



Proposed Variation (No. 7) of Dublin City Development Plan 2016-2022

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

Introduction to Variation Proposal

It is proposed to vary the Dublin City Development Plan in order to incorporate the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES), in accordance with Section 11 of the Planning & Development Act 2000, as amended. Also included are some other changes to the Development Plan to incorporate immediate issues arising from the Climate Action Plan for the City.

Following the making of the Regional Spatial & Economic Strategy for the Eastern & Midland Region in June 2019, all local authorities within the Region are required to review the content of their Development Plan and particularly their Core Strategies, with a view to either commencing a review of the Development Plan or making a variation to the Plan, within a 6 month period.

A report outlining an assessment of the current City Development Plan, and the changes necessary was prepared by the Chief Executive, and presented to Members at the November 2019 City Council Meeting. This report advised that a variation process be commenced to meet the requirements of the Planning Acts as the most appropriate response; and outlined the proposed changes to form the variation. This report (No. 309/2019) was noted at the Council meeting.

The variation was subsequently placed on public display, and all relevant statutory agencies notified, and a public notice placed in a national newspaper. The public consultation period closed on the 20th of December 2019. In total nine submissions were received.

This report identifies, summarises and responds to the nine submissions received and gives the Chief Executives response as required by the variation process. It should be noted that a decision on the variation is required by the Planning Acts within fourteen weeks of the publication of the public notice commencing the consultation period.

This report is divided into six subsequent sections:

1. Purpose of the Variation
2. Summary of the content of the Variation (full text in appendix A)
3. Procedure Followed for Preparation of Variation, Public Consultation & List of Submissions Received

4. Submissions that require individual consideration and the Chief Executives Response to each
5. Summary of all other Submissions Received and the Chief Executives Response to the issues raised
6. Recommendation of the Chief Executive on the Proposed Variation.

The text of the proposed Variation is fully set out in Appendix A attached. It is only reproduced within the body of this report where required for context. The text of the proposed Variation which was on public display / distributed to Members, is shown in **red**.

Where a technical change to include new text to the proposed Variation is proposed by the Chief Executive this is shown in **green**. Where a technical change is proposed to omit text from the proposed Variation this is shown in **red** with a strike through.

Where a change to the variation is recommended by the Chief Executive within the body of this report, such recommendations are numbered using a prefix "R", to read R1, R2.. etc.

1. Purpose of the Proposed 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. The variation was to be triggered before the 10th January 2020.

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 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 (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.

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.

2. Summary of the Content of the Variation

The changes proposed for this variation fall into four 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 this is averaged per year the figures are 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.

(iv) To require largescale residential and commercial development proposals to identify and address any shortfalls in community and cultural facilities in the relevant area.

3. Procedure Followed for Preparation of the Variation, Public Consultation & the List of Submissions Received

As a variation to the City Development Plan, the proposed changes were screened for Strategic Environmental Assessment and Appropriate Assessment prior to initiating the variation process and the appropriate authorities consulted. Following completion of this screening stage, the variation was prepared for public consultation.

a. Public Consultation

In accordance with the procedures set out in Section 13 of the Planning and Development Act, 2000 as amended, a Public Notice was published in the Irish Independent on 21st November 2019. The proposed variation was placed on public display in the Civic Offices, Wood Quay from Thursday 21st November 2019 to 20th December 2019 (both dates inclusive).

Details were also made available on Dublin City's website at www.dublincity.ie. Notice and copies of the proposed variation of the Development Plan were sent to the Minister, the Office of the Planning Regulator, the Eastern and Midland Regional Assembly, adjoining planning authorities, the prescribed authorities and others.

b. Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) Screening Determination has been made by Dublin City Council regarding the proposed Variation (No. 7) to the Dublin City Development Plan 2016 – 2022 to incorporate the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES).

The Planning Authority has determined that the proposed Variation (No. 7) would not be likely to have significant effects on the environment, taking account of relevant criteria set out in Schedule 2A of the Planning and Development Regulations, 2001, as amended, and taking into account an observation by the EPA dated 31st October 2019.

Appropriate Assessment

An Appropriate Assessment Screening was undertaken of the proposed variation of the Dublin City Development Plan, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The proposed Variation is not predicted to have any likely impact on the key features or the conservation function of any Natura 2000 sites.

The prescribed bodies were consulted in relation to AA, and no submission or observation was received within the appropriate period.

c. Submissions Received

The following persons or bodies made submissions or observations during the public consultation. Submissions are listed in the order they were received and processed. All nine submissions are published on the Council consultation webpage, <https://consultation.dublincity.ie/>

Sub.	Name	Surname	Title	Organisation
No. 1	Stephen	Devine	N/A	N/A
No. 2	Jim	Conway	Director	Eastern and Midland Regional Assembly
No. 3	Niamh	McDonald	Asset Strategy & Sustainability Regional Forward Planning Specialist	Irish Water
No. 4	David	Murray	A/Senior Planner	Fingal County Council
No. 5	Róisín	Shortall	TD	Leinster House
No. 6	Frank	Keoghan	N/A	N/A
No. 7	Gary	Ryan	Director	Office of the Planning Regulator
No. 8	Natasha	Crudden	N/A	TII (Transportation Infrastructure Ireland)
No. 9	Alan	Hanlon	Site Acquisitions and Property Management Section	Department of Education and Skills

4. Submissions that Require individual consideration and the Chief Executives Response to each.

Two submissions were received within this category; (i) Office of the Planning Regulator (submission No. 7) and (ii) Eastern and Midland Regional Assembly (submission no.2).

4.1 Office of the Planning Regulator (Submission No. 7)

Summary of the Submission:

The Office welcomes the proposed variation and is generally satisfied that it will align the plan with the NPF and the RSES. The submission raises three points.

The OPR recommends that the variation be amended by not including in the variation *Proposed Amendment Reference No. 11*:

'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)'.

The OPR submission advises that it may be appropriate to:

- make more specific reference to the strategic development and employment areas within the City Council's administrative area by including in the text of the variation specific listing of the Strategic Development Areas within the City that are contained in the RSES and MASP,
- make it explicit as part of the changes included with this variation that the development plan's building height policy and standards will be reviewed as part of the forthcoming development plan.

Chief Executives Response

The Chief Executive welcomes the submission by the OPR, and the recognition that the inclusion of the NPF and the RSES within the City Development Plan at this time will meet the requirements of the Planning Acts (as amended).

The suggested text omission in relation to climate change monitoring by the OPR is noted. The proposed text identified by the submission is considered at this time premature pending imminent guidelines being developed by the Department of Housing, Planning & Local Government. Removing it from the variation is considered to be a technical correction that does not impinge on the overall variation and this change should be included in the variation to be considered by the Members.

It is also considered that the specific naming of the Strategic Development Areas, repeating the list from the RSES and MASP into the text of the variation is a technical addition and can be included without impacting on the variation.

In relation to the referencing of Urban Development and Building Height Guidelines, this policy requirement will be fully addressed in the upcoming review of the City Development Plan. Work has now commenced internally on preparing for the review and consideration of the height policy will be fully integrated and framed within new policies on regeneration, transport corridors and implementation of the National Planning Framework and RSES within the

context of and balanced with heritage, amenity, community and environmental policies for the City.

Chief Executives Recommendations in Response to OPR Submission

R1: Omit Proposed Amendments Reference No. 11

~~'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).'~~

R2: Insert Non-material amendment (in green) in Proposed Amendments Reference No.5:

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.

Strategic Development Areas:

Multi-Modal Location - City Centre within the M50

- Residential: Docklands and City Centre, Naas Road, north east inner city lands, Parkwest – Cherry Orchard, Ballymun, Ashtown-Pelletstown and St James – Heuston Lands.
- Employment: Docklands and Poolbeg, Diageo lands and St James and Grangegorman campus, Naas Road

DART Corridor - (North South)

- Residential: North Fringe (Clongriffin / Belmayne)
- Employment: 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 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.

2. Eastern and Midland Regional Assembly (Submission No. 2)

Summary of the Submission:

The Regional Assembly considers that the proposed Variation to the Dublin City Development Plan 2016 – 2022 and in particular the Core Strategy, is consistent with the Regional Spatial and Economic Strategy (RSES) 2019 – 2031 having regard to the following observations.

It welcomes:

- the explicit recognition of the policy hierarchy with which the CDP is required to be consistent with including the Metropolitan Area Strategic Plan (MASP) which is a key policy driver for the sustainable growth of Dublin as a city forming the top tier in the Settlement Hierarchy.
- the inclusion of compact growth objectives to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs.
- the incorporation of revised population growth targets including the application of headroom at 25% as set out in the Implementation Roadmap for the NPF issued under DHPPG Circular FPS04/2018; Revised Table A demonstrates that Dublin City Council can support achievement of NPF policy.

The submission draws the Council's attention to the transitional population projections methodology in the NPF Implementation Roadmap and National Policy Objective (NPO) 68 of the NPF which allows for up to 20% of the phased population growth targeted in Dublin city and suburbs to be accommodated in the wider metropolitan area - for example, Bray, Maynooth and Swords. The c. 100,000 additional people by 2031 for Dublin City Council's administrative area as set out in the RSES is subject to the determination of population transfer targets under NPO 68 which is to be agreed in consultation with the MASP Implementation Group (Section 5.7 of the RSES refers).

In relation to housing land capacity EMRA notes that the CDP provides capacity in excess of the required population and housing figures and that the concurrent proposed Variations 8 to 27 of the Dublin City Development Plan provide for a range of mixed use development potential including residential to cater for future growth needs consistent with national and regional policy. The submission states that EMRA considers that a sub-regional Housing Need Demand Assessment (HNDA) is the appropriate approach for the four local authorities

In relation to Amendment Reference No. 24 EMRA supports this aspect of the variation which requires large scale residential and / or commercial proposals to be accompanied by an audit of community and cultural facilities in the vicinity and to demonstrate how the

proposal can contribute to any identified shortfall in the area; this accords with requirements in the RSES to provide for social as well as physical regeneration in the MASP.

With regard to brownfield development EMRA highlights to the City Council in the submission that the RSES sets out Guiding Principles for infill and brownfield development including the creation of a brownfield database at the local level and that regeneration lands are identified in Core Strategies. The submission notes that Dublin City Council propose to rezone a number of underutilised brownfield lands. The proposed Variation No. 7 will support and complement the concurrent proposed Variations no's 8 – 27 (to be subject to separate submission).

The submission welcomes the incorporation of new RSES Climate Objectives into the CDP. It points out in support of the variation that EMRA is leading an ESPON EU research programme to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies and this may inform the development plan review. It welcomes the commitment of the City Council to achieving a transition to a low carbon society through the implementation of the Dublin Climate Change Action Plan (CCAP) supported by Climate Action Regional Office (CARO) and Codema. The proactive approach to climate change in the CCAP is in keeping with the RSES Key Principle on Climate Action which is supported by RPOs 6 – 11 of the RSES.

Chief Executives Response

The submission from EMRA and the support expressed for the variation in meeting the requirements of the RSES and NPF in relation to the Core Strategy is welcomed.

The comments regarding the preparation of a Housing Need Demand Assessment are noted and will form a core part of the preparatory work of the upcoming Development Plan review process. Dublin City Council is currently pursuing a four local authority approach to the development of a Housing Need Demand Assessment (HNDA) and looks forward to liaising with EMRA in this undertaking.

The support expressed by EMRA for the incorporation of new RSES Climate Objectives into the Development Plan and the commitment of the City Council to achieving a transition to a low carbon society through the implementation of the Dublin Climate Change Action Plan is also recognised.

EMRA's supportive comments in respect of Proposed Amendment Reference No. 24 are noted.

Chief Executives Recommendations in Response to EMRA Submission

The variation is recommended for adoption.

5. Summary of All Other Submissions and Chief Executives Response

In this section, due to the short number of submissions received, firstly a summary is given of each of the submissions and the points/changes suggested and whether they supported the making of the variation or not. The response by the Chief Executive is then outlined to the main points/concerns raised, some of which appear in a number of the submissions.

Summary of the Content of the Submissions

Submission No. 1 (Stephen Devine)

This submission seeks a number of changes to the variation, namely;

- Proposed Amendments Reference No. 3 The Dublin Metropolitan Area Strategic Plan (MASP) lists strategic assets (green infrastructure and amenities) for the Metropolitan area. The development plan should explicitly mention these including St. Anne's Park which is omitted from the RSES;
- Proposed Amendments Reference No. 5 The submission agrees that Core Strategy of Development Plan accords with the NPF; it expressed the view that the final paragraph of Amendment No. 5 offers no certainty with respect to heavily utilized Z15 lands; and that it would be helpful to understand that such lands are not considered in-scope of brownfield, infill and /or under-utilised sites.
- Proposed Amendments Reference No. 8 The submission agrees that objectives and policies of the Plan remain consistent with the high level national and regional policies.
- Proposed Amendments Reference No. 12 The submission seeks that page 91 of City Climate Change Action Plan should be reproduced; this refers to the target of 'reducing soil sealing in Dublin' and related action type (Green Infrastructure) and stakeholders (Schools etc).
- Proposed Amendments Reference No. 16 It seeks that the new Objective CC016 should be broadened so that bicycle parking would be electric charge enabled.

Submission No. 3 (Irish Water).

Irish Water has no objection to the proposed Variation concerning the alignment of the City Development Plan with National Planning Framework and the Regional Economic & Spatial Strategy for the East and Midlands Region.

Submission No. 4 (Fingal County Council)

Fingal County Council welcomes the opportunity to work with other Dublin Authorities to achieve continued sustainable and consolidated population and employment growth in the city and wider Dublin area with a key focus on improving housing supply, amenity provision and improved public transport and sustainable travel options. It notes the proposed amendments to Chapter 2 (Core Strategy) of the CDP and it reiterates its support for the changes required to the City Development Plan to now render it consistent with the NPF and the RSES.

Submission No. 5 (Rósín Shortall TD)

This submission strongly objects to the incorporation of the NPF and RSES into the CDP. It states that reducing the housing targets from 29,500 to 21,939 – 26,439 is unambitious during a housing crisis; incorporating the RSES and NPF into the City Development Plan means that relevant Section 28 Guidelines which relax apartment standards and lift height restrictions will be used in the assessment of planning applications. The submission states that this completely undermines the CDP, disregards the democratic decision making of elected councillors and will lead to substandard and inappropriate development. It considers that high rise is appropriate in the Docklands and other strategic locations and is inappropriate in low-rise suburbs due to negatively impacting on residential amenities / the skyline. Current CDP height policies allow for higher density development while protecting these amenities and existing patterns of development; allowing one-bed accommodation and studios will not create sustainable communities, do not suit families and show little regard for existing communities.

Submission No. 6 (Frank Keoghan)

This submission objects to the guidelines contained in Urban Development and Building Heights Guidelines for Planning Authorities which are guided by the NPF which are totally unsuited to existing residential communities which cannot support the necessary infrastructural enhancements associated with increased population density. Issues such as traffic could be alleviated by more rapid development of public transport supported by Local Area Plans prior to development commencing.

Submission No. 8 (TII – Transportation Infrastructure Ireland)

No specific comment to make, variation is noted.

Submission No. 9 (Department of Education and Skills)

The NPF's objective that at least 50% of all new homes targeted for Dublin City and suburbs are delivered within its existing built-up footprints' and that the NPF particularly highlights the need to focus on underutilized lands within the canals and the M50 ring impacts significantly on the Department of Education's considerations on how best it provides adequate and suitable education provision for both existing and future schools within the existing built up footprint of the city. Future engagement between the Department and DCC must take into account the objectives of the RSES (long and short term population growth) and the objectives of the NPF and RSES. In view of the fact that the review of the City Development Plan is to commence shortly, the Department is therefore seeking early engagement with the Council and the consideration of the following: Need for Social Infrastructure Audits to include schools; protection of lands for schools for projected demographic demand to 2040 (life of Project Ireland); development of a primary key adjacency consideration for school site selection; and, that no undue burden (over and above national policy) be placed on school development in terms of energy efficiency. Finally the Department has found it difficult to assess the incremental impact of individual Strategic Housing Development on overall school numbers relative to the total projected residential numbers envisaged for the life of the development plan.

Chief Executive's Response to the Issues Raised by the Submissions Received

Introduction

The Chief Executive's Response to the issues raised is set out below. The considered and careful consideration of the proposed variation prepared by those who wrote the submissions is welcomed and a key part of the democratic process that shapes the City Development Plan.

As required by the Planning and Development Act, 2000, as amended, the response and recommendation made to the issues raised by the Office of the Planning Regulator and those of the Regional Assembly are outlined in the earlier section above, and should be read in conjunction with the following responses.

Most of the issues raised in the submissions received relate to the 25 proposed changes to the City Development Plan that form the variation. These 25 changes are grouped, as appropriate, under umbrella headings listed below, which correspond to the relevant chapters of the City Development Plan the variation proposes to change.

Issues raised that do not relate to the 25 proposed changes to the City Development Plan are responded to in a separate subsection of this response under the heading '*Other Issues*'.

The Chief Executive's Response and Recommendation on the remaining seven submissions is structured as follows:

- (a) Vision and Core Strategy
- (b) Addressing Climate Change
- (c) Built Heritage and Culture
- (d) Other Issues

(a) Vision and Core Strategy addressing Proposed Amendments Reference No. 5, 6, 7 & 8 (Submissions 1, 2, 4 and 7).

The supportive comments received in respect of the proposed changes to the Core Strategy of the City Development Plan are noted and welcomed.

The current housing allocation for the City Development Plan is 29,500 (**over 7 years**), the proposed variation range is 21,939 - 26,439 (over a 6 year period). When viewed as an annual figure, this equates to 4,215 p.a. under the current 2016 City Development Plan, and a range of 3,656 – 4,400 p.a. under the RSES. Thus the proposed revised housing allocation figure have no significant impact for the City Development Plan. In addition to this, as EMRA notes (**Submission No. 2**), the Core Strategy in the current plan identifies a capacity to accommodate housing growth in excess of 55,000 dwellings and the City Council is currently proposing to provide more housing land under proposed Variations No.'s 8 to 27. EMRA's comments that this is consistent with National and Regional Planning Policy and Brownfield Development Policy are welcomed. Whilst concerns are expressed that the numerical change is a lowering of ambition and targets for the City in delivering housing, this is not an accurate assessment of the changes being proposed, and does not take account of the technical difference in changing from calculating the target from one over a 7 year period to one over a 6 year period.

It should be noted that Dublin City Council currently provides housing land in excess of that required by previous national and regional policy, and will continue to do so. The NPF and RSES, by seeking greater use of brownfield in meeting future housing need, gives an

imperative to the Council to continue to deliver new regeneration projects across the City as a central aspect of addressing housing need within the Region. The City Council, in pre-empting this need for the compact growth of the city and in anticipating its future long term housing and employment needs, committed under Objective CEE04 of the current Plan to review the City's employment lands (Z6 and Z7) to assess their potential to contribute to the sustainable long term growth of the city.

It is through this Z6 study that suitable landbanks are being identified for intensive redevelopment purposes to provide housing and employment development in the short, medium and long term. In the short to medium term the City Council is proposing to provide more housing lands under proposed Variations No.'s 8 to 27.

At the same time, the City Council recognises and supports the critical role that existing community services and facilities provide to new and existing residential development, such as those found on Z15 lands. The City Development Plan seeks to support and protect these facilities and their key role in accommodating the social infrastructure needs of a denser city in implementing the NPF and RSES. This issue will be considered in the upcoming review of the City Development Plan, due to commence this year.

(b) Addressing Climate Change (Submission No. 1)

The Chief Executive welcomes the positive comments received in respect of the incorporation of the Dublin Climate Change Action Plan into the City Development Plan.

The proposed Variation includes a link to the published Dublin Climate Change Action Plan and therefore it is not considered necessary to reproduce elements of the document in the City Development Plan in this Variation.

The Chief Executive agrees with the general tenet of the submission about electric charge enabled bicycle parking and the planning and development management issues arising from this aspect of sustainable movement shall be examined as part of the City Development Plan review.

(c) Other Issues (Submissions No. 1, 5, 6, 9)

Green Infrastructure

Figure 14 (Strategic Green Network) of the current City Development Plan shows the Green Infrastructure for the city including St. Anne's Park. It is considered at this time that the Development Plan already more than adequately responds to the RSES requirements for a green network across the Region and that the policies in place in the current City Plan deliver the vision and give the more appropriate level of detail necessary at a local authority level. This implementation of Green Infrastructure will be reviewed as part of the preparation work on the new City Development Plan and submissions on this issue during the consultation phases in preparing the City Development plan would be welcomed.

Building Height

Two submissions raise the linkage between the National Planning Framework, particularly the National Policy Objective (NPO) 13 which addresses standards for height, the Urban

Development & Building Height Guidelines for Planning Authorities published by the DHPLG under Section 28 of the Planning Acts and the variation.

On foot of the publication of these Guidelines the consideration of issues of building height and density as part of the development management process, must include cognisance of these guidelines. Dublin City Council is currently implementing these guidelines through the development management process. The variation process, whether passed or not, will not change the Councils obligations in this regard.

In relation to the requirement within the Urban Development and Building Height Guidelines for the specific planning policy requirements listed to be incorporated in the City Development Plan; it is considered that these will be more appropriately and comprehensively addressed in the upcoming review of the City Development Plan. Work has now commenced internally on preparing for the review and consideration of the height policy will be fully integrated and framed within new policies on regeneration, transport corridors and implementation of the National Planning Framework and RSES within the context of and balanced with heritage, amenity, community and environmental policies for the City.

Schools

The Department of Education and Skills (DES) submission is noted as is the need for improved collaboration and shared research. The Planning Department is currently in the process of setting up a DCC / DES working group to progress school requirements for the City in the context of the Development Plan Review and school planning at the local level for the short / medium to long term.

6. Recommendation to City Council:

Having regard to the submissions received and to the Chief Executive's Response and Recommendation to the issues raised therein, it is recommended that the City Council adopt the Proposed Variation (No. 7) of the Dublin City Development Plan 2016-2022 with the suggested technical amendments outlined below:

R1: Omit Proposed Amendments Reference No. 11

~~'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).'~~

R2: Insert Non-material amendment (in green) in Proposed Amendments Reference No.5:

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.

Strategic Development Areas:

Multi-Modal Location - City Centre within the M50

- Residential: Docklands and City Centre, Naas Road, north east inner city lands, Parkwest – Cherry Orchard, Ballymun, Ashtown-Pelletstown and St James – Heuston Lands.
- Employment: Docklands and Poolbeg, Diageo lands and St James and Grangegorman campus, Naas Road

DART Corridor - (North South)

- Residential: North Fringe (Clongriffin / Belmayne)
- Employment: 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 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.

I recommend that the Elected Members adopt the following resolution:

‘The members of the authority having considered the proposed variation and the Chief Executive’s Report No. 36/2020, and the issues raised, the proper planning and sustainable development of the City, the statutory obligations of the local authority and the relevant policies or objectives of the Government or of any Minister of the Government; the City Council resolves that the Proposed Variation No. 7 of the Dublin City Development Plan 2016-2022 is hereby made and that the necessary notices of the making of Variation No. 7 of the Dublin City Development Plan 2016-2022 be published’.

Richard Shakespeare
Assistant Chief Executive

APPENDIX A

Appendix A: PROPOSED VARIATION No.7 of the Dublin City Development Plan 2016 - 2022

The following are the proposed changes to the 2016 – 2022 City Development Plan. The 'Struck-through'-text is to be omitted and proposed changes are shown by **Red Text**.

A. Chapter 1 of the City Development Plan – Strategic Context for the City Development Plan 2016 – 2022

Proposed Amendments Reference No. 1

Insert the Following Text in Section 1.3: Statutory Context, After the First Sentence of the Second Paragraph.

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.

Proposed Amendments Reference No. 2

Insert the following Text in Section 1.3: Statutory Context, as a Last Paragraph.

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.

B. Chapter 2 of the City Development Plan – Vision and Core Strategy:

Proposed Amendments Reference No. 3

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...

Proposed Amendments Reference No. 4

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)

Proposed Amendments Reference No. 5

Insert the Following Text after Current First Paragraph of Regional Planning Guidelines in Section 2.2.1

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 28th 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 52,000 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.

Proposed Amendments Reference No. 6

Insert Figure (and Figure Title) from Dublin Metropolitan Area Strategic Plan – Figure 5.2 at end of Dublin Metropolitan Area Strategic Plan (MASP)



Fig. 2a Dublin Metropolitan Area Strategic Plan

Proposed Amendments Reference No. 7

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.

	A	B	C	D	E	F	G
	2016 CSO Census figure	2019 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	554,500	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)

*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	D	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	527,612	530,208*	563,512	606,110	75,902 Average annual equivalent = 8434	59,038	
Housing Allocation	-	-	265,519	319,903		Housing requirement for the plan period based on the above figure — assuming 2 occupants per residential unit = 29,500 units	

*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)

Proposed Amendments Reference No. 8

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 conclude that the policies and objectives of this Dublin City Development Plan remains consistent the high-level national and regional policies.

Proposed Amendments Reference No. 9

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 ~~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.

C. Chapter 3 of the City Development Plan – Addressing Climate Change

Proposed Amendments Reference No. 10

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.

Proposed Amendments Reference No. 11

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).

Proposed Amendments Reference No. 12

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 assist towards meeting National and EU targets. This will be adopted by end of 2018.~~

CC01: To implement Dublin City Council's Climate Change Action Plan 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>

Proposed Amendments Reference No. 13

Objective CC08 Insert Text as Follows

CC08: 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.

Proposed Amendments Reference No. 14

Policy CC3 Insert Text as follows

CC3: 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).

Proposed Amendments Reference No. 15

Objective CC015 Insert Text as follows

CC015: To facilitate the provision of electricity charging infrastructure for electric vehicles in all new development and in the public realm.

Proposed Amendments Reference No. 16

Insert New Objective CC016:

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.

Proposed Amendments Reference No. 17

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.

D. Chapter 4 of the City Development Plan – Shape and Structure of the City

Proposed Amendments Reference No. 18

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

E. Chapter 5 of the City Development Plan – Quality Housing

Proposed Amendments Reference No. 19

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.

Proposed Amendments Reference No. 20

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

Proposed Amendments Reference No. 21

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.

Proposed Amendments Reference No. 22

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).

F. Chapter 8 of the City Development Plan – Movement and Transport

Proposed Amendments Reference No. 23

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)**

G. Chapter 11 of the City Development Plan – Built Environment and Culture

Proposed Amendments Reference No. 24

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

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.

H. Chapter 12 of the City Development Plan – Sustainable Communities and Neighbourhoods

Proposed Amendments Reference No. 25

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**)....

Owen P. Keegan
Chief Executive
20th February 2020