

Proposed Variation No.7 to the Dublin City Development Plan 2022 –2028

The Eastern and Midland Regional Assembly notes the publication of Proposed Variation No. 7 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 It should be noted that this legislation has been superseded by the Planning and Development Act 2024 (as amended by the Planning and Development (Amendment) Act 2025).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. 7

Dublin City Council (DCC) has published Proposed Variation No. 7 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 No.s 16-23 Bow Lane West, Dublin 8:

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

To: Zoning Objective Z15 ‘Community and Social Infrastructure’ -To protect and provide for community uses and social infrastructure.

Reason: No.s 16-23 Bow Lane West are zoned Z1 (Sustainable Residential Neighbourhoods) in the current Dublin City Development Plan. To better reflect and support the operational use associated with St. James’s Hospital at this location and having regard to the scale and context of the building, the range of hospital related activities carried out, the proximity of the site to St. James’s Hospital and the Z15 zoned lands on the opposite side of Bow Lane West, it is proposed to vary the zoning objective at No.s 16-23 Bow Lane West from Z1 to Z15.

3.1 Location and Description of the Subject Lands

The lands (0.12ha) are located on Bow Lane West, just north of James’s Street. The site is occupied by a substantial warehouse type structure (equivalent to approximately 3 storeys) which is largely windowless and fronts the footpath. There is pedestrian and vehicular access from Bow Lane West.

3.2 Purpose of the Proposed Variation

Under the Dublin City Development Plan 2022 –2028, the subject lands are zoned Z1 (Sustainable Residential Neighbourhoods) the objective of which is ‘To protect, provide and improve residential amenities.’ The predominant zoning along Bow Lane West is Z15 (Community and Social Infrastructure) associated with St. Patrick’s University Hospital along the northern side and Z1 (Sustainable Residential Neighbourhoods) along the southern side. The warehouse building at No.s 16-23 Bow Lane West has planning permission and is currently used for a range of warehouse related activities associated with the nearby St. James’s Hospital including as a logistics hub and data management service for patient records, storage of laboratory specimens and electronic scanning of medical records.

No.s 16-23 Bow Lane West are zoned Z1 (Sustainable Residential Neighbourhoods) in the current Dublin City Development Plan. To better reflect and support the operational use associated with St. James’s Hospital at this location and having regard to the scale and context of the building, the range of hospital related activities carried out, the proximity of the site to St. James’s Hospital and the Z15 zoned lands on the opposite side of Bow Lane West, it is proposed to vary the zoning objective at No.s 16-23 Bow Lane West from Z1 (Sustainable Residential Neighbourhoods) to Z15 (Community and Social Infrastructure).

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 RZLT Final Map for 2025 was published on 31st January 2025 and landowners had an opportunity to request the rezoning of land appearing on that map.

No. s 16-23 Bow Lane West is identified as in scope for the tax on the RZLT Final Map for 2025. The landowner has requested that the lands be rezoned from Z1 (Sustainable Residential Neighbourhoods) to Z15 (Community and Social Infrastructure) as it is used as a logistics hub and data management service for patient records, storage and electronic scanning of medical records associated with St. James's Hospital, the existing use is long established and Z15 zoning is consistent with the bona fide hospital related activity on site. In total Dublin City Council received 14 rezoning requests as part of the RZLT process in 2025. Having evaluated these requests for rezoning, it is proposed to rezone No.s 16-23 Bow Lane West, from Z1 (Sustainable Residential Neighbourhoods) to Z15 (Community and Social Infrastructure), for the reasons outlined in Section 3.2 above.

3.4 Consistency with the Dublin City Development Plan 2022-2028

The Dublin City Development Plan 2022 –2028 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. Further to this consideration, the City Council concluded that the Proposed Variation to the zoning of No.s 16-23 Bow Lane West from Z1 (Sustainable Residential Neighbourhoods) to Z15 (Community and Social Infrastructure) would not affect the residential yield of the core strategy/ population targets for the city, on the basis that No.s 16-23 Bow Lane West is not available for residential development and was not available for residential development at the time of the preparation of the development plan. The 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. The City Council further considers 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. 7 of the Dublin City Development Plan (CDP) 2022-2028, which seeks to change the land use zoning objective pertaining to lands at 16-23 Bow Lane West, Dublin 8:

From: Zoning Objective Z1 'Sustainable Residential Neighbourhoods' –

'To protect, provide and improve residential amenities.'

To: Zoning Objective Z15 'Community and Social Infrastructure' –

'To protect and provide for community uses and social infrastructure.'

It is noted that Dublin City Council considers that the proposed change from a Z1 to a Z15 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 4, 'Healthy Communities', which includes ensuring the provision of *'quality healthcare and services that support human health.'* This aligns with National Strategic Outcome 10 of the National Planning Framework. The Assembly considers that the proposed change from Z1 to Z15 supports this outcome by safeguarding a site that is integral to the functioning of one of the State's largest hospitals, thereby reinforcing the provision of healthcare infrastructure in the Dublin Metropolitan Area.

The Assembly considers that the Proposed Variation will support the sustainable and efficient reuse of a brownfield site for a people-intensive healthcare function and is therefore consistent with Regional Policy Objective (RPO) 4.3 of the RSES: *"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 and since the subject lands were neither available nor suitable for housing delivery at the time of plan adoption, it is considered that the Proposed Variation does not reduce the city's capacity for compact residential growth and 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 4 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. 7 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. 7 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

