

3rd October 2025

Planning and Property and Economic Development Department,
Block 4, Floor 3,
Dublin City Council,
Civic Office,
Wood Quay,
Dublin 8.

**Re: Proposed Variation No. 8 to the Dublin City Development Plan 2022-2028 –
Iveagh Gardens and Environs, Crumlin**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 8 (proposed Variation) to the Dublin City Development Plan 2022–2028 (City Development Plan).

As Dublin City Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The 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) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the proposed Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The proposed Variation seeks to vary the City Development Plan by designating the Iveagh Gardens and Environs, Crumlin as an Architectural Conservation Area (ACA). It is noted that the proposed Variation lands (the proposed ACA) include the existing Iveagh Gardens housing estate and the adjoining recreational facilities at Iveagh Sports Grounds.

Having reviewed the proposed Variation against the relevant criteria set out below, the Office is satisfied that the proposed Variation does not raise any concerns in relation to consistency with the legislative and policy requirements.

The Office notes that the proposed Variation has been prepared in accordance with the Architectural Heritage Protection, Guidelines for Planning Authorities (2011) (Architectural Heritage Guidelines). In particular, the proposed Variation complies with the content of chapter 3 of the Architectural Heritage Guidelines, including section 3.6.2 relating to the formation of ACA policies by means of a variation to a development plan. The Office concludes that the proposed Variation does not raise any issues in respect of compliance with the Architectural Heritage Guidelines.

In addition, the Office welcomes that the proposed Variation has been screened as part of the processes for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). In this regard, the Office notes the determination that a full SEA is not required to be undertaken, that the proposed Variation does not require an AA or the preparation of a Natura Impact Report.

Therefore, the Office concludes that the proposed Variation does not raise any issues in respect of compliance with section 28 guidelines.

Notwithstanding the above, the Office is concerned about the lack of information relating to the integration of the proposed Variation into the City Development Plan, this forms the basis of the observation below.

Furthermore, having regard to Policy GI49 of the City Development Plan relating to the protection of existing and established sport and recreational facilities, the Planning Authority should ensure that the ACA designation supports the ongoing recreational uses and/or future uses of the Iveagh Sports Grounds, while protecting its heritage status.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) observation under the following key theme:

Key theme	Recommendation	Observation
Integration of the proposed Variation into the City Development Plan	-	Observation 1

Compliance with the City Development Plan

The designation of a new ACA by way of the proposed Variation complies with the strategic approach to the protection and enhancement of the city's built heritage, set out in section 11.4 of the City Development Plan, and complies with Objective BHAO2 of the City Development Plan relating to the identification and designation of further ACA within the identified priority areas.

Having regard to the above, the Office notes that the Iveagh Gardens, Crumlin is identified as one of the priority ACA's listed in section 11.5.2 of the City Development Plan. The ACA report which accompanies the proposed Variation indicates that the listing currently in section 11.5.2 of the City Development Plan solely relates to the housing estate at Iveagh Gardens. The report highlights that following investigation this was revised to include the Iveagh Sports Grounds. The approach to the overall conservation, protection and enhancement of the existing Iveagh Gardens housing estate, Crumlin and the adjoining Iveagh Sports Grounds as an ACA is noted.

Integration of the proposed Variation into the City Development Plan

The Office acknowledges the inclusion of the informative ACA Report as part of the proposed Variation, however based on the material provided with the proposed Variation, it

is not clear if the ACA Report is to be included within the City Development Plan and where it is to be inserted.

Nor is it clear how it is intended to integrate the proposed Variation into the text and mapping of the City Development Plan. This should be clarified by the Planning Authority in the interest of transparency.

In addition, the proposed Variation does not set out the specific chapters, sections, maps and appendices of the City Development Plan which will have to be updated as a result of the designation of Iveagh Gardens and Environs, Crumlin as an ACA. In the interest of clarity, the Planning Authority should set out how it is intended to integrate the proposed Variation to designate the new ACA into the text and maps of the City Development Plan.

Observation 1 - the integration of the proposed Architectural Conservation Area at Iveagh Gardens & Environs, Crumlin into the Dublin City Development Plan 2022-2028

Having regard to the need to integrate the proposed Architectural Conservation Area (ACA) designation into the Dublin City Development Plan 2022–2028 (City Development Plan), the Planning Authority is advised to identify:

- (i) where the ACA Report for the Iveagh Gardens and Environs, Crumlin is to be inserted within the City Development Plan; and
- (ii) how it is intended to integrate the proposed ACA designation for the Iveagh Gardens and Environs, Crumlin into the City Development Plan and include all resultant changes including any text deletions, new text requirements within particular chapters, sections, appendices and mapping.

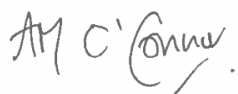
Summary

The Office requests that your authority addresses the observation outlined above.

Your authority is also required to notify the Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation.

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.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015