

Proposed Variation No.6 to the Dublin City Development Plan 2022 –2028

The Eastern and Midland Regional Assembly notes the publication of Proposed Variation No. 6 to the Dublin City Development Plan 2022-2028 and sets out hereunder observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 12th September 2025.

1.0 Overall Context

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

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024 (as amended by the Planning and Development (Amendment) Act 2025). However, the relevant provisions of the Planning and Development Act 2024, as amended, have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

Under Section 27C of the Planning and Development Act 2000, as amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions/observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator.

A submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft Variation of the development plan, and its core strategy, is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the Proposed Variation of the development plan and its core strategy is 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 it is consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matter along with recommendations as required under Section 27C of the Planning and Development Act 2000, as amended.

2.0 Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region which was made by the Members of the Assembly in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision of the RSES is supported by sixteen Regional Strategic Outcomes (RSOs), that are aligned with National Strategic Outcomes of the National Planning Framework (NPF) and framed around the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES, as the succeeding tier of policy delivery in Ireland, is of critical importance for the delivery of Project Ireland 2040.

The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. In line with the provisions of the Planning and Development Act 2000, as amended, the planning authority shall ensure, when making a Variation to the development plan, that it is consistent with the RSES for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, the Regional Assembly welcomes the proposed Variation to the Development Plan.

3.0 Proposed Variation No. 6

Dublin City Council (DCC) has published Proposed Variation No. 6 seeking to vary the Dublin City Development Plan (CDP) 2022-2028 in respect of the following:

It is proposed to vary the Dublin City Development Plan 2022-2028, by changing the land use zoning objective pertaining to lands at One Royal Canal House, Royal Canal Park, Pelletstown, Dublin 15:

From: Zoning Objective Z1 ‘Sustainable Residential Neighbourhoods’ - To protect, provide and improve residential amenities.

To: Zoning Objective Z3 ‘Neighbourhood Centres’ - To provide for and improve neighbourhood facilities.

Reason: One Royal Canal House is zoned Z1 (Sustainable Residential Neighbourhoods) in the current Dublin City Development Plan. To better reflect and support the operational and permitted office use at this location and, thereby in turn, support the commercial core at Royal Canal Park, it is proposed to vary the zoning objective at One Royal Canal House from Z1 to Z3.

3.1 Location and Description of the Subject Lands

One Royal Canal House is an office building located in Royal Canal Park in Pelletstown, Dublin 15. Royal Canal Park is a newly developed neighbourhood located to the east of Ashtown, to the west of Dublin Industrial Estate/Broombridge, to the south of the River Tolka and to the north of the Royal Canal and the Maynooth Rail line. One Royal Canal House lies to the north of Spindrift Avenue and to the west of the Ratoath Road. One Royal Canal House comprises a purpose-built office building and attendant grounds. The building is in use as the corporate headquarters of the Ballymore Group. The area is served by the new Pelletstown Railway Station and by local bus services.

3.2 Purpose of the Proposed Variation

The predominant zoning at Royal Canal Bank is residential - Z1 (Sustainable Residential Neighbourhoods)- and this reflects the primarily residential nature of the area.

Along the north and south of Spindrift Avenue the lands are zoned primarily Z3 (Neighbourhood Centres), and this reflects the commercial neighbourhood centre / mixed use nature of the street. One Royal Canal House comprises an operational office building permitted under Reg. Ref. 3414/04. It extends to over 2,000 sqm of office space over 5/6 floors. It fronts onto Spindrift Avenue, is located adjacent the mixed use area along Spindrift Avenue and forms part of the neighbourhood centre.

One Royal Canal House is zoned Z1 (Residential Neighbourhoods) in the current Dublin City Development Plan. To better reflect and support the operational and permitted office use at this location and, thereby in turn, support the commercial core at Royal Canal Park, it is proposed to vary the zoning at One Royal Canal House from Z1 to Z3. Under the current Dublin City Development Plan 2022 –2028 ‘office’ is a ‘permissible use’ on Z3 lands and the development plan does not set a limit on office floor space in a neighbourhood centre.

3.3 Background to the Proposed Variation

The Residential Zoned Land Tax (RZLT) was introduced in the Finance Act 2021. The objective of the tax is to activate land that is serviced and zoned for residential use or mixed use, including residential use, in order to increase housing supply and to ensure regeneration of vacant and idle lands in urban locations. Lands subject to the tax have been identified through a local authority led mapping exercise, associated consultation and an appeal mechanism through An Bord Pleanála (An Coimisiún Pleanála). The DCC annual draft map for 2025 was published on 1 February 2024 ahead of the publication of the revised final map in January 2025. Landowners, in addition to being able to make submissions on the map, had an extended opportunity to request the rezoning of land appearing on that map. One Royal Canal House is identified as in scope for the tax on the DCC annual draft RZLT Map for 2025 and 2026. The landowner requested in 2024 that the lands be rezoned from Z1 (Sustainable Residential Neighbourhoods) to Z6 (Employment/Enterprise) to better reflect the existing office use at the address. In 2024 Dublin City Council received 4 rezoning requests as part of the RZLT process. Having evaluated all requests for rezoning, it is proposed to rezone One Royal Canal House, from Z1 (Sustainable Residential Neighbourhoods) to Z3 (Neighbourhood Centres), for the reasons outlined in Section 3.2 above.

3.4 Consistency with the Dublin City Development Plan 2022-2028

The 2022 –2028 Dublin City Development Plan and in particular, the Core Strategy (see Chapter 2) sets out the spatial framework for the city and promotes ‘compact growth’ within the context of the National Development Plan (NDP), National Planning Framework (NPF), the National Climate Action Plan (CAP) 2024, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019, the NTA’s Greater Dublin Area Transport Strategy 2022-2042, with the Specific Planning Policy Requirements (SPPRs) set out in the relevant Section 28 Ministerial Guidelines and the National Marine Planning Framework.

The impact of the proposed rezoning on the overall strategy for the proper planning and sustainable development of the city has been considered by Dublin City Council. Dublin City Council has concluded that the Proposed Variation to the zoning of One Royal Canal House from Z1 to Z3 would not affect the residential yield of the core strategy/ population targets for the city, on the basis that One Royal Canal House is not available for residential development and was not available for residential development at the time of the preparation of the development plan. In addition, effective density, land use and urban consolidation objectives, as set down in previous statutory plans, have been achieved at Royal Canal Park.

Dublin City Council considers that the proposed rezoning is therefore generally consistent with the objectives and core strategy of the Dublin City Development Plan 2022-2028 and is consistent with national and regional planning policy / objectives / planning guidelines, and that the Proposed Variation and other parts of the development plan will continue to be internally consistent. For these

reasons, Dublin City Council considers that the Proposed Variation is in accordance with the proper planning and sustainable development of the area.

4.0 Submission

The Regional Assembly acknowledges Proposed Variation No. 6 of the Dublin City Development Plan (CDP) 2022-2028, which seeks to change the land use zoning objective pertaining to lands at One Royal Canal House, Royal Canal Park, Pelletstown, Dublin 15:

From: Zoning Objective Z1 'Sustainable Residential Neighbourhoods' –

'To protect, provide and improve residential amenities.'

To: Zoning Objective Z3 'Neighbourhood Centres' –

'To provide for and improve neighbourhood facilities.'

It is noted that Dublin City Council considers that the proposed change from a Z1 to a Z3 zoning objective would not affect the residential yield of the core strategy/ population targets for the city and that the proposed rezoning is generally consistent with the objectives and core strategy of the Dublin City Development Plan 2022-2028 and is consistent with national and regional planning policy / objectives / planning guidelines, and that the proposed variation and other parts of the development plan will continue to be internally consistent.

The Regional Spatial and Economic Strategy (RSES) sets out 16 Regional Strategic Outcomes (RSOs) which are aligned with national policy, specifically the National Planning Framework. These are cross referenced and aligned with the three key principles of the RSES; Healthy Placemaking, Climate Action and Economic Opportunity. The most relevant RSO which supports the proposed variation is RSO 2, 'Compact Growth and Urban Regeneration', which is to *'promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choices for the Region's citizens'*. This aligns with National Strategic Outcome 1 of the National Planning Framework.

The Assembly considers that the proposed change from Z1 to Z3 reflects established office use within a neighbourhood centre beside Pelletstown Station (i.e., a people-intensive use in a serviced, built-up location). As such the Proposed Variation compliments Regional Policy Objective (RPO) 4.3 in the RSES which seeks to *"support the 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 and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects."*

Given the built-in headroom figures contained in the current Dublin City Development Plan it is considered that the Proposed Variation will not have a material impact on the core strategy of the Dublin City Development Plan 2022-2028 from a housing delivery perspective. The Proposed Variation will align with RSO 2 and RPO 4.3 of the RSES for the Eastern and Midland Region 2019-2031 as it relates to Dublin City and the wider Metropolitan Area.

Accordingly, the Regional Assembly does not have any objection to the Proposed Variation No. 6 of the Dublin City Development Plan 2022-2028 as placed on public display.

5.0 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

The Proposed Variation underwent a screening for Strategic Environmental Assessment (SEA) and concluded that the proposal does not require a Strategic Environmental Assessment as it would not be likely to result in significant effects on the environment, taking account of the relevant criteria set out in Schedule 2A of the Planning and Development Regulations 2001 (as amended).

A screening for Appropriate Assessment (AA) was also carried out and concluded that the Proposed Variation will not have any likelihood for significant effects on any European sites, either alone or in combination with other plans or projects. The AA screening therefore concluded that it is not considered necessary to undertake any further stages of the Appropriate Assessment process. The Proposed Variation does not therefore require an Appropriate Assessment or the preparation of a Natura Impact Report (NIR).

Furthermore, a Strategic Flood Risk Assessment (SFRA) for the Proposed Variation was undertaken and prepared in accordance with The Planning System and Flood Risk Management -Guidelines for Planning Authorities (DEHLG and OPW, 2009) and Circular PL2/2014. The Flood Risk Identification (Stage 1) concluded that there are no fluvial, pluvial or tidal flooding or surface water management issues within or adjacent to the relevant lands and consequently a Stage 2 SFRA (initial flood risk assessment) is not required.

6.0 Conclusion

It is considered that the Proposed Variation No. 6 to the Dublin City Development Plan 2022-2028, is consistent with the Regional Spatial and Economic Strategy 2019-2031, having regard to the observations outlined above.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
12th September 2025