

Submission to the Draft Dublin City Development Plan 2022-2028

on behalf of McCutcheon Halley Chartered Planning Consultants

February 2022



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1. Introduction

We, McCutcheon Halley Chartered Planning Consultants, have prepared this submission, in response to the Draft Dublin City Development Plan 2022-2028 (the Draft City Development Plan), which is currently on public display until the 14th of February 2022.

We welcome the ongoing review of the development plan that will guide the future growth and development of Dublin City Council's administrative area and update the current Development Plan in line with the National Planning Framework (Department of Housing, Planning and Local Government (DHPLG) 2018), the Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly (EMRA) 2019) for the Eastern and Midlands Region and relevant Section 28 Ministerial Guidelines.

1.1 Purpose of this submission

The review process of the new Development Plan presents an important opportunity for Dublin City Council (the Council) to promote the delivery of compact urban growth, with a particular focus on the Strategic Development Regeneration Areas (SDRAs) and Key Opportunity Sites, to deliver significant quantities of homes and employment within the existing built-up urban footprint over the development plan period.

This submission is not issued in relation to a specific site however it aims to ensure that the Development Plan reinforces National Policy which seeks to open up backland sites and land locked development to enable them to realise their potential.

This submission specifically relates to the unlocking of backland/landlocked development to allow for the opening up of sites that cannot achieve their zoning potential as a result of inadequate land use zoning, unsuitable access etc. The intention of adding a specific objective in this regard would not be to cater for uses which contravene the primary land use of the relevant zone but to ensure that ancillary development can be facilitated where it does not reduce or erode the primary land use or the potential to deliver permissible uses in accordance with the relevant land use zoning.

Commentary and suggested additional text are provided as follows.

MHP are suggesting the following objective is introduced to Section 15.13.4 'Backland Housing':

In certain instances, Dublin City Council may permit relaxation of some standards and it may be appropriate not to stringently apply city-wide zoning restrictions to promote densification and urban consolidation in specific areas.

The reason is to support the policies/objectives in the draft plan relating to backland development, brownfield development and active land management as per Section 15.5.1, QHSN5, QHSN8 and QHSN04.

Section 15.5.1 discusses *Brownfield, Regeneration Sites and Large Scale Development* which have the ability to regenerate and rejuvenate large portions of the city through redevelopment and to provide connections into the surrounding street pattern and existing open space network. The opening up of such lands is important to ensure that development is promoted and to support residential consolidation and sustainable intensification in the right locations.

This policy will seek to reinforce policies **QHSN5 - Regeneration, Compact Growth and Densification Urban Consolidation** - *To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation and* **QHSN8: Active Land Management** - *To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites, and underutilized sites and* **QHSN04 Densification of Suburbs** *To support the ongoing densification of the suburbs and prepare a design guide regarding innovative housing models, designs and solutions for infill development, backland development, mews development, re-use of existing housing stock and best practice for attic conversions.*

The new Dublin City Development Plan 2022-2028 provides an opportunity to ensure that backland and land locked sites can be suitably developed as anticipated by national policy and to ensure that ancillary development can be facilitated where it does not reduce or erode the primary land use or the potential to deliver permissible uses in accordance with the relevant land use zoning.