

Proposed Variation No.8 to the Dublin City Development Plan 2022 –2028

The Eastern and Midland Regional Assembly notes the publication of Proposed Variation No. 8 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 It should be noted that this legislation has been superseded by the Planning and Development Act 2024 (as amended by the Planning and Development (Amendment) Act 2025).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. 8

Dublin City Council (DCC) has published Proposed Variation No. 8 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 designating Iveagh Gardens and Environs, Crumlin as an Architectural Conservation Area (ACA) in accordance with Sections 13 and 81 of the Planning and Development Act, 2000 (as amended).

Reason: In the context of Dublin’s suburbs, the Iveagh Gardens housing estate is a rare example of an intact early 20th century philanthropic housing initiative, its development integral to the architectural evolution of suburban Dublin. The principal objective of the Iveagh Gardens and Environs, Crumlin Architectural Conservation Area (ACA) is to seek to preserve, protect and enhance the architectural quality, character and setting of the 20th century characteristics within the ACA and to ensure that any changes complement and add to its character.

3.1 Location and Description of the Subject Lands

The subject lands comprise the Iveagh Gardens housing estate, the adjacent Iveagh Sports Grounds and associated structures in Crumlin, Dublin 12. The suburb of Crumlin lies between busy routes to the north and south that radiate from the city centre, one of which is the Crumlin Road which starts at the Camac Bridge over the Grand Canal at Dolphin’s Barn. Running south-eastwards, the Crumlin Road terminates at the junction of St. Mary’s Road which leads on to the historic village of Crumlin, an ACA. The existing Crumlin ACA is arranged around St. Agnes Road and captures the medieval Christian origins of the historic village. This proposed ACA centres on the Iveagh Gardens and the Iveagh Grounds, a housing estate and sports facility located in the northern part of the suburb.

The Iveagh Gardens is located mid-way along the Crumlin Road, to the north side directly adjacent the Iveagh Grounds. Along with Brickfields Park to the rear of these sports fields, they provide a relatively natural and quiet setting for the neighbouring early 20th century residential enclave.

Together the Iveagh Gardens and the Iveagh Grounds have a distinct and unique character defined by their philanthropic origins, their architectural designs and their setting.

3.2 Purpose of the Proposed Variation

In the Architectural Conservation Area report for Proposed Variation No. 8 prepared by Dublin City Council, the rationale for the proposed ACA designation relates to the special architectural and historic interest of Iveagh Gardens and Environs, Crumlin as follows:

- The scheme exhibits a well-designed and well-executed early suburban architecture, on an attractive scale with proportions and detailing which is typical of Garden Suburb/Cottage model architecture.
- The strong visual quality of the terraced brick buildings and the rhythmic architectural pattern provide an attractive built environment.
- The scheme has retained much of its original character and architectural integrity and provides a unique secluded atmosphere off the busy Crumlin Road.
- The quality of materials, composition and scale of the terraces create a pleasing sense of uniformity of design.

- The landscaped areas, small railed front gardens and mature trees convey a spacious leafy character to the area.
- Developed on lands purchased by the Guinness Company to provide playing fields for its workers, the Iveagh Grounds are a reminder of the philanthropy of the company and reinforce the spacious verdant nature of Iveagh Gardens and its environs.

In this historic setting the main issues and pressure for development concern identified by Dublin City Council are as follows:

- The use of front gardens to provide for car parking and the resultant loss of front boundary treatments and soft landscaping degrades the character of the streetscape and buildings.
- Small incremental changes can quickly erode the appearance of historic buildings. In particular, the removal of historic features such as chimneystacks, the use of inappropriately detailed replacement windows and double glazing, uPVC window and door frames and satellite dishes erode the architectural character and appearance of the buildings.
- Porches, extensions, roof alterations (dormers, rooflights) which have an impact on the visible elevations of buildings in the area and an adverse impact on its character.

The general objectives of the proposed Architectural Conservation Area are:

- To encourage the retention of original materials and features such as roof coverings, walls/renders, windows, doors, railings, trees and other significant features of historic buildings and landscape features within the ACA.
- To ensure that any development, modifications, alterations, or extensions affecting a structure within an ACA are sited and designed appropriately, comply with development standards and are not detrimental to the general character of the ACA.
- To encourage the reinstatement of original features.
- Dublin City Council will endeavour to ensure that works to the public domain, such as works of environmental improvement, or of utilities improvements, are of the highest standards and do not detract from, nor add clutter to, the character of the area.
- Dublin City Council will seek to ensure that any surviving historic streetscape features such as early cast concrete kerbstones in the public realm will be retained.

3.3 Background to the Proposed Variation

Objective BHAO2 of the Dublin City Development Plan 2022-2028 proposes to identify and designate further ACAs, within the identified priority areas in accordance with the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

The principal objective of the proposed Iveagh Gardens and Environs, Crumlin Architectural Conservation Area (ACA) is to seek to preserve, protect and enhance the architectural quality,

character and setting of the 20th century characteristics within the ACA and to ensure that any changes complement and add to its character.

3.4 Consistency with the Dublin City Development Plan 2022-2028

The residential area of the Iveagh Gardens housing estate is zoned Z2 in the Dublin City Development Plan 2022-2028: 'To protect and/or improve the amenities of residential conservation areas'. Iveagh Sports Ground is zoned Z9: 'To preserve, provide and improve recreational amenity, open space and ecosystem services'. Dublin City Council considers that current zoning for Iveagh Gardens and Environs, Crumlin reflects the significance and special interest of the estate.

Iveagh Gardens, Crumlin is listed as a Proposed Architectural Conservation Area under Section 11.5.2 of the Dublin City Development Plan 2022-2028 which outlines Dublin City Council's Policies and Objectives in relation to Architectural Conservation Areas.

Policy BHA7 states that it is the policy of Dublin City Council:

- To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.
- Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA.
- Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.
- Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.
- Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.
- Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs.

Policy BHA8 states that ‘There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.’

4.0 Submission

The Regional Assembly acknowledges Proposed Variation No. 8 of the Dublin City Development Plan (CDP) 2022-2028, which seeks to designate Iveagh Gardens and Environs, Crumlin as an Architectural Conservation Area (ACA) in accordance with Sections 13 and 81 of the Planning and Development Act, 2000 (as amended).

It is noted that Dublin City Council considers that the proposed designation would seek to preserve, protect and enhance the architectural quality, character and setting of the 20th century characteristics within the proposed ACA and to ensure that any changes complement and add to its character.

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 RSOs which supports the Proposed Variation are RSOs 4 and 5. RSO 4 is ‘Healthy Communities’ which aims to *“protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health”*. RSO 5 is ‘Creative Places’, which aims to *“enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration”*. These RSOs align with National Strategic Outcome 7 of the National Planning Framework – Enhanced Amenity and Heritage. The Assembly considers that the proposed designation of Iveagh Gardens and Environs, Crumlin as an Architectural Conservation Area (ACA) represents good practice in protecting the region’s architectural and cultural heritage while contributing to sustainable urban development and healthy placemaking.

The Assembly considers that the Proposed Variation will support good heritage management and promote the benefits of heritage led urban regeneration and in this respect it will align with RSOs 4 and 5 of the RSES for the Eastern and Midland Region 2019-2031.

Accordingly, the Regional Assembly does not have any objection to the Proposed Variation No. 8 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).

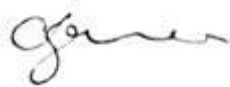
A screening for Appropriate Assessment (AA) was also carried out and concluded that the Proposed Variation will not have any likelihood for significant effects on any European sites, either alone or in

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).

6.0 Conclusion

It is considered that the Proposed Variation No. 8 to the Dublin City Development Plan 2022-2028, is consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031, having regard to the observations outlined above.

Regards,



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