



26<sup>th</sup> June 2026

Administrative Officer,  
Planning Section,  
Dún Laoghaire-Rathdown County Council,  
Marine Road,  
Dún Laoghaire,  
A96 K6C9.

**Re: Proposed Material Alterations to Proposed Variation No. 1 to the Dún  
Laoghaire-Rathdown County Development Plan 2022-2028**

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to Proposed Variation No. 1 (proposed Variation) to the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (Development Plan).

As Dún Laoghaire-Rathdown (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office of the Planning Regulator (Office) has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act). This submission sets out the outcome of that assessment<sup>1</sup>.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to

---

<sup>1</sup> Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of development plans and variations by planning authorities and the assessment by the Office, was commenced on 31<sup>st</sup> December 2025. However, section 69(2) provides that the variation of a development plan under section 13 of the Act of 2000 shall continue under that Act after the repeal of section 13 of the Act of 2000.

ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

## **1. Response to the Office's submission on the proposed Variation**

The Office welcomes and commends the significant work undertaken by the Planning Authority to date and the material alterations in particular, in addressing the recommendations of the Office as expressed in its submission at draft stage. In respect of the Office's three recommendations at draft stage, the Office welcomes the following:

- the re-examination of a number of infill sites to determine if all suitable opportunities for additional residential development are zoned accordingly (Recommendation 1);
- the removal of any reference to 'parking zones' in the density range standards (MA 4) (Recommendation 2); and
- the addition of a specific local objective in relation to Old Connaught (MA 43) and rezoning of lands at Woodbrook-Shanganagh within Flood Zone A and B to provide for water compatible uses only (MA 43) (Recommendation 3).

## **2. Overview of submission on proposed material alterations**

These proposed material alterations positively respond to the key purpose of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) by facilitating housing delivery on infill sites in serviced and accessible locations and by removing constraints to development at appropriate densities.

This approach supports the zoning of sufficient lands to meet the housing growth requirements set out in the Housing Growth Guidelines. It is therefore important that the provision of social and community infrastructure for existing and future communities is delivered in a balanced manner that supports, and does not impede, the timely development of serviced lands in accessible locations capable of contributing to housing supply in the short term.

In this context, and with specific reference to the proposed material alterations relating to the Specific Local Objectives (SLO) for the Racecourse South lands, the Office considers that the requirements unduly constrain the delivery of housing on serviced lands that are otherwise capable of development in the short term. The Office therefore recommends that the Planning Authority reviews these SLOs and implements the recommended changes set out in Recommendation 1 below.

In relation to flood risk management, the Office also recommends modifications to new specific local objectives for lands at Via Verde, Highfield House and The Park Carrickmines to ensure the proposed material alterations are materially consistent with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The following recommendations set out below are intended to support the Planning Authority in finalising the proposed Variation and ensuring its effective implementation.

Subject	Recommendation	Observation
<a href="#">Housing delivery</a>	<a href="#">MA Recommendation 1</a>	-
<a href="#">Flood risk management</a>	<a href="#">MA Recommendation 2</a>	-

### 3. Housing delivery

The key message of the Housing Growth Guidelines is that zoning should prioritise lands that are serviced, viable, and capable of delivering housing within the lifetime of the Development Plan. Conversely, if zoned land cannot realistically be delivered soon, planning authorities should replace or supplement it with land that can.

Within this policy context, the Office has concerns regarding the new SLO 183 (MA 29) and SLO 184 (MA 30), which have the potential to constrain housing delivery on the serviced lands at Racecourse South that are critical to meeting the short-term housing demand.

SLO 183 (MA 29) requires the provision of a school site prior to permission being granted for residential units and restricts occupation of 50% of units prior to the

opening of the school. Given that the Racecourse South lands are already identified for educational use within the Development Plan, and that engagement with the Department of Education and Youth is ongoing, this requirement is considered unnecessarily restrictive and likely to impede timely delivery. The Office therefore recommends that SLO 183 is omitted.

SLO 184 (MA 30) requires the preparation of a masterplan to be prepared for the Racecourse South lands in accordance with the policies of the Ballyogan and Environs Local Area Plan (Local Area Plan). While the preparation of a masterplan is supported, the Office considers that requiring adherence to the Local Area Plan, prepared in 2019 and extended to May 2027, may introduce uncertainty and complexity to the consideration of a planning application during the lifetime of the Development Plan. A modification is therefore recommended to omit specific reference to the Local Area Plan or to otherwise ensure that this objective does not unduly or unintentionally delay the development of the lands.

### **MA Recommendation 1 - Housing delivery**

Having regard to housing delivery, and having considered:

- NPO 42 of the NPF (target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042);
- NPO 43 of the NPF (prioritise the provision of new homes at locations that can support sustainable development); and
- the NPF Implementation: Housing Growth Requirements (2025),

the Office recommends that the Planning Authority:

- (i) omits MA 29 - SLO 183;
- (ii) makes a modification to omit reference to Ballyogan and Environs Local Area Plan from MA 30 - SLO 184; and
- (iii) makes a modification to omit the text 'No new residential communities will be delivered on LTSS lands until a school is delivered on the ED site on the Glenamuck Road.' from MA 31 - SLO 185.

#### 4. Flood risk management

The Office welcomes the amendments to the proposed Variation to address Recommendation 3 of the Office's submission at draft stage and the preparation of the Addendum to appendix 15 Strategic Flood Risk Assessment (SFRA) in relation to the proposed material alterations.

MA 20 and MA 23 set out specific local objectives for lands at Via Verde (SLO 174, map 6) and lands at Highfield House (SLO 178, map 6) respectively, to ensure that highly vulnerable uses are situated at first floor and above within Flood Zones A and B and the Climate Change High-End Future Scenario, as appropriate. The Office considers that a modification to SLO 174 and SLO 178 is required to clarify the uses that are acceptable on ground floor level, to ensure material consistency with the Flood Guidelines.

The Addendum to appendix 15 SFRA identifies lands at The Park Carrickmines to be rezoned from employment to residential uses (Proposed Material Alteration Map Item 5 - map 9) as including lands within Flood Zone A and B. Furthermore, the Addendum states that redevelopment of the site for less or highly vulnerable development has not passed the Plan Making Justification Test and only water compatible uses will be permitted within Flood Zone A and B.

MA 32 introduces a new SLO 186 for The Park Carrickmines which does not address flood risk. As such, the Office considers that a modification to SLO 186 is required to reflect the findings of the Addendum to ensure only water compatible uses are provided for within Flood Zones A and B at The Park Carrickmines.

#### MA Recommendation 2 - Flood risk management

Having regard to flood risk management, and having considered:

- NPO 78 of the NPF (avoiding inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test);
- RPO 7.12 of the RSES (seek to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with the

requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines)); and

- the Flood Guidelines,

the Office recommends that the Planning Authority makes a modification to:

- (i) MA 20 - SLO 174 (lands at Via Verde) to clarify uses that are acceptable at ground floor level;
- (ii) MA 23 - SLO 178 (lands at Highfield House) to clarify uses that are acceptable at ground floor level; and
- (iii) MA 32 - SLO 186 to reflect the findings of Addendum to appendix 15 Strategic Flood Risk Assessment that only water compatible uses are permitted within Flood Zones A and B at The Park Carrickmines.

## 5. Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office **within five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

---

AM O'Connor

**Anne Marie O'Connor**

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015

\_\_\_\_\_