



# Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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## Draft Dublin City Development Plan 2022-2028

The Eastern and Midland Regional Assembly notes the publication of the Draft Dublin City Development Plan 2022-2028 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 11<sup>th</sup> February 2022.

### Regional Spatial and Economic Strategy (RSES)

As indicated in the Assembly's previous submission to the City Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended, The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region, made on 28<sup>th</sup> June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Planning and Development Act 2000, as amended (the Act). In this regard, The Assembly welcomes the publication of the Draft Dublin City Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional and national planning policy.

### Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission, and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy are consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

## **Submission**

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. Accordingly, the Assembly welcomes the overall approach and effort of Dublin City Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission. The submission broadly follows the chapter headings of the Draft Development Plan, under the following headings:

1. Strategic Context and Vision
2. Core Strategy
3. Climate Action
4. Shape and Structure of the City
5. Quality Housing and Sustainable Neighbourhood
6. City Economy and Enterprise
7. The City Centre, Urban Villages and Retail
8. Sustainable Movement and Transport
9. Sustainable Environmental Infrastructure and Flood Risk
10. Green Infrastructure and Recreation
11. Built Heritage and Archaeology
12. Culture
13. Strategic Development Regeneration Areas
14. Land Use Zoning
15. Development Standards
16. Monitoring and Implementation
17. SEA, AA and SFRA

### **1.0 Strategic Context and Vision**

The Assembly welcomes the inclusion of the first chapter of the Draft Plan, which provides an overview of scene setting matters including the Strategic Approach, the Vision, Statutory Context and Strategic Policy Context.

Notwithstanding the statement at Section 1.4 of the Plan which states that ‘The plan is required to be consistent with national and regional planning and development policy’, it is considered that this could be strengthened through emphasising the legislative context and planning policy hierarchy with which the City Development Plan is required to be consistent with, including a clear indication that the Dublin City Development Plan is required to be consistent with the RSES for the Eastern and Midland Region.

Specific reference in the Draft Plan to the RSES and the Dublin Metropolitan Area Strategic Plan (MASP), at Sections 1.9.5 and 1.9.6 respectively, are positive additions in contextualising this plan review.

### **2.0 Core Strategy**

The Assembly acknowledges the work that has gone into the preparation of Chapter 2 which details the Core Strategy, Settlement Strategy, Economic and Employment Strategy, and the Retail Strategy.

As part of Chapter 2, the Assembly welcomes the inclusion of the indicated purpose of this chapter which is stated to ‘guide the spatial direction of future development and regeneration in the city in line with the principles of compact growth.’ The provision of the legislative basis and policy context also help to frame the Core Strategy Chapter which is enhanced by reference to the National Planning Framework (NPF), the RSES and Dublin MASP.

## **2.1 Statutory Requirements**

Dublin City Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. Relating specifically to this chapter of the Draft Plan, the Assembly draws the attention of the Council to the contents of Section 10 (2A), (2B) and (2C) of the Act and asks Dublin City Council to ensure consistency in this regard.

## **2.2 Population and Housing**

### **2.2.1 Population Allocation**

It is noted that Section 2.2 outlines the quantitative data underpinning the Core Strategy and makes reference to the ‘Eastern Midland and Regional Authority’ population allocation. This should be revised to the ‘Eastern and Midland Regional Assembly’. The Core Strategy identifies a target population for Dublin City for the year 2028 (the end of the plan period) of 625,750 (Low) to 640,000 (High) persons. This means that the development plan must accommodate between 21,350 - 31,450 additional persons up to an overall population target of between 625,750 and 640,000 by 2028. It is noted that the Draft Plan has determined the population targets using the RSES population projections as adjusted to comply with NPO 68 of the National Planning Framework (NPF). In this regard, the inclusion of Table 2-6 and that the RSES figures have been used to extrapolate population figures aligning with the development plan period, is welcome and is considered to be in keeping with the RSES and NPF.

### **2.2.2 Housing Supply**

In calculating housing supply for the plan period, the Assembly welcomes the application of the methodology outlined in Housing Supply Target Methodology for Development Planning Guidelines, issued in December 2020 under Section 28 of the Planning and Development Act, 2000 (as amended).

Using this methodology, the stated housing demand for the years 2022 to 2028 (the relevant development plan period) is approximately 40,000 (40,138) residential units for the six-year period. This figure includes the addition of estimated homeless figures to this residential need.

## **2.3 Land Capacity**

It is noted that the Draft Development Plan outlines that there are approximately 550 hectares available to develop during this development plan cycle which can provide approximately 48,500 residential units. As outlined in the Draft Plan, this demonstrates that there is sufficient capacity to accommodate the stated housing demand of 40,000 residential units over the plan period. The majority of this residential capacity is located within the seventeen Strategic Development Regeneration Areas (SDRAs) that are listed at Table 2-8 of the Draft Development Plan. The Assembly welcomes that many of these sites are also outlined as Strategic Development Areas within the Dublin MASP contained within the RSES (Table 5.1).

In addition to the above, the Assembly notes that lands at Glasnevin and Naas Road may also be brought forward as regeneration lands during the lifetime of the development plan, subject to feasibility studies and/ or the preparation of a Local Area Plan (or, if designated, a Strategic Development Zone). As stated, these land-banks fall under the RSES strategic development areas

called 'Industrial Lands' (table 5.2 of the RSES) where the potential is given as 're-intensification of older industrial lands subject to feasibility'. The Assembly welcomes that any feasibility study carried out on these lands over the course of the development plan period will include a service capacity investment audit detailing infrastructural requirements to necessitate the densification and intensification of the areas given locational proximity to existing public transport corridors.

The Assembly further notes that these lands are not zoned as yet, but may be brought forward to ensure that the Core Strategy is implemented in the appropriate timescale and may require a variation and updating of the Core Strategy should they come on stream.

As per Table 2-11 of the Draft Plan, and as mentioned above, it is noted that the residential capacity of available land (48,500 units) exceeds that of the housing need demand requirement (40,150 units). This represents an exceedance rate of 20%. The Assembly considers that this additional provision of zoned lands accords with the Draft Development Plan Guidelines published in August 2021, including the relevant criteria stated at Section 4.4.3 of these Guidelines, which outlines that any such additional provision must not exceed 20-25% of the required quantum of zoned land for the plan period. It is considered that the Draft Plan further explains this exceedance rate through outlining that most of the land targeted for new housing in the city is located in SDRAs, which are for the most part, brownfield and regeneration sites which are aligned to existing and planned public transport corridors and guided by national policy set out in the NPF and RSES. It is noted that the Draft Plan states that these SDRAs will take long periods of time to be fully delivered, with many running across two development plan cycles to reach completion, and furthermore, in order to achieve the high quality, integrated approach necessary for successful regeneration, it is critical that the entire envelope of these lands is zoned for development and subject to detailed master-planning and/ or local statutory plans that address how they will be delivered over time.

## **2.4 Housing Strategy and Housing Need Demand Assessment (HNDA)**

The Assembly welcomes the inclusion of the Housing Strategy that incorporates a Housing Need Demand Assessment (HNDA) as summarised at Section 2.3.3 of the Draft Plan. It is noted that Dublin City Council has undertaken a HNDA, as part of the Housing Strategy, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5, using the HNDA Toolkit Methodology.

The Assembly notes the indication within the Draft Plan that the HNDA Toolkit's Convergence Scenario produces a significantly different estimate of housing demand for the plan period, as it is based on a longer-term approach to calculating housing demand. It is stated that this is because 'the DHLGH's HNDA Toolkit is intended to give broad, long-run estimates of housing need from 2020 to 2040, rather than condensing housing need, housing shortfalls and unmet demand into a tight six-year period as required by DHLGH's Housing Supply Target methodology. Therefore, the Convergence Scenario should be considered as a broad demographic estimate rather than a planning target'. Despite this difference, the Assembly welcomes the indication that tenure percentage breakdown of need would remain the same whatever total new household scenario or figure is used.

## **2.5 Tiered Approach and Phasing**

The Assembly welcomes the inclusion within the Draft Plan of the reference to the requirement under NPO 72a, for a local authority to differentiate between zoned lands that are serviced and zoned lands that are serviceable within the life of a development plan. The Assembly notes the specific circumstances within Dublin City in that the entire plan area is fully zoned and located within the metropolitan area of Dublin. It is noted that whilst there may be local infrastructural needs and

upgrades needed for certain sites, all lands within the city are capable of being serviced and/or are connected to the public water systems, and, all are located proximate to public transport networks and public road and cycle routes.

Whilst the Assembly notes the above and the contents of Appendix 10 of the Draft Plan, it is recommended that the Local Authority provide a Tiered Approach to Zoning in line with the requirements of NPOs 72a, b and c of the NPF, for all of the targeted development lands identified as part of the Draft Plan. This tiered approach will differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan and detail an estimate of the full cost of delivery of the specified services. It is considered that this tiered approach will facilitate the prioritisation of development lands within the Local Authority. As part of this prioritisation, the Local Authority should consult with Section 3.1 of the RSES which details an asset-based approach in order to determine an overall growth strategy and settlement hierarchy.

## **2.6 Core Strategy Table and the Settlement Strategy**

The Assembly notes Section 2.4 of the Draft Plan which details the Settlement Strategy of Dublin City. It is noted that the existing settlement pattern and movement, on main transport corridors, forms the basis for the Settlement Strategy presented.

The Assembly welcomes that compact growth will be promoted throughout the city through appropriate infill development and consolidation of brownfield sites and targeted growth along key transport corridors. The indicated prioritisation of development in the inner city and the Key Urban Villages, whilst specifically targeting the Strategic Development and Regeneration Areas (which are primarily brownfield lands located in both inner and outer city areas, where there is capacity to absorb a greater intensification of development owing to their proximity to public transport corridors and supporting urban infrastructure) is welcome. It is considered that this is in keeping with RSO 2, RPO 3.2 and 3.3 of the RSES, and reinforces the Guiding Principles for the sustainable development of the Dublin Metropolitan Area as outlined within the Dublin MASP at Section 5.3 of the RSES.

Whilst the Assembly acknowledges the presentation of the Settlement Strategy at Section 2.4 of the Draft Plan, it is noted that the Draft Plan does not contain a Core Strategy Table. In line with Section 1.3.2 of the Draft Development Plan Guidelines for Planning Authorities issued in August 2021, it is acknowledged that in the cities there will be a well understood structure of 'major town centres', 'district centres and 'urban villages' and while the distinction between the 'core' and 'periphery' will be important considerations in targeting growth, there may not be the same discrete hierarchy of settlements as can be found in other counties. Notwithstanding this, the Guidelines outline a 'Differentiated approach to Core Strategy Tables' including a Core Strategy Table approach for the Cities which should be followed by planning authorities to outline the allocation of housing and population. Accordingly, it is recommended that a Core Strategy Table is included in line with the aforementioned Guidelines that seeks to identify, and provide robust estimates, for areas identified for growth within the city and to also make estimates for residual infill development potential.

As part of this, the Assembly considers that this should include reference to residential densities that reflect Dublin's role as outlined in national and regional policy, and which are consistent with key national and regional strategic outcomes focused on sustainable settlement patterns and compact growth. Planning Guidelines that relate include the Sustainable Residential Development

in Urban Areas (the ‘Sustainable Residential Development Guidelines’), issued in 2009, the Sustainable Urban Housing: Design Standards for New Apartments (the ‘Apartment Guidelines’) issued in 2020, and the Urban Development and Building Heights Guidelines for Planning Authorities (the ‘Building Height Guidelines’), issued in 2018.

## 2.7 Core Strategy Policies and Objectives

The Assembly notes the inclusion of a number of objectives (CSO1- CSO15) that form part of the Core Strategy Chapter and specifically how it is proposed to implement the Core Strategy. This includes policy related to the preparation of local statutory plans, brownfield and infill lands, vacant and derelict sites, and enhanced coordination. Whilst these policies are considered positive additions to the Draft Plan, it is recommended that a number of overarching policy additions are included to support the delivery of the Core Strategy over the plan period. This includes policy provision that ensures that future development within the City is consistent with the provisions of the Core Strategy, alignment with the NPF and RSES, and whilst the content of Section 2.7.6 of the Draft Plan is noted, policy committed to monitoring the progress and implementation of the Core Strategy.

## 3.0 Climate Action

The Assembly welcomes the inclusion in the Draft Plan of a dedicated Chapter to support Climate Action which incorporates specific Climate Action policies (CA1, CA2, CA3, CA4) and objectives (CAO1, CAO2, CAO3) which support implementation of International and National objectives on climate action, transition to a climate resilient low carbon county, and alignment with the Climate Action Plan 2021 and the Dublin City Council Climate Action Plan (DCCCAP). Table 3.1 of the Plan sets out a holistic and integrated approach in demonstrating how each of the Chapters in the Plan contribute to Climate Change Adaptation or Mitigation, and further observations in this regard are set out in the following sections.

EMRA acknowledges and welcomes the number of achievements made to date including Dublin City Council’s role as lead authority for the Dublin region CARO, the development of the Dublin District Heating System (DDHS) in the Docklands/wider Poolbeg Peninsula and the implementation of Energy Performance Contracting, amongst others. In addition, economic opportunities arise in tackling climate change and the Plan cites the innovative and technological solutions available from renewable energy, sensor technologies and ‘Smart City’ solutions such as those being currently trialled by Smart Dublin.

The Assembly welcomes the Council’s adoption of the Dublin City Climate Change Action Plan, 2019 - 2024 (CCAP) which sets out the key targets and actions in the areas of energy and buildings, transport, flood resilience, nature-based solutions and resource management which in turn have guided the Council’s strategic approach to Climate Action. It is noted that the Draft Plan refers to the Climate Action Plan 2019 and related Policy CA1. All references should be updated to reflect the new Climate Action Plan 2021 (CAP 21) and the associated annex of actions should be reviewed as they relate to local authorities and sectoral emissions reduction targets. In particular, national targets propose to increase the proportion of renewable electricity generation to up to 80% as expressed in CAP 21. The final plan should also make reference to the actions proposed under the CAP including those related to Local Authority Renewable Energy Strategies and the upcoming revised Wind Energy Guidelines due for publication in 2023. The Plan also refers to the Offshore Renewable Energy Development Plan (OREDPP) 2014 and the Council is directed to its current review as OREDPP II is due to be completed and published later this year. Having regard to the above, the Assembly supports the inclusion of objective

CAO2 which relates to the variation of the development plan to reflect new guidance and legislation related to climate action and associated policy.

The Draft Plan states that Codema are preparing a 'Dublin Region Energy Master Plan' for Dublin Local Authorities that will develop evidence based and costed pathways for the Dublin region to achieve its carbon emission reduction targets to 2030 and 2050. This will support identification of Strategic Energy Zones and district heating opportunities in line with RPOs 7.35 and 7.38 of the RSES. The Assembly notes and welcomes the suite of policies to support district heating in the city focusing on the SDRAs and the identification of a Decarbonisation Zone at Ringsend/Irishtown with work progressing in collaboration with Codema and CARO on an implementation plan to harness a range of energy technologies and initiatives. In this regard, the Assembly supports the inclusion of Policy CA 18 of the Draft Plan that addresses Decarbonising Zones and the commitment to establish Decarbonising Zones in each LEA within the lifetime of this plan. This will also be informed by upcoming Section 28 Guidelines on district heating policy.

Having regard to the above, the Council are recommended to give consideration to the inclusion of additional detail outlining how Dublin City will contribute to the reduction of emissions and the renewable energy targets as outlined in CAP 2021, in accordance with the relevant section 28 guidelines including the Wind Energy Development Guidelines (2006) and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017).

The Assembly welcomes the inclusion of policy objective CAO3 in the Draft Plan that outlines the Council's support of EMRA in identifying a robust method for quantifying the relative GHG impacts of alternative spatial planning policies as part of the European Union ESPON 'QGasSP' research programme and acknowledgement of the need to develop appropriate mechanisms to monitor greenhouse gas emissions as part of upcoming Section 28 Development Plan Guidelines or other national Guidance, as appropriate. It is anticipated that outputs from the QGasSP project are expected in Q2 2022 that should assist in this area.

In terms of sustainable transport, the Assembly welcomes the integration of policies and objectives within the Draft Plan that support measures to influence the spatial pattern of development, urban structure and overall transition to sustainable mobility within the City in accordance with the Climate Action Plan. In particular, the Assembly welcomes the incorporation of key targets for modal share (outlined in Chapter 8) to address climate change through sustainable mobility. In terms of decarbonising transport, the policies supporting the contribution of electric vehicles to the green economy (CEE13) and the provision of sufficient charging points and rapid charging infrastructure for EVs on existing streets and in new developments and the overall expansion of the network (CA24, SMT27) are welcomed.

The Assembly welcomes Policy CA22 supporting a circular economy approach and it is considered that the Plan would benefit from reference to the potential and opportunities of the bioeconomy as supported by RPO 7.34 of the RSES.

The Assembly welcomes the Council's policy approach to flood and water resource resilience and natural flood risk mitigation through the use of Green Infrastructure and nature based solutions and which are further detailed within dedicated chapters within the Draft Plan.

## 4.0 Shape and Structure of the City

The Assembly welcomes the inclusion of this Chapter which sets out the overarching framework and strategy to guide the future sustainable development of the city. It is considered positive that the intent of this Chapter is to guide and manage the City's evolution to ensure that it develops in a sustainable and climate resilient manner in accordance with national and regional policy, and that high quality placemaking will be required.

The progress listed over previous plan periods is noted and includes the redevelopment of brownfield lands and consolidation of low intensity industrial sites, progress of the North Lotts and Grand Canal Dock SDZ Planning Scheme, redevelopment of the Grangegorman Campus, expansion and consolidation to the west and south west with the regeneration of large brownfield sites in the Liberties and at Heuston Station, including the redevelopment of the Clancy Army Barracks, regeneration of designated Strategic Development and Regeneration Areas (SDRAs) including Clongriffin-Belmayne, and the ongoing regeneration of significant regeneration sites including St. Michaels Estate, O'Devaney Gardens, Dolphin House and St. Teresa's Gardens.

The strategic approach outlined at Section 4.4 of the Draft Plan is a positive addition and references to the RSES and the Dublin MASP are welcome as part of this. This includes a focus on compact growth, consolidation of development through a focus on infill and brownfield sites, ensuring climate resilience and the transition to a low carbon economy, the creation of healthy communities, ensuring that the City's civic importance as the State's capital is reinforced and augmented through appropriate public realm and healthy placemaking interventions, and supporting and maintaining a strong economy in the City and providing a critical mass of development to support investment, innovation and the smart economy.

The Assembly welcomes the approach taken by the Council in detailing each of the key areas within the City including the Inner City, the Docklands and Dublin Port, the Inner Suburbs and Outer City. The supporting policy framework reinforces the strategic approach of the chapter and is in keeping with policy within the RSES and Dublin MASP. Policies that specifically mention the Dublin MASP, such as policy SC8, are positive additions to this Chapter.

The inclusion of Sections 4.5.3 and 4.5.4 of the Draft Plan, which detail density and building heights respectively, are important inclusions within the Plan. It is also noted that this section is supported by Appendix Three of the Draft Plan. Policy provided relating to urban density, compact growth, housing mix, green infrastructure, heights and landmark/tall buildings are noted and specific policy references to the RSES and Dublin MASP (SC 11) are welcome. The Assembly welcomes the approach of the Local Authority which seeks to ensure consistency with the relevant Planning Guidelines and deliver on key national and regional concepts such as compact growth, whilst recognising the appropriateness of context and the diverse character of the City. This is in keeping with Section 9.4 of the RSES on Healthy Placemaking (also a Key Principle of the RSES) which seeks to protect and enhance the unique identity and character of places.

## 5.0 Quality Housing and Sustainable Neighbourhoods

The Quality Housing and Sustainable Neighbourhoods Chapter presented as part of the Draft Plan is welcome and in particular that the Chapter is framed within the context of overarching national and regional policy. It is noted that the Draft Plan specifically references that the NPF and the RSES emphasise the importance of achieving compact sustainable growth and accelerated housing delivery while promoting people's quality of life through 'healthy placemaking'.



The Assembly notes the achievements outlined at Section 5.2 of the Draft Plan which includes a significant increase in the delivery of new housing with 7,078 dwellings completed in the Dublin City Council area between 2016 and mid- 2020. In addition, since 2015, over 7,500 public housing units have been delivered with another 11,491 units currently in the pipeline. It is also indicated that the Council has been successful in planning for new neighbourhoods and creating new communities at Ashtown-Pelletstown and Clongriffin-Belmayne in the city's northern suburbs and in North Lotts and Grand Canal Dock, through regeneration of the city's historic docklands area. In accordance with the provisions of the RSES and specifically section 5.4 and Table 5.1, and referencing the focus of further development at Clongriffin-Belmayne, it is recommended that the Draft Plan is strengthened to ensure provision of supporting infrastructure, facilities and employment opportunity in line with the RSES to provide a mixed-use district with retail and service provision. The Council's role in delivering and running community facilities and amenities, providing public realm improvements and enhancements, and delivering strategies and duties relating to disability, ageing, integration and travellers, is also noted.

Components of the outlined Strategic Approach reinforce the regional policy of the Assembly and are welcome inclusions in the Draft Plan. This includes, for instance, implementing the Core Strategy by supporting the sustainable development of the Dublin Metropolitan Area through the Dublin MASP and providing the right quantity, quality and type of housing at appropriate locations.

It is noted that Policy QHSN3 of the Draft Plan outlines the need to secure the implementation of the Dublin City Council Housing Strategy (contained at Appendix 1) in accordance with the provision of national legislation, and encourages that a wide variety of housing typologies and tenures is provided throughout the city in line with the provisions of the HNDA. Section 5.5.6 and 5.5.7 of the Draft Plan also relate. In line with the comments contained at Sections 2.2, 2.4 and 2.6 of this submission, and in order to strengthen the Draft Plan, it is recommended that Dublin City Council give consideration to the inclusion, within volume 1, of a clearly presented summary of the entire housing need in Dublin City, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the city over the plan period. Furthermore, and notwithstanding the provisions of Section 5.5.7 of the Draft Plan and the related policy provision, it is considered that the Draft Plan could be strengthened through the inclusion of an evidence-based rationale for determining the location of build to rent schemes within the City.

The Assembly also notes policy provision centred on regeneration, compact growth and densification that includes tackling vacancy and promoting active land management. This is considered to be in keeping with the Healthy Placemaking principle of the RSES and specifically RSOs 1, 2, 4 and 5. Inclusion of the 15 Minute City Concept as part of the Draft Plan (QHSN10) is also positive and reflective of the Guiding Principles of the RSES contained at Section 8.3 and guidance related to the strategic location of residential development at Section 9.3 of the RSES.

Chapter 9 'Quality of Life' of the RSES supports numerous policies and objectives contained within this Section of the Draft Plan. This includes those related to Social Inclusion, provision of housing for all people including older people and those with disabilities, and social and community infrastructure. As part of this, in accordance with Section 9.6 of the RSES, the Assembly consider it necessary that the Plan ensures that social and community infrastructure can be adequately provided in a manner that supports the growth of Dublin City as envisioned in the RSES and NPF.

## 6.0 City Economy and Enterprise

The Economic Development Chapter presented as part of the Draft Plan is welcomed by the Assembly. In particular the reuse of figure 6.3 of the RSES 'Economic Strategy', is a positive addition and the Assembly supports the inclusion of the overarching policy framework outlined. This includes reference to the NPF and RSES and, in particular, that the RSES emphasises the need to increase employment in strategic locations, to provide for people-intensive employment at sustainable locations near high quality public transport nodes, to build on commercial and research synergies in proximity to large employers, industry clusters and smart specialisation and to activate strategic sites to strengthen the local employment base in commuter towns.

Likewise, the Draft Plan references that the Metropolitan Area Spatial Plan (MASP) for Dublin (as set out in Chapter 5 of the RSES) identifies the need for increased employment densities within Dublin City and suburbs, near high quality public transport nodes, third level institutes and existing employment hubs, and for the relocation less intensive employment uses outside the M50 ring.

Reference throughout the Chapter to the Local Economic and Community Plan (LECP) is a positive inclusion within the Plan (section 6.5.4 of the Draft Plan). The Regional Assembly has a statutory role in overseeing the preparation of LECPs and is mindful of the upcoming review period of the Dublin LECP. In this regard, the inclusion and reference to the LECP as part of the Draft Plan is a positive addition and reflects a number of RPOs included in the RSES such as RPOs 9.18 and 9.19.

The strategic approach of the Chapter as set out at Section 6.4, and developed in the following sections of the Draft Plan, is considered to address a number of economic issues that impact Dublin City. The Assembly welcomes a number of policy inclusions that are considered to reinforce the RSES such as Policies CEE1-6 that promote Dublin City as the national economic engine in line with RSO 14 of the RSES (Dublin as a Global City Region), Policy CEE 5 to build and promote the Dublin-Belfast Economic Corridor, Policies CEE 12-14 that reinforce climate action, quality of place and the green and circular economy, addressing regeneration and vacancy through policies CEE19 and 20, and support for Dublin Port at policy CEE35.

Section 6.5.2 of the Draft Plan addresses Strategic and Targeted Employment Growth. The Assembly welcomes the inclusion of Table 6-1 within the Draft Plan which supports the Strategic Employment Development Areas as listed in Table 5.2 of the MASP within the RSES. It is considered that policy CEE7 of the Draft Plan is in keeping with RPO 5.6 of the RSES which states that the development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors. In this regard the updating of the Core Strategy in accordance with the recommendations contained at Section 2.6 of this submission would further reinforce and ensure consistency with the RSES.

Sections 6.4 and 6.5 of the RSES identifies the Region's economic engines, sectoral opportunities and key sectors. The Assembly welcomes the breadth of policy contained at Section 6.5.6 of the Draft Plan which identifies key economic sectors, many of which are in keeping with those specified within the RSES. This includes new growth sectors and innovation including the need to shift to a climate resilient, low carbon green and circular economy which is in keeping with RPO 6.23 of the RSES. Likewise, policies CEE22 and 23 of the Draft Plan that support the growth of innovative new growth sectors relating to the digital transformation, Artificial Intelligence (AI) and support for the Smart Dublin Initiative are all in keeping with the RSES including RPO 6.30.

## 7.0 The City Centre, Urban Villages and Retail

Dublin City Centre is acknowledged as the prime retail destination for the Country; the retail sector being a significant contributor to the city's economy, and which is supported by vibrant street scenes, public spaces, and a varied cultural and leisure offer. The Draft Plan recognises that changes in economic conditions, technological advances, retail trends, changing consumer behaviour and the impacts and changes brought about by the Covid-19 pandemic have and continue to result in new patterns of work and lifestyles. In response, the chapter sets out policies and objectives to support the city centre to adapt and evolve to these trends, which are welcomed.

This chapter is supported by the preparation of a retail strategy having regard to the Retail Planning Guidelines (2012) and is set out in Appendix 2 of the Draft Plan. The City Retail Hierarchy is set out in Table 2 of the Retail Strategy and is consistent with the Retail Hierarchy set out in Table 6.1 of the RSES. The stated purpose of the retail hierarchy is to indicate the level and form of retailing activity appropriate to the various centres across the city and in doing so, to protect each centre's vitality and viability, while allowing each centre to perform its role within the hierarchy. The hierarchy emphasises the primacy of the City Centre as a Level 1 Metropolitan centre, and a number of Level 3 Key Urban Villages, Level 4 Urban Villages and Neighbourhood Centres and Level 5 Corner/Local Shops, as appropriate to their level of retail service provision.

The Assembly acknowledges that the Retail Planning Guidelines for Planning Authorities (2012) require updating and note Policy CCUV01 to review the City Retail Strategy subsequent to the completion of any superseding Guidance or updated Regional Retail Strategy.

The Assembly welcomes the detailed strategy to support the city centre set out in Section 8 of the Retail Strategy in response to challenges accelerated by the Covid-19 pandemic and the supportive policies for the development/consolidation/regeneration of key urban villages through high density mixed use development and residential led intensification. This policy response aligns with RPO 4.3 of the RSES and the Guiding Principles for the growth of the Dublin Metropolitan Area as set out in the MASP that supports consolidation and re-intensification to provide high density and people intensive uses in the right places.

In addition, the efforts made by the Council to develop new and enhanced experiences in the city to diversify the city centre offer are welcomed (Policy CCUV17), with policy supports for food and beverage sector markets, the evening and night time economy and the comprehensive suite of policy supports for the public realm to contribute to cultural vibrancy, active travel and healthy streets, and greening the city (Sections 7.5.6-7.5.8).

The Assembly supports the continued roll out of measures to improve accessibility and permeability in the city's public realm (Policies CCUV38, CCUV39) including objectives to link office and culture clusters to the retail core (Objective CCUV018), to support walking and cycling in response to ongoing COVID impacts including a shift towards home-working, as well as opportunities to facilitate co-working and remote-working spaces in key district centres and urban villages (Policy CCUV24).

The Eastern and Midland Regional Assembly carried out analysis to identify which urban centres are most exposed to economic disruption due to the COVID-19 pandemic, as well as an economic analysis of co-working spaces to inform targeted supports and investment, and these publications can be found on at [www.emra.ie](http://www.emra.ie).

## 8.0 Sustainable Movement and Transport

The Regional Assembly welcomes the Council's stated commitment in this Chapter and accompanying Appendix 5, to promote the integration of land use and transportation, to improve public transport and active travel infrastructure with an increased shift towards sustainable modes of travel. There is

also an increased focus on public realm and healthy placemaking, while tackling congestion and reducing transport related CO2 emissions, which is welcomed.

In particular, the Assembly welcomes Policy SMT1 to continue to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth. In addition, Policy SMT3 supports and promotes the sustainability principles set out in National and Regional documents for an integrated transport network and the Assembly welcomes that this policy advocates the guiding principles set out in Section 8.3 of the RSES which were developed in conjunction with NTA and other agencies. The Assembly also notes upcoming Section 28 Guidelines which will inform Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on connectivity and ease of movement for sustainable modes and place making (Action 255 CAP21 as per Annex of Actions).

A modal shift to sustainable transport will be facilitated by the delivery of key sustainable public transport infrastructure projects (Policy SMT20) including the Metrolink, BusConnects, Dart+, the Luas Expansion Programme and improvements to the Greater Dublin Area Cycle Network (Policy objective SMT08) including proposed new pedestrian/cycle connections (SMT024-SMT028). It is considered that Policy SMT20 should reference support of the bus and rail projects in accordance with the review of the NTA's Transport Strategy for the GDA (for policy consistency as per Policy SMT28 Road Projects). The Assembly welcomes the promotion of the Council to the use of Transport Assessments and Travel plans to optimise the benefits of public transport infrastructure and supports for walking and cycling to bring about behavioural change as advocated by RPO 8.7 of the RSES. The Assembly also notes and welcomes Policy SMT22 that promotes shared mobility and adaptive infrastructure for the changing modal environment including micro-mobility.

The Assembly welcomes Policy SM21 that supports a co-ordinated approach with the transport agencies to improving the rail network including the needs of freight transport. The Council is also directed to RPO 8.12 that supports the delivery of a higher speed rail connection between Belfast and Dublin and Cork. This is currently under review by the Government's Strategic Rail Review consultation. Additionally, the Council is directed to RPO 8.11 which supports the improvement, protection and strategic function of the Dublin-Belfast Corridor as part of the EU TEN-T network. It is recommended that a complementary policy for the Dublin-Belfast Corridor and recognition of the strategic function of the Dublin to Belfast road network be included in this chapter which supports and cross references Policy CEE5 as provided in Chapter 2 in the Draft Plan. The Assembly also welcomes the Council's support to national road projects to improve access to and support the continued development of Dublin Port including the Southern Port Access route (Policy SMT28) to ensure the role of Dublin Port as a key economic resource for the city (CEE35) and aligning with RPOs 8.21 and 8.23 of the RSES.

Policy objective SMT015 is noted that promotes 'Park and Ride' services at suitable locations in co-operation with neighbouring local authorities. The Council is directed to RPO 8.14 and Table 8.5 of the RSES that supports delivery of strategic park and ride projects which include Finglas and Naas Road, and other locations under review by the NTA as part of the review of the National Transport Strategy for the GDA. The Council is directed to Action 260 of the CAP 21 which proposes implementation of the NTA's Park and Ride Strategy for the GDA in Q1 2022 which should further inform decision making in this area.

The Assembly welcomes the proactive approach and progress that has been made by the Council in improving walking and cycling infrastructure in the city as part of the accelerated measures in response to the COVID-19 pandemic. The continuance of this approach is welcomed, as set out in Policy SMT07 that proposes to review the temporary pedestrian and cycling measures with a view to permanent implementation. These measures should include provision for older people, people with disabilities and young children in line with the principles of universal design and incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified. Policy SMT11 is noted in this regard that aims to enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm. The Council is also directed to Action 231 of CAP 21 which requires each local authority to assess their road network and identify where additional space can be reallocated to pedestrians and cyclists to continue the improvement and expansion of the active travel and greenway network.

## 9.0 Sustainable Environmental Infrastructure and Flood Risk

The Chapter sets out policy supports for climate action including promoting water conservation, providing adequate wastewater treatment, managing surface water in a sustainable manner, minimising waste in accordance with the principles of the circular economy and providing flood protection measures and reduce flood risk as far as possible in the City. The Draft Plan recognises that climate change is a significant ongoing challenge to the sustainable management of water resources for Dublin City. Addressing the overloading of the city's drainage network, coupled with excessive water wastage and demand, are central to sustainably managing demand in line with the Water Quality and Water Services Infrastructure Climate Change Sectoral Adaptation Plan (2019).

The Assembly welcomes the policies and objectives to support and work in partnership with Irish Water in accordance with national plans and strategies including the National Water Resources Plan 2021. There is a strong commitment in the Draft Plan to facilitate the timely delivery of the strategic public water and wastewater infrastructure projects (as described in the accompanying Infrastructure Capacity Assessment) required to realise the core strategy growth targets for the city as supported by RPOs 10.2 and 10.3 of the RSES.

The Assembly further welcomes the Council's commitment to examine the potential for strategic management, restoration and enhancement of the city's watercourses as a policy response to the Water Framework Directive, the Local Government (Water Pollution) Act 1977 (as amended), the River Basin Management Plan and National urban renewal policies. The preparation of River Corridor Restoration Strategies for the city's watercourses aim to develop a long term, integrated and interdisciplinary approach to linking the restoration of the city's rivers and tributaries to land use planning, urban regeneration, climate adaptation and the provision of ecosystem services such as flood management, habitat provision and pollution control. The approach will also support RPO 7.15 and 7.26 of the RSES in terms of taking opportunities for biodiversity and amenity enhancement and achieving appropriate riparian setbacks in these areas. These strategies also aim to improve water quality and ecology in line with the requirements of the Water Framework Directive, River Basin Management Plan and climate change adaptation which is welcomed.

The Assembly welcomes the policies and objectives that support the principles of the circular economy, and the implementation of best practice in relation to waste management in the city in accordance with the requirements of The Eastern Midlands Regional Waste Management Plan 2015–2021 (EMRWMP), and future update expected in 2022, as outlined by RPO 10.25 of the RSES. The

Council is also directed to the potential and opportunities of the Bioeconomy as supported by RPO 7.34 of the RSES.

The Draft Plan makes reference to ensuring an integrated and precautionary approach to managing the projected impacts of coastal change (caused by increasing development pressures and erosion, sea level rise and increased storm frequency linked to climate change) on the city's coastal communities, infrastructure, heritage and environment. In terms of coastal resilience, the attention of the Council is drawn to Integrated Coastal Zone Management (ICZM) supported by RPO 7.3 of the RSES, as a coherent policy for the sustainable management of all aspects of the coastal zone.

In relation to air and noise pollution, the Council has adopted an 'Air Quality Management Plan and the 'Dublin Agglomeration Environmental Noise Action Plan' and has made a commitment in the Draft Plan of maintaining and managing a Dublin City ambient air quality monitoring network in real time under the direction of the Environmental Protection Agency which is welcomed.

The Draft Plan also includes policy objectives to facilitate the provision of strategic energy infrastructure and telecommunications infrastructure, including broadband connectivity and other technologies, within the City. The Assembly supports the development of a 'Dig Once' code of practice (Policy objective SIO25) to ensure that digital connectivity infrastructure is delivered in a strategic and sustainable way and the Council is directed to additional sustainable guiding principles for the provision of energy networks which are set out in Section 10.3 the RSES.

A Strategic Flood Risk Assessment (SFRA) was undertaken of the Draft Plan area having regard to the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities and is set out in Volume 7 of the Draft Plan. A two-stage assessment of flood risk was undertaken, to identify flood risk and an initial flood risk assessment. The SFRA carried out flood risk area assessments and produced Justification Test tables for 32 areas within the city providing guidance for development within these areas. These are accompanied by Flood Zone Maps which highlight the areas of flood risk concern including Flood Zones A and B. It is stated in the SFRA Review that outputs from future studies (including Flood Relief schemes for Dodder Phase 3, the Camac and others) and datasets should be incorporated into any update of the SFRA.

The Regional Assembly welcomes the Council's commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner, including through the fora of RSES and MASP Implementation Groups.

## **10.0 Green Infrastructure and Recreation**

The Assembly welcomes the inclusion of a dedicated Chapter on Green Infrastructure (GI) and Recreation, and the recognition given to GI as a critical enabler in making Dublin a climate resilient, healthy and green city. Also welcomed is the integration of a green infrastructure and ecosystem services approach into new developments / new growth areas in the city (Policy G16) and the role of ecosystems services which is clearly defined and explained in the Draft Plan.

The Draft Plan indicates the intention to prepare a 'Green Infrastructure Strategy' for Dublin City that will include a newly developed set of green micro areas. It is also recognised that a co-ordinated and managed network of multifunctional green spaces linked to the wider regional GI network (as per RPO

7.23 of the RSES) will be required to ensure ecosystem functions are maintained and enhanced. In this regard, the attention of the Council is brought to the GI policies in Section 5.9 of the MASP and Table 7.1 Strategic Natural Cultural and GI Assets in the Region. The Assembly further welcomes the policies and objectives set out in the Draft Plan to support, protect and enhance the city's landscape and seascape, and the strategic green and blue networks, such as Dublin Bay, the Phoenix Park, the Dublin Mountains and the metropolitan and local greenways.

In addition, the Council is directed to Section 7.7 of the RSES which sets out Guiding Principles for local authorities in the preparation of Green Infrastructure Strategies. To enhance knowledge and expertise in this area, EMRA is currently participating in an INTERREG funded project – PROGRESS – with the objective of promoting improved governance for regional ecosystem services across 6 European regions. This involves working with regional stakeholders to identify and share Good Practices from the partner regions for inclusion on the Interreg Europe Policy Learning Platform. A project Action Plan is currently being developed and a Pilot Action is also currently testing a Green Infrastructure Decision Support Mapping Approach for Ecosystem Services and Green Infrastructure (case study is Dún Laoghaire-Rathdown County Council). It is anticipated that the outputs and learnings from the project will be transferable to the rest of the DMA local authorities.

The Assembly welcomes the strong commitment within the Draft Plan to biodiversity which underpins and is integral to maintaining the integrity of a GI network and the city's resilience to climate change impacts. The recognition given in the Draft Plan to the Dublin UNESCO Biosphere and related marine policies and objectives for the coastal zone and protection and management of Dublin Bay, and supportive policy for wildlife corridors of the rivers and canals, and of protected sites, are welcomed. In addition, the Assembly welcomes the policy supports that contribute to Climate Action such as those related to and not limited to the Resilient Urban Forest, Greening Strategies, All Island Pollinator Plan, Proposed Urban Tree Canopy Plan, Urban Farming and the new Dublin City Council Green and Blue Roof Guide 2021 (provided in Appendix 11).

The Assembly welcomes the strong policy supports for parks/open spaces, sport, recreation and play set out in the Draft Plan, in addition to the inclusion of Figure 10-5 identifying strategic Public Rights of Way (PROW) in the city. Many of these PROW incorporate/ will incorporate Metropolitan Greenways thereby promoting and enabling wider regional recreation and tourism objectives and also sustainable travel modes. These will contribute to supporting national policy and objectives for health and wellbeing as advocated in RPO 9.16 of the RSES. The Assembly commends the commitment of Dublin City Council to the principles of sustainable development and GI and looks forward to continued engagement with the Council to support the delivery of strategic GI, in line with the policy objectives of the RSES and MASP.

## **11.0 Built Heritage and Archaeology**

The Council recognises that the development plan plays a key role in valuing and safeguarding built heritage and archaeology through guiding decision-making and implementation of national legislation. A key objective is to implement and build on the success of the Dublin City Heritage Plan 2002-2006 along with the outcomes of the current City Heritage Plan Review 2021 and promote the role of heritage in fostering creative places that meet local needs and aspirations. The Assembly welcomes the suite of policies and objectives set out in the Draft Plan to enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets and ensure their preservation into the future. The chapter is supported by the Record of Protected Structures in Volume 4 and Appendix 6 provides a list of the Architectural Conservation Areas and Monuments in the city and historic street surfaces and features.

The Assembly welcomes the strong commitment in the Draft Plan to the different built heritage assets in the city including policies to support and enhance conservation areas, maritime heritage, twentieth century buildings and industrial and archaeological heritage. In addition, the Assembly welcomes the policies to support the rehabilitation and reuse of existing older buildings and overall heritage led regeneration in the city. In this regard the RSES emphasises the benefits of heritage led urban regeneration for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of cultural or natural interest, which can play a key role in driving tourism and economic development in terms of placemaking and enhance the vibrancy of historic centres.

The Assembly in particular welcomes the new dedicated section in this chapter on retrofitting, sustainability measures and climate change. This is supported by Policy BHA23 which aims to co-operate with other agencies in the investigation of climate change on the fabric of historic buildings and to enhance adaptive capacity, strengthen resilience and reduce the vulnerability of heritage in line with the National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2020). The Council is also directed to the annex of actions in the Climate Action Plan 2021 as they relate to heritage properties, in particular the proposed outputs of Action 205 regarding climate proof planning procedures for heritage properties including upcoming Guidelines on resilience of heritage resources under current climate conditions.

## 12.0 Culture

The Assembly welcomes this dedicated chapter to Culture in recognition of the importance of culture as an essential part of place making and in delivering an enhanced quality of life to Dublin City. It is also recognised as a key driver for the economy as advocated in the RSES (RPO 9.24) and the RSES also identifies Dublin City as a hub for higher order culture and leisure.

The Draft Plan sets out policies and objectives which aim to ensure that culture infrastructure is valued and protected as an integral part of the fabric of the city and this includes protecting and enhancing the city's cultural assets and institutions along with the cultural hubs and quarters on the north and south side of the city.

The Assembly welcomes the attention given to supporting cultural vibrancy within the city through the protection of existing cultural uses and encouragement of new cultural uses including those impacted by the Covid pandemic (CU13), the regeneration opportunities presented by cultural uses on for example former industrial and unused lands and vacant spaces (CU14, CU116, CU025) and on quieter side streets (CU15) which closely align with RPOs 9.25 and 9.27 of the RSES. The Draft Plan also advocates the support of key cultural activities such as Art, Music and the Visual Arts, which are welcomed. In addition, the role of cultural activity in evening and night time, to support the city's vitality is significant and the suite of supportive policies to enhance the night time economy are welcome which are further developed in Chapter 7 of the Plan.

## 13.0 Strategic Development Regeneration Areas

The Assembly welcomes the dedicated chapter to Strategic Development Regeneration Areas (SDRAs) which sets out a framework and guiding principles for the City's 17 designated SDRAs. This chapter complements the policies set out in Chapter 6 for Regeneration and Vacancy (Section 6.5.5) which recognises the importance of expedient redevelopment of extensive vacant/under-utilised sites that are critical to sustainable development.



The Plan states that these SDRA areas are capable of delivering significant and sustainable quantities of homes and employment for the city and will be a key element of delivering compact growth as outlined in the Draft Plan's Core Strategy. This aligns with the RSES which advocates consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City (RPO 4.3). In this regard the Council is directed to review consistency with the Guiding Principles set out in the RSES for infill and brownfield development, at Chapter 3 Growth Strategy and Chapter 5 MASP, specifically Section 5.3 which outlines the Guiding Principles for the growth of the Dublin Metropolitan Area.

It is noted that some of the SDRAs listed in the City Plan are locations identified as Strategic Residential and/or Employment Development Areas in Tables 5.1 and 5.2 of the MASP including the Docklands, Parkwest-Cherry Orchard, Ballymun, St. James, Nass Road, Grangegorman and Clongriffin-Belmayne. The Council shall also ensure that the development of these lands and any future lands within these areas are consistent with RPOs 5.4, 5.5, and 5.6 of the RSES which support compact sustainable growth, accelerated housing delivery and re-intensification of employment lands in the Dublin Metropolitan Area. Table 5.1 in the MASP may provide further guidance on the phasing and infrastructure requirements of identified strategic development areas within the MASP.

The Assembly further welcomes the 'Overarching Principles' and cross referencing to Chapter 15 which outlines key design principles including healthy placemaking which is a key principle of the RSES.

## 14.0 Other

Chapter 14 Land Use Zoning sets out the general land-use and zoning policies and objectives of the Draft Plan and which have been informed and derived from the Draft Plan's Core Strategy. Chapter 15 Development Standards sets out the standards and criteria to be considered in the development management process and provides a comprehensive framework for the assessment of planning applications in the City. The Assembly welcomes that the guidance provided in this chapter has been informed by the NPF and RSES. The NPF and RSES encourage and support the densification of existing urban areas and promote the use of performance-based criteria in the assessment of developments to achieve well designed and high quality outcomes.

The Draft Plan provides new guidance "Thresholds for Planning Applications" under Table 15.1 identifying the required analysis and reports to support a comprehensive planning application for submission to the Planning Authority. The chapter also provides clear guidance on key design principles; notably healthy placemaking, inclusivity and accessibility, green infrastructure and landscaping and climate action, including new requirements for Climate Action Energy Statements for applications over a certain residential and/or commercial threshold, which is welcome. The Assembly also welcomes the dedicated section on play infrastructure and reference to the Draft City Play Strategy "Pollinating Play" 2020-2025 which provides guidance on play spaces in the City.

The inclusion of a dedicated chapter to monitoring and implementation is welcomed (Chapter 16) as is the stated intention that Dublin City Council will continue to engage and regularly report to the Regional Assembly, setting out progress made in supporting the objectives of the RSES and the MASP in accordance with Section 25A (1) of the 2000 Planning and Development Act (as amended).

The Assembly welcomes the preparation of a "Development Plan Core Strategy Monitoring Report" on the City Performance Indicators, in addition to the required two-year development plan progress report. Table 16.1 sets out the City Performance Indicators which have evolved and advanced from the current plan's performance indicators and should be a key mechanism in assessing the delivery of the housing and population targets set out in the core strategy and will help inform the two-year progress report. The Assembly welcomes the inclusion of these monitoring mechanisms to ensure effective delivery of the City's development plan and for greater transparency on the progress made in its implementation.

The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and which may provide additional support in monitoring the delivery of local authority development plans.

## 15.0 SEA, AA and SFRA

The Assembly welcomes the preparation of the Draft Plan in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA environmental report sets out the iterative process to date including an assessment of the overall environmental effects arising from the Draft Plan provisions. Taking into account the integration of various recommendations and mitigation measures arising from the SEA, AA and SFRA processes into the Draft Plan, which are detailed in the environmental report, it was determined that significant residual adverse environmental effects will not occur through implementation of the Draft Plan.

The Draft Plan is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It is concluded following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts associated with the Draft Plan, that the Draft Plan will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the Plan.

A Strategic Flood Risk Assessment (SFRA) has been undertaken alongside the preparation of the Draft Plan, the SEA and the NIR. The SFRA is required by 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. The recommendations from the SFRA have been integrated into the Draft Plan, as discussed under Chapter 9 above.

## Conclusion

It is considered that the Draft Dublin City Development Plan, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the Draft Dublin City Development Plan 2022-2028, which marks the beginning of the alignment of planning policy at city and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcomes further opportunities to engage in the statutory process of the making of the Dublin City Development Plan.

Regards,



Jim Conway  
Director  
Eastern and Midland Regional Assembly  
11<sup>th</sup> February 2021