



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

22nd February 2021

Development Plan Team,
Planning and Property Development Department,
Wood Quay,
Dublin 8

Re: Issues Paper for the Dublin City Development Plan 2022 – 2028

A chara,

Thank you for your authority's work in preparing the Issues Paper for the review of the Dublin City Development Plan (the plan). The Office acknowledges and welcomes the publication of this paper and your authority's work, more broadly, in advancing the review of the plan.

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework* (NPF) and the *Regional Spatial and Economic Strategy for the Southern Regional Assembly* (the RSES);
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some broad areas for your authority to consider in formulating the draft development plan.

These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative

requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

Overall approach to Issues Papers

The Office appreciates the challenge in presenting a succinct document, with which to engage the public that also addresses the full national and regional policy context at the city scale.

The range of topics addressed are comprehensive and appropriate and the digital document is well set out, engaging and accessible. The planning authority is commended for providing a concise digest of the issues paper (18 pages), and in particular for ensuring that the summary was approved by the National Adult Literacy Agency (NALA). This approach will have facilitated engagement in the process with the broad spectrum of society.

The Office acknowledges the difficulties for planning authorities in carrying out effective public consultation on its plan review during the current Covid-19 restrictions. Within this context, the Office welcomes the planning authority's use of digital engagement, formats and media to ensure the widest level of engagement.

In particular the Office notes the planning authority's use of its website to explain the plan review process and the purpose of the consultation process with short explainer videos, and for its use of virtual public information meetings/webinars covering key areas of interest in the plan review. Holding webinars both during and *outside* office hours could potentially have captured a wider cohort of participation at live online event. It is noted that the recordings of the webinars are available online and this is welcomed but should not replace potential for engagement for attendees unavailable during office hours.

The planning authority's engagement with the local and national media to promote the plan review process, in addition to its proactive use of social media, thereby maximising exposure and potential engagement, is noted by the Office. The engagement with primary school children through the poster competition is also a very positive aspect of the public consultation process and has the potential to raise awareness of the development plan and its relevance to children and young people.

Core Strategy, Settlement Hierarchy and Implementation

Core Strategy - The Issues Papers clearly set out the broad policy context that will play a determining role in the scale and pattern of future growth for Dublin city, including the hierarchy of statutory plans comprising *National Planning Framework* (NPF), the *Eastern and Midland Regional Assembly* (EMRA) *Regional Spatial Economic Strategy* (RSES), the *Dublin Metropolitan Area Strategic Plan* (MASP); and other critical policy documents including, inter alia, the Government's *Climate Action Plan 2019*, the Government's *Rebuilding Ireland: An Action Plan for Housing and Homelessness* and the *NTA Transport Strategy for the Greater Dublin Area*.

Whilst the targets for housing provision in the plan will be determined in accordance with the section 28 *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities* (DHLGH, 2020), the formulation of the core strategy consistent, in accordance with the provisions of section 10 of the Act, will be the most significant element in developing your authority's development plan.

A key function of a core strategy is to focus on a planning authority's preferred approach to both the spatial pattern and quantity of housing delivery over the lifetime of the plan. The planning authority will note, however, that the population growth parameters of the NPF, the NPF *Implementation Roadmap* and the RSES continue to apply in tandem with the aforementioned guidelines, in accordance with the legislative provisions for the core strategy. The Issues Paper acknowledges the need to accommodate an extra 235,000 to 293,000 people within the City and suburbs by 2040, which will pose a significant challenge for the city and the three neighbouring authorities¹.

The detailed baseline information on population trends, housing delivery and on dependency rates for the city, as provided in the Issues Paper forms a solid evidence base upon which the future core strategy can be developed in order to meet this challenge.

Settlement Strategy – The planning authority's suggested approach to the new core strategy, which would focus on the city centre, the strategic development and regeneration areas, key district centres, three large SDZs (Grangegorman, North Lotts and Grand Canal Docks and Poolbeg West) is consistent with the approach of the Dublin MASP. It will be essential for the core strategy to align with the strategic development areas and corridors as set out under *Table 5.1 of the MASP*, as contained in the RSES.

¹ Albeit this extends beyond the legal boundary of the city.

The Office fully supports the stated objective of the next plan to ensure the continued consolidation of the City and that the new opportunities presented by continued investment in public transport including key projects such as Bus Connects, Luas extension and Metro are fully maximised.

Implementation - A primary issue for the next plan will be the focus on practical implementation of the core strategy during the plan period. In this regard, the delivery of enabling infrastructure and key future growth enablers identified in the NPF, the RSES and MASP will be crucial.

In particular, the MASP identifies capacity issues in relation to both water supply and wastewater infrastructure, in addition to transport investment priorities, as the key areas of concern. The resolving of capacity constraints in these areas will be critical to facilitating the growth of the city. However, the capacity of energy and social infrastructures are also areas that will need to be addressed.

In addition specific infrastructural priorities are also identified in the MASP for the individual strategic sites under Table 5.1 Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing.

In this regard, the Office would highlight the requirement for a tiered approach to zoning in accordance with NPO72a-72c. The scope of any infrastructure assessment study will need to be sufficiently broad to take account of the full range of enabling infrastructures referred to in the RSES and will need to provide clarity in terms of the timeframe for delivery, cost of delivery, identification and availability of funding and the body responsible for implementation in order to provide the certainty required to ensure delivery of the core strategy over the plan period.

This information will therefore enable your planning authority to prioritise relevant land banks with appropriate land activation measures within its control in the near, medium and longer term in order to achieve the growth objectives for the city over the 6-year plan period, and to 2031 and 2040. In view of the location of the strategic development corridors traversing the city boundary, consultation and close collaboration with the neighbouring authorities, in addition to relevant infrastructural providers, will likely be critical to the implementation of the strategic development areas. This will be particularly so for the North Fringe and Naas Road areas. In this regard, the Office would highlight the importance of subsections 9(4) and (5) of the Act.

Your planning authority should take realistic account of the level of certainty that the required infrastructure and facilitating works will be completed in time to facilitate the development of strategic areas to accommodate the population growth and housing supply envisaged under the RSES and the aforementioned Section 28 Housing Supply Guidelines within the plan period.

Accordingly, use of scenario planning may be appropriate in devising your development plan, whereby your development plan would identify a sequence of development opportunities with in-built resilience to move to another tier of development opportunities if any key opportunity areas were subject to unforeseen delays in the delivery of enabling infrastructure. At the same time, such alternative sites will need to be consistent with objectives of the NPF and the RSES.

Significant capacity issues that exist for water infrastructure for the city, including the Clonsaugh WWTP and the water supply scheme for the city and mid-east region, which are largely outside the control of the planning authority. It is therefore essential that your planning authority continues to liaise with Irish Water, where possible, to mitigate capacity constraints through interim measures. This should include maximising the implementation of Sustainable Urban Drainage Systems (SuDS), in accordance with the Guiding Principles and objectives for surface water (RPO 10.15-10.18) of the RSES, to ensure that the combined drainage infrastructure within the city can accommodate foul effluent from the regeneration and densification of urban areas.

Your development plan should also make clear what infrastructure and key enablers will be put in place, and by what mechanisms, over the period of the plan to facilitate development of other strategic areas over the medium and longer term consistent with the RSES and Dublin MASP.

The Office is available to liaise with your planning authority and the Department in its formulation of the core strategy over the coming months.

Regeneration and Compact Growth

The Office welcomes the recognition of the role that urban regeneration and compact growth will play in the future development of the city, including through the strategic development and regeneration areas of the MASP. However, it is also important that your authority has identified the wider opportunities that exist for regeneration across the city, including the

potential to revitalise urban villages and city neighbourhoods to act as focal points of the existing and new communities.

The planning authority is to be commended for recently carrying out a strategic review of all low intensity industrial areas of the City, culminating in the rezoning of a number of sites for more intensive residential and mixed use development. The implementation of a similar approach to underutilised lands in other parts of the city, including, as suggested by the planning authority, in the Liberties, the North East Inner City and the Naas Road area, would be consistent with the Guiding Principles for the Dublin MASP to relocate less intensive employment uses outside the M50 ring and existing built up area.

The focus on urban regeneration supports the objectives of the NPF for compact growth (NPO 3b) to deliver at least half of all new homes targeted in Dublin city and its suburbs within its existing built up footprint. This will enable the planning authority to more demonstrably comply with the requirement of RPO 3.2 that the core strategy set out measures to achieve this target for compact growth and RPO 3.3 that the core strategy identifies regeneration areas and the specific objectives to deliver urban infill and brownfield development in line with the Guiding Principles set out in the RSES. Whilst the Issues Paper considers the issue of vacant sites, the Guiding Principles also require the development plan to set out measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres.

The Office welcomes the opening of public discussion through the Issues Paper of building height and densities, having regard to the requirement of section 28 guidelines included in the *Urban Development and Building Heights* (2018). The implementation of the Specific Planning Policy Requirements (SPPRs) specified in those guidelines and in the *Sustainable Urban Housing: Design Standards for New Apartments* (2018) through the development plan will play an important role in achieving compact growth. However, the planning authority will also be mindful to apply the requirement of other relevant section 28 guidelines, including the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)* (2012) in the making of its development plan.

The implementation of 'Healthy Placemaking', one of the three key principles underpinning the RSES, is identified as a key enabler for the MASP both for residential and economic development, and it is also identified as a growth enabler for the Dublin city as part of the overall approach to compact growth. Therefore the Issues Paper recognition of the need to achieve a balance between achieving compact growth and ensuring the development of high

quality places where people want to live, and the proposal that the plan will seek to promote 'Healthy Placemaking' and to protect existing green and blue infrastructure from urban development pressure, is consistent with the MASP.

Economic Development & Employment

A vital aspect of the plan will be the promotion and nurturing of the city's economic and employment base in order to sustain the city and the wider region. In accordance with the NPF requirements (NPO10b), the RSES has identified strategic employment development areas within the Dublin MASPs under table 5.2. These have been referred to in the Issues Papers, in addition to the general aim to intensify existing employment lands within the M50 ring.

The inclusion of objectives, policies and mechanisms to assist and secure the development of the strategic economic development locations (subject to any appropriate and necessary safeguards), consistent with the economic principles under the RSES, can therefore be anticipated to form a key element of the development plan.

The Issues Paper note the RSES's economic strategy for the region which underpinned by five economic principles – Smart Specialisation; Clustering; Orderly Growth; Placemaking for enterprise; Future Proof and Risk Management – and draws out many of the key considerations for economic development facilitated by the future plan. The RSES also sets out guiding principles to assist local authorities in identifying locations for strategic economic development in the development plan and for investment priorities for placemaking for enterprise development, which will inform the approach of the planning authority.

Dublin city and the Metropolitan Area is the leading national economic driver in the State. There is potential to continue to build on this role into the future, however, as recognised in the Issues Paper the city has vulnerabilities in terms of maintaining this competitiveness, including a shortage of quality affordable housing, areas of high levels of deprivation, and uncertainties resulting from e-commerce (online retailing), climate change, Brexit and the Covid-19 crisis. Your authority has made and continues to make progress in many of these areas to date, including improving the city's pedestrian and cycle infrastructure in response to the Covid-19 crisis. However, it will be a difficult challenge to respond effectively to the dramatic impact of Covid-19, and indeed of Brexit, on the pattern of employment in the city until the longer term implications become clear.

The city forms one pole of the Dublin-Belfast Corridor, the strategic function of which is promoted under the RSES and by the NPF (NPO 44). The future development plan should therefore consider how the city can contribute to the promotion of the corridor and how the city might benefit from the economic opportunities that could arise through the successful development of the corridor.

The challenges facing retailing in the city are noted in the Issues Paper. The Office recognises that your plan preparation process will be hindered, somewhat, by the absence of an up to date joint retail strategy with the surrounding counties, as required under section 3.5 of the Retail Planning Guidelines and supported by the RSES (RPO 6.10). In the absence of a revised strategy the retail hierarchy set out under Table 6.1 of the RSES will apply.

Transport & Accessibility

The Office welcomes the highlighting of the significant environmental impact of including through greenhouse gas (GHG) emissions (20% of national emission), the energy use (highest energy use by sector) and noise and air pollutions (the highest contributor in Dublin), and the importance of transitioning to low carbon mobility solutions to mitigate negative impacts through the development plan.

The progress that has been made by your planning authority to integrate land use and transportation over recent decades is appreciated. The transport strategy of the RSES, the details of the MASP and the transport strategy for the GDA will inform the sustainable settlement and transport strategies for your plan area, in line with section 10(2)(n) of the Act.

It will be essential for your authority to achieve a significant modal shift in your functional area, in conjunction with the surrounding counties within the GDA, away from the private car and towards active and sustainable modes, in order to meet the modal shift targets under Smarter Travel and the requirements under section 10(2)(n) of the Act. This will achieve corresponding improvements in air quality and in the noise environments to benefit those living, working and/or visiting the city.

In order to achieve this change, the further integration of spatial and transport planning, in accordance with the *Guiding Principles for the Integration of Land Use and Transport* and related RPOs (8.1-8.4, refer) under RSES, will be critical to avoiding the need to travel. This can be achieved through, inter alia, sequential, compact development (e.g. the '10 minute'

settlement concept as referenced in the Guideline Principles), the locating of trip intensive development on locations served by high capacity public transport, the provision for/facilitation of active and sustainable transport modes (RPO 5.2 and RPO 5.3) and ensuring new development areas are permeable for walking and cycling, in addition to transport demand management (RPO 8.2, refers) such as maximum car parking standards in accordance with the Avoid-Shift-Improve (A-S-I) framework², which is consistent with the objectives of the NPF and the RSES.

The planning authority should identify in the Plan, in consultation with the NTA and TII, any proposed development areas within the City for which it would be necessary to prepare Local Transport Plans, and to set out clear timelines and the relationship with future Local Area Plans.

In view of the requirements under section 10(2)(n) of the Act, the Office suggests that the draft Plan include broad targets for modal shift to be achieved over the plan period, against up to date baseline data on modal split. Such targets should be aligned to the promotion of relevant measures to achieve a reduction in GHG emissions and energy use as required under the aforementioned subsection of the Act.

This approach would be consistent with the requirement, under RPO 3.6 of the RSES concerning the requirement to assess the impact of the development plan on carbon reduction targets. It is also provided for under the Guiding Principles.

In this regard, the implementation of the provisions for walking and cycling under the RSES may be seen as crucial to achieving modal shift and the '10 minute settlement' concept. Commitment to the proactive implementation of good urban design principles, including, inter alia, through the *Design Manual for Urban Roads and Streets* (revised 2019) in the required locations, consistent with section 9.4 Healthy Placemaking (RPOs 9.10-9.13), will facilitate priority for active and sustainable modes, in addition to improvement of the street environment and overall quality of life of urban areas and settlements of all sizes.

As your planning authority will be aware, section 9(6) of the Act also requires your planning authority to ensure its development plan is consistent with the NTA Transport Strategy for the GDA. In this regard it will be critical that your planning authority makes appropriate provision to support the delivery and integration of key transport enablers to accommodate city growth over the plan period and beyond, consistent with the NPF and the RSES,

² As referenced in 'Ireland's Environment - An Integrated Assessment 2020' (EPA, November 2020)

including BusConnects, DART expansion and LUAS extension programmes and Metro Link while maintaining the capacity and safety of strategic transport networks.

It will also be important to ensure, through the objectives, policies and standards contained in the development plan, that the carrying capacity, operational efficiency, safety and significant national investment being made in national roads and light rail network are protected in accordance with, inter alia, Smarter Travel (DTTaS, 2009) and the Spatial Planning and National Road Guidelines (DoECLG 2012). This should include the protection of existing infrastructure (e.g. M50 and Dublin Tunnel) and routes for future projects (the Dublin Eastern Bypass Corridor and the M50 South Port Access).

Climate Action and Renewable Energy

Climate action – The Issues Paper set out clearly the policy context governing climate action under the NPF, the RSES and the *Climate Action Plan 2019 (CAP)* and the relationship to compact growth and other requirements. The planning authority has made good progress in developing a strategy to address climate change through the adoption of the *City Climate Change Action Plan 2019-2024*, and through its proactive working relationship with CODEMA to accelerate the transition to a low carbon city in order to mitigate the effects of the city on climate change.

The Office also welcomes the inclusion of clear definitions for climate mitigation and climate adaptation in the Issues Paper. It is advised that similar definitions are included in the development plan and that particular care is taken in how the terms mitigation and adaptation are applied across the Plan, so as to avoid confusing the two related approaches.

The Government's Climate Action Plan 2019 sets out the medium term strategy for the State's response to climate change and, in the longer term, indicates its support for the adoption of a net zero target for carbon emissions by 2050 at EU level. The overall reduction of carbon emissions and energy use will necessarily be a cross-cutting planning policy issue to be addressed in the development plan.

Your authority will be aware that the Office is required under section 31AM(2)(a) of the Act to address, in particular, the legislative and policy matters within the scope of section 10(2)(n) in its evaluations and assessments of your authority's development plan. This subsection concerns the inclusion of objectives for the promotion of sustainable settlement and transport strategies for both urban and rural areas, which include the promotion of measures

to reduce energy demand, to reduce GHG emissions and to adapt to climate change through, in particular, the location, layout and design of new development.

In this regard, the implementation of the *City Climate Change Action Plan 2019-2024* by your authority can be expected to contribute to your authority meeting the requirements under the Act. However, it is important that climate adaption and mitigation measures are mainstreamed into the development plan, through objectives, polices and through appropriate development management standards.

Regarding climate change adaptation, the Office notes the recognition of flood risk as a critical issue within your authority's functional area. The Issues Papers clearly indicate your authority's intention to address the relevant environmental assessments and obligations during the plan making process, including the critical issue of Strategic Flood Risk Assessment (SFRA).

The Office would advise your authority to consult with the Office of Public Works (OPW) at the earliest opportunity to ensure your approach to SFRA is consistent with the approach required under *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG & OPW, November 2009) as clarified by Circular PL 2/2014. The circular clarified important issues concerning the undertaking of the justification test for, inter alia, the existing, zoned built up area where only minor development would be anticipated. It will also be important that the SFRA takes due account of the potential impact of climate change on flooding in order to ensure potential flood risk to the city is fully and appropriately addressed through the plan making process.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, the matters discussed in the preceding section on Transport & Accessibility will be critical. This will include the integration of land use and transport, the facilitation of active and sustainable modes and the implementation of transport demand management measures consistent with the requirement for sustainable settlement and transport strategies.

Your authority is required to ensure that the development plan provides sufficient clarity and certainty in terms of the measures proposed under section 10(2)(n) to direct the preparation of future local area plans made consequent to the development plan. In this regard, the Office would strongly advise that all land use zoning objectives for your functional area should be included as part of the development plan rather than delayed to the preparation of local area plans.

The Office understands that forthcoming updates by the Department to the section 28 *Development Plan Guidelines* will initiate a process of enhanced guidance for the preparation of development plans. This will include guidance on the requirements under section 10(2)(n) of the Act.

Renewable Energy - Your authority will note that both the NPF (NPO55) and the RSES (inter alia, RPO 7.35) promote and support renewable energy generation, which will contribute to achieving a net zero carbon economy by 2050.

While the scope for wind energy deployment in the area of the City Council may be limited, your authority's attention is nonetheless drawn to relevant parts of the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017)*, subject of Circular Letter PL 5/2017. The Guidelines require that development plans indicate how their implementation will contribute to realising overall national targets on renewable energy and climate change mitigation and are worth considering in the context of the next development plan for Dublin City.

In this regard, the Office welcomes the highlighting in the Issues Paper of the need to consider new policy support for innovative waste treatment and reuse infrastructure and the use of waste treatment process to generate energy (waste-to-energy facilities such as district heating), with an overall focus on a circular economy approach to waste management. It will be critical for the development plan to provide clarity on how it is proposed to ensure that infrastructure, such as district heating using waste heat, will be implemented by public and private development.

Culture and Heritage

The Issues Paper recognises the importance of protecting the built and cultural heritage to the city of Dublin, consistent with the provisions of the NPF and the RSES. The Council has a strong record in the area of built heritage protection in carrying out its forward planning and development management functions, however the need to accommodate growth and intensification of the city will likely increase the pressures on built heritage and the existing management systems in place to protect same.

The protection of culture and heritage amenities, both in their own right, as amenities for the public and as important economic drivers for the city is an important function of the development plan. The need to strike a balance between conservation and development, as

recognised in the Issues Paper, will present a significant challenge to be addressed by the development plan.

Summary

In conclusion, the Office commends your authority on the range of key issues considered in its Issues Papers and its approach to engagement with the public, including through webinars and public surveys.

The next Dublin City development plan presents both new opportunities and challenges for the city and the wider Dublin Metropolitan Area in line with Government policy under the National Planning Framework and the Regional Spatial and Economic Strategy, as the national economic driver for the state.

In summary, the Office would advise that your authority to pay particular attention to the following issues in the formulating of the development plan.

- A key challenge for the forthcoming development plan will be delivering the level of residential development necessary to meet the population and housing targets set out in the NPF, RSES and the Section 28 Guidelines. This will involve intensive and targeted action to activate vacant and underutilised land and will require specific policies and implementation measures to deliver infill / brownfield development in the city's designated strategic development areas and corridors. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).
- It is acknowledged that delivery of this level of growth will in certain cases be dependent on infrastructure delivery, particularly water supply and waste water. The infrastructure assessment study prepared in conjunction with the draft plan should consider the realistic projected timeframe and cost of delivery of key enabling infrastructures for the strategic residential and regeneration areas, and strategic employment locations identified under the Dublin MASP, in addition to the availability of funding, and the body responsible for implementation of the said infrastructure for strategic locations such as the Naas Road/Ballymount SDA.
- A coordinated and joint approach with neighbouring authorities will be required, particularly in respect of the redevelopment of the Naas Road corridor (South Dublin City Council) and the northern fringe (Fingal County Council) to ensure that the highest quality of development and regeneration is achieved.

- The implementation of integrated land use transport planning, in coordination with the neighbouring planning authorities will also be very important, including provision of clear policy support for the implementation of the Transport Strategy for the GDA, and relevant local planning objectives, policies and development management standards.
- Appropriate provision should be made to support the delivery and integration of key transport enablers to accommodate city growth over the plan period and beyond. This should include BusConnects, DART and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of the existing strategic transport network (e.g. M50 and Dublin Tunnel) and routes for future projects (the Dublin Eastern Bypass Corridor and the M50 South Port).
- It is critical that the plan includes practical and measurable objectives for promoting sustainable settlement and transport strategies, reductions in greenhouse gas emissions, reduced energy usage and adaptation to the effects of climate change. In this regard the Office advises that climate mitigation and adaptation measures are integrated into the development plan and that the plan provides sufficient clarity in terms of objectives and measures proposed under section 10(2)(n) to inform future LAPs within your functional area. The inclusion of all land use zoning objectives within the development plan, as has been the practice for your authority, would be welcomed.
- Consultation with the OPW should be carried out in relation to the preparation of the Strategic Flood Risk Assessment, with particular reference to the application of the Justification Test to existing urban areas where highly vulnerable and vulnerable uses would be accommodated in Flood Zone A and highly vulnerable uses would be accommodated in Flood Zone B. Provision should also be made to take account of the potential impact of climate change on flood extent, having regard to CFRAMs and 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).
- In view of the proposed densification of the city area for residential development and its intensification for economic uses, it will be important that the plan provides for a commensurate improvement in the overall quality of the public realm, in line with the Guiding Principles for Healthy Placemaking under RSES. This should encompass the broad range of quality of life issues, including the quality of residential units, quality of the street and urban context, protection and improvement of the natural environment – green and blue infrastructure – and of the built and cultural heritage of the city.

The Office looks forward to reviewing the future draft development plan and is committed to continued positive engagement with your authority in implementation of national and regional policies at county and local level.

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 the undersigned or at plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end.

Anne Marie O'Connor
Deputy Regulator and Director of Plans Evaluations
