towards meeting National and EU targets. This will be adopted by end of 2018.

CCO1: To implement Dublin City Council's Climate Change Action Plan (CCAP) in consultation and partnership with stakeholders including the Climate Action Regional Office (CARO) and Codema. Regard will be had to the range of actions listed across the 5 thematic areas of the CCAP including Flood Resilience, Transport, Energy & Buildings and Nature Based Solutions. The Climate Change Action Plan can be accessed at the following link:

https://www.dublincity.ie/sites/default/files/content/WaterWasteEnvironment/Waste/Documents/2019%20DCC%20Climate%20Change%20Action%20Plan.pdf

#### **Objective CC08 Insert Text as Follows**

In conjunction with Codema and CARO (Climate Action Regional Office), to complete a comprehensive spatial energy demand analysis to help align the future energy demands of the city with sustainable energy solutions. This will include identifying strategic energy zones in tandem with mapping waste heat sources.

# Policy CC3 Insert Text as follows

To promote energy efficiency, energy conservation and the increased use of renewable energy in existing and new developments. All new buildings will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).

# Objective CC015 Insert Text as follows

To facilitate the provision of electricity charging infrastructure for electric vehicles in all new development and in the public realm.

#### **Insert New Objective CC016:**

All new parking for new (or extensions to) housing, apartments and places of employment that provide car parking shall be electric charge enabled.

Dublin City Council shall work closely with the ESB and other stakeholders to increase the number of EV charge points across the city. All new (or upgraded) commercially operated car parking developments shall be required to provide a minimum of 50% of spaces with EV charging facilities.

# Section 3.5.3 Insert the following Text at the End of the Second Paragraph

New development should be avoided in areas at risk of coastal erosion to the greatest extent possible.

# 3.4. Chapter 4 Shape and Structure of the City

#### (a) Relevant Aspects of RSES & MASP

The RSES identifies Dublin City and Suburbs as an 'International Business Core with a strong diversified economic base with access to international markets. High density retail and service hub, with high quality arts, culture and leisure offer'.

The RSES seeks its continued growth and consolidation and it specifically seeks higher densities in the city. The RSES and MASP supports the consolidation and re-intensification of infill / brownfield sites to provide high density and people intensive uses within the existing built up areas of Dublin City and suburb.

### (b) Implications for Chapter 4 of City Development Plan

The CDP's Shape and Structure of the City Chapter is consistent with RSES objectives and only referencing text changes are required.

The specific issue of building height as per the guidance and *Specific Planning Policy Requirements* of the 'Urban Development and Building Heights Guidelines for Planning Authorities', December 2018 is currently being implemented through the development management process. An updated building height policy will form part of the Development Plan review.

#### (c) Proposed Variation

# Remove the following Text from Section 4.5.3.1 Urban Density (First and Second Paragraphs and Replace with Revised Text

The National Spatial Strategy 2002 - 2020

The National Planning Framework 2040 (NPF)

The Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022

The Regional Spatial and Economic Strategy 2019 -2031

#### 3.5 Chapter 5 Quality Housing

#### (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapter is reviewed and synopsised below: Chapter 9 Quality of Life

The RSES outlines the need for a significant increase in the delivery of housing in the State and this includes a national output of 30,000 to 35,000 homes per annum in the years to 2027 and then 25,000 annually up to 2040. This is to deal with the deficit that has built up since 2010. The slow growth of housing stock compared to rates of population growth and household formation has led to an increase in the average number of persons per household to 2.8 for the Region and 2.5 in Dublin City.

Urban consolidation / increased urban densities: Objectives include the need to work with the newly established Land Development Agency. The RSES also sets out the need to establish mechanisms to facilitate brownfield development, including the development of a

database of strategic brownfield and infill sites so that brownfield re-use can be actively managed and contaminated soil / waste can be adequately addressed. (RPO9.7, RPO 9.8 and RPO 9.9).

Housing need: The NPF (NPO37) requires that each local authority is to undertake a Housing Need Demand Assessment (HNDA) to provide a robust common evidence base to inform housing and land use zoning policies and development plans. In the case of Dublin this is to be a Regional NHDA (4 LA's). Guidance in relation to housing provision and data is to be forthcoming as part of new statutory guidelines on development plans by the Department of Housing, Planning and Local Government (DHPLG).

Housing typologies and tenure typologies: The RSES places an emphasis on affordable, appropriate, flexible and adaptable accommodation with a view to amongst other things to incentivise mobility in the housing market.

### (b) Implications for Chapter 5 of City Development Plan

Chapter 5 (Quality Housing) of the 2016 - 2022 is to be amended to reflect population growth targets and housing allocation on foot of the population growth targets expressed in the NPF and the RSES (including the 'Implementation Roadmap for the National Planning Framework July 2018).

#### (c) Proposed Variation

### Insert in Section 5.3 Challenges, the Following Sentence at the End of Para.2

Under the Regional Spatial and Economic Strategy 2019 - 2031 the population of Dublin City has a target to increase by between c. 58,500 - 70,500 persons over 10 years to 2026. This Plan and the subsequent City Development Plan will ensure that the Core Strategy makes provision to meet this medium term target.

# Replace Title of Section 5.5.1 National and Regional Guidelines and the Housing Strategy with the following:

National and Regional Guidelines and the Housing Strategy

National Planning Framework, Regional Strategy and the Housing Strategy

#### Replace Para. 2 of Section 5.5.1 with the Following Text as follows:

The Regional Planning Guidelines for the Greater Dublin Area (2010–2022) provide a settlement hierarchy for the region and housing allocations for relevant local authorities. The Dublin Regional Authority has been replaced by the Eastern and Midlands Regional Assembly which will be responsible for the formulation of a new Regional Spatial and Economic Strategy to replace the existing Regional Planning Guidelines. The timeframe for commencement of the Regional Spatial and Economic Strategy will not coincide with the review of the development plan. Therefore, the development plan has been informed by the provisions of the existing regional planning guidelines complemented by an analysis of current data trends including the CSO regional projections.

The Regional Spatial and Economic Strategy 2019 – 2031 for the Eastern and Midlands Region Assembly provides a settlement hierarchy for the region and population projections for relevant local authorities.

### Section 5.5.1 Insert the Following as a New Para. 4.

Guidance in relation to housing provision and data (Housing Need Demand Assessment) is to be forthcoming as part of new statutory guidelines on development plans and the review of development plans by the Department of Housing, Planning and Local Government (DHPLG).

# 3.6 Chapter 6 City Economy and Enterprise

# (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapters are reviewed and synopsised below: Chapter 6 Economy and Employment, Chapter 5 Metropolitan Area Strategic Plan (MASP), Chapter 4 People and Places.

One of the 3 key principles of the RSES is 'Economic Opportunity' - To create the right conditions and opportunities for the region to realise sustained economic growth and employment that ensures good living standards for all.

The Eastern and Midland Regional Assembly area, with Dublin City and its suburbs at its core, drives the national economy. The Region is to accommodate an additional 320,000 workers up to 2031. The imperative is therefore to support Dublin City's' role as a driver of growth and to manage its growth while increasing its critical mass. It is also imperative to support and facilitate the continued growth of Dublin Airport and Dublin Port and to protect and improve existing access.

The RSES recognises the importance of locating employment opportunity / enterprise in the right places: in large urban centres, near where people live, in high density development at highly assessible locations, adjacent existing enterprise centres / third level institutions etc.

The RSES seeks to locate / increase employment in strategic locations and to re-intensify employment development within the M50. Less intensive employment uses are to be relocated outside the M50 ring and existing built up areas in order to free up land in the urban areas. MASP identifies the following strategic employment locations in DCC's administrative area:

- <u>Multi-Modal Location</u> City Centre and Docklands
  - Docklands, Poolbeg and North East Inner City, City Centre (Grangegorman and St James-Diageo lands)
  - Industrial lands
- DART Corridor (South West Corridor)
  - Naas Road
- Dublin / Belfast Corridor

The RSES seeks to sustain the city's existing strong and diversified economic base / sectors, which includes, services (including retail), medical, financial services / technology, digital industry, tourism etc and it seeks to facilitate the transformation of enterprise for longer term resilience. It promotes smart specialisation strategies based on identified

strengths combined with cluster policies that promote network effects etc. It identifies drivers for growth, including 'skills & talent, innovation, infrastructure, trade and enterprise and entrepreneurial ecosystems' and seeks to support and promote their development.

Finally, in terms of healthy placemaking and as part of realising sustained economic growth and employment, the RSES seeks the integration of better urban design, public realm, amenities and heritage to create attractive places to live, work, visit and invest in.

# (b) Implications for Chapter 6 of City Development Plan

The CDP's City Economy and Enterprise Chapter is consistent with these objectives.

#### 3.7 Chapter 7 Retailing

#### (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapter is reviewed and synopsised below: Chapter 6 Economy and Employment.

Retail is a significant employer and economic contributor in the Region / City. It enables strong mixed use commercial cores and facilitates regeneration. In order to update the retail hierarchy and to apply floorspace requirements for the Region, the EMRA is to drive the preparation of a new retail strategy for the Region under the requirements of the Retail Planning Guidelines for Planning Authorities 2012 (RPO 6.10).

Poolbeg has been identified as a Level 3 District Centre.

# (b) Implications for Chapter 7 of City Development Plan

The CDP's Retailing Chapter is consistent with the RSES and no changes to the Development Plan are required.

#### 3.8 Chapter 8 Movement and Transport

#### (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapters are reviewed and synopsised below: Chapter 8 Connectivity and Chapter 5 Metropolitan Area Strategic Plan (MASP).

The RSES sets out the challenges facing the region / city arising from the continuation of existing travel and settlement patterns. These include continued congestion, high private car usage, costs to the economy, negative health effects, increased carbon footprint, pollution / air quality issues and social disadvantage.

The RSES identifies that a well-functioning integrated public transport system will underpin the sustainable growth of the region and that it will aid in the transition to a low carbon economy by 2050. The RPO's seek integrated land use and transport planning, which includes the promotion of compact development and the locating of intensive uses at locations with access to high frequency public transport. This allows for opportunities for modal shift and / or reduces the need for travel (RPO's 8.1 to 8.3).

This chapter is also concerned with enhancing regional /international connectivity, including Dublin Airport and Port and the Dublin - Belfast Corridor, and enhanced green infrastructure provision.

The RSES seeks that land use plans shall demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area including Metro Link, DART expansion and the extension of Luas (RPO 8.4). The RSES also supports the development of an improved bus based system for the city which integrates with other transport networks and the delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal, river and coastal corridors.

## (b) Implications for Chapter 8 of City Development Plan

The CDP's movement and transport strategy is consistent with the RSES.

# (c) Proposed Variation

### Remove Fourth Bullet Point of Policy MTI and Replace with New Text

- Regional Planning Guidelines for the Greater Dublin Area
- Regional Spatial and Economic Strategy (RSES)

# 3.9 Chapter 9 Sustainable Environmental Infrastructure

#### (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapters are reviewed and synopsised below: Chapter 3 Growth Strategy, Chapter 10 Infrastructure, Chapter 7 Environment and Climate, Chapter 6 Economy & Employment, and Chapter 8 Connectivity.

The RSES states that high quality, secure and resilient services and infrastructure is required for the region in order to support its economy and in order to underpin social cohesion. The key drivers of the RSES in respect of services and infrastructure are environmental sustainability and climate action.

<u>Water Services / Wastewater / Waste</u>: It seeks the management and conserving of water resources; the delivery of strategic water services / wastewater treatment infrastructure investment; support for Irish Water's functions; the servicing of settlements in accordance RSES / Strategy / core strategies; and, the prevention of adverse impacts on Natura 2000 sites. In terms of Waste, Development Plans should identify material re-use and how waste is reduced and managed in line with the Eastern and Midlands Region Waste Management Plan.

<u>Urban Drainage / Flooding / Watercourses & Water Quality</u>: The RSES seeks the protection of water drainage infrastructure, sustainable urban drainage solutions to reduce the risk of flooding and systems which meets GDSDS requirements in respect to Climate Change and Water Framework Directive. The RSES seeks the implementation of the WFD and a catchment based approach to water quality. In terms of flooding and coastal erosion, it seeks: to minimise flood risk and coastal erosion, compliance with the Guidelines on the Planning System and Flood Risk Management, and the implementation of the CFRAM programme.

<u>Energy</u>: As demand is set to grow and in view of the need to meet climate reduction targets, Development Plans should facilitate the development of renewable energy sources, including energy extraction from waste and the provision of energy networks in principle.

<u>Air quality / Noise & Light Pollution</u>: The RSES seeks to reduce harmful emissions to air and to maintain good air quality for urban areas and to inform a regional air quality and GGE inventory. It seeks the preparation of strategic noise maps and action plans and measures to minimise light pollution. Policies of development plans shall recognise and reflect the airport noise zones associated with the airport.

<u>Soil remediation (Brownfield)</u>: The RSES sets out guiding principles for the development of brownfield and infill sites including the need for plans for dealing with hazardous or contaminated material.

<u>Telecommunications / Smart Cities</u>: The RSES seeks high quality digital networks including an ICT network the use of ICT in the management of the city.

### (b) Implications for Chapter 9 of City Development Plan

The CDP's Sustainable Environmental Infrastructure Chapter is consistent with the RSES.

#### 3.10 Chapter 10 Green Infrastructure, Open Space and Recreation

# (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapters are reviewed and synopsised below: Chapter 7 Environment and Climate and Chapter 9 Quality of Life.

The RSES sets out the need to conserve and enhance the biodiversity of the region, the need to protect and enhance Green Infrastructure and the need for open space and recreation areas for the city.

<u>Green Infrastructure (GI):</u> GI (linked green spaces) serves a wide variety of important functions including protecting wildlife, improving physical and mental health, reducing air pollution, mitigating floods, place-making and amenities and water treatment / retention. The RSES seeks the further development of GI and the coordination of the mapping of strategic GI at the regional level.

The RSES supports the development of National and Regional Greenways and Blueways. These include the Dublin – Galway Greenway, linking Canals with the River Shannon, and the development of the Dublin Docklands for water focussed amenity.

<u>Waterways and Coast:</u> The RSES seeks to provide riparian buffers along waterways. It also identifies the need to integrate land and marine planning pending the completion of National Maritime Spatial Plan.

Landscape: The RSES advocates the development of Landscape character assessments.

Recreation / Open Space: The RSES sets out guiding principles for delivery of recreational / open space facilities, seeking, inter-alia co-location of facilities, play policies to meet the needs of children and the development of multi-functional spaces. RPO's seek that communities be adequately served by a range of facilities including regional parks and that LA's work with relevant agencies / groups to deliver facilities and consider public health policy in development plans (RPO's 9.14 - 9.17).

Biodiversity / Dublin Bay Biosphere / Ecosystem Services: RPO's seek the implementation of the Habitats Directive and the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay Biosphere in cooperation with the Dublin Bay UNESCO Biosphere Partnership. Local Authorities are to promote an Ecosystem Services approach in the preparation of statutory land use plans (RPO 7.21).

### (b) Implications for Chapter 10 of City Development Plan

The CDP's Green Infrastructure, Open Space and Recreation Chapter is consistent with the RSES.

#### 3.11 Chapter 11 Built Heritage and Culture

#### (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapters are reviewed and synopsised below: Chapter 9 Quality of Life and Chapter 7 and Environment and Climate.

Culture, language, heritage (Archaeology / Architectural) are valued for their intrinsic value, their wider social import and for their economic potential in terms of creative industries and cultural tourism. RPO's 9.24 – 9.30 seek their protection and promotion / enhancement.

RPO 7.6 seeks policies in development plans for the protection and enhancement of ship wrecks and underwater cultural heritage.

### (b) Implications for Chapter 11 of City Development Plan

The CDP's Built Heritage and Culture Chapter is consistent with the RSES.

The City Development Plan inter alia, contains the following cultural policies:

Policy CHC 28: That Dublin City Council is committed to ensuring that there is a supply of workspaces for artists in the city. It is the policy of Dublin City Council to work with all private, public and cultural stakeholders in co-operation to ensure that artistic work space is a key element in all multiuse developments in the city, in particular ensuring there is provision for cultural and artistic space in developments.

Policy CHC 29: Dublin City Council will see insofar as possible to protect the cultural and artistic use of buildings in established cultural quarters.

Policy CHC 31: All large scale, mixed-use development (as defined by this development plan) of office or residential space will include cultural/artistic/community uses.

# (c) Proposed Variation

### Policy CHC31: Insert the Following Text at end of Policy CHC31

Proposals of over 1,000 units and/or commercial developments in excess of 10,000 sq.m. or any mixed use proposal that meets these thresholds individually or in combination; shall be accompanied by an audit of community and cultural facilities in the vicinity and demonstrate how the proposal can contribute to any identified shortfall in the area. The audit shall be

undertaken in consultation with the Community Section and the Arts Office of Dublin City Council.

#### 3.12 Chapter 12 Sustainable Communities and Neighbourhoods

# (a) Relevant Aspects of RSES & MASP

The relevant RSES Chapter is reviewed and synopsised below: Chapter 9 Quality of Life.

This chapter is concerned with healthy, strong and inclusive communities and Healthy Placemaking is the driver for this chapter. Successful places support a wide range of services that meet local and strategic needs and contribute towards a good quality of life. These include health, education, libraries, childcare, community centres, play, youth, recreation, sports, cultural facilities, policing, places of worship, burial grounds and emergency facilities. The RSES places an emphasis on the identification of social infrastructure needs to support population growth and the locating of local social infrastructure within walking distance of where people live. The RSES seeks enhanced coordination between local authorities and providers / stakeholders so that social infrastructure is provided to serve communities.

### (b) Implications for Chapter 12 of City Development Plan

The CDP's Sustainable Communities and Neighbourhoods Chapter is consistent with the RSES. Small text changes are proposed.

### (c) Proposed Variation

### Alter the first paragraph of Section 12.4 The Strategic Approach as set out Below:

The strategic approach reflects the national policy guidance with regard to quality of life enhancement and the alignment of social infrastructure provision with policies where people live and work (National Spatial Strategy) (National Planning Framework 2040).

#### Resolution:

"That Dublin City Council notes Report No. 309/2019 to initiate the variation to the Dublin City Development Plan 2016 – 2022 as outlined in the report".

Richard Shakespeare
Assistant Chief Executive
23<sup>rd</sup> October 2019