

18th November 2025

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

Re: Proposed Variation No. 9 to the Dublin City Development Plan 2022-2028
(Broombridge-Hamilton Masterplan)

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 9 (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 any recommendations 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 can also 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 Variation, the Office will consider whether the Variation has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and sustainable development of the area concerned.

Overview

The proposed Variation includes a number of changes to the City Development Plan, specifically in relation to lands at Glasnevin (referred to as the Broombridge-Hamilton Masterplan) with regard to the following elements:

- core strategy and settlement hierarchy;
- zoning amendments; and
- policy amendments.

The Office notes the submission of the Chief Executive's Report in relation to the recently published NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements) which outlines to the elected members how it is proposed to secure the objectives of the section 28 Guidelines and the National Planning Framework First Revision (2025) (NPF). The proposed Variation is the first of a suite of variations which will result in increased housing yields on sites throughout Dublin City and will address housing delivery to the end of the current plan period. The Office also notes that the Planning Authority proposes to initiate a variation process for the rezoning of lands at City Edge (Kylemore/Inchicore) in the coming months, where it is also envisaged that the first phase of housing delivery on these lands will come forward by the end of the plan period. A further variation is proposed in 2026 relating to the wider core strategy rezoning of lands, where increased housing yields resulting from same are estimated to come forward by 2032.

The Office is generally satisfied that the changes to the City Development Plan arising from the proposed Variation are consistent with the objectives of the NPF and the Regional

Spatial and Economic Strategy for the Eastern and Midland Regional Assembly. In particular, the Office notes and welcomes the following;

- the proactive approach of Planning Authority to identify suitable, sustainable sites for housing development, which, in the case of the Masterplan could deliver up to 8,500 units when fully developed (17,000 population);
- the sustainable location of the subject lands being a short distance from the city centre with direct access to high quality public transport infrastructure and active travel both existing and planned, including DART+ West, Luas Finglas, BusConnects and the Royal Canal Greenway;
- the increased densities and reduced car dependency provided by the sustainable location of the site where densities of up to 300 units per hectare (uph) are proposed at key locations while it is assumed that a net density of 200-250uph could be achieved more generally;
- the variety in building heights from four to nine storeys throughout the lands and the recognition of the need for lower heights to the east of the site where they adjoin an established residential area; and
- the preparation of a Rainwater Management Strategy which has informed the location of Sustainable urban Drainage Systems features.

The Office does however make a recommendation in relation to the overall coordination and implementation of the Masterplan given the scale of the site, the number of stakeholders involved and the extent and timing of the necessary supporting physical and social infrastructure for housing delivery. The Office also considers that the Masterplan could be strengthened in parts as it relates to both transportation and educational provision.

This submission has been prepared to provide a strategic high-level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out three (3) recommendations under the following key themes:

Key theme	Recommendation	Observation
Implementation and monitoring	Recommendation 1	-
Transportation	Recommendation 2	-

Educational provision	Recommendation 3	-
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1. Implementation and monitoring

Any provisions for growth in the City Development Plan are required to have regard to relevant section 28 guidelines including in particular:

- Housing Growth Requirements;
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024);
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018);
- Development Plans, Guidelines for Planning Authorities (2022); and
- EU Directives on Strategic Environmental Assessment, Floods, and Birds and Habitats.

Having regard to the above, the Office welcomes the proposal to amend the land use zoning at Glasnevin, on lands to be referred to as Broombridge-Hamilton from Z6 (Employment/Enterprise) to Z14 (Strategic Development and Regeneration Area).

However, the Office has concerns relating to the implementation of the Masterplan which comprises 22 individual land development parcels within the overall site. A significant quantum of infrastructure must be coordinated to deliver the Masterplan in full and in a timely manner, including public transport, roads, utilities and social and community infrastructure. Coordination between a significant number of stakeholders will be required with respect to the foregoing including state agencies, infrastructure providers and the many landowners and occupiers of the subject lands.

Furthermore, the Office is concerned that the wording of Specific Design Objective (SDO) 8 relating to parcel level Masterplans could result in unnecessary delays to the delivery of housing whereby it is stated that ‘the first application(s) within individual development parcels will be required to produce a detailed parcel-based masterplan to accompany planning applications’. To this end the Masterplan should provide an appropriate and sufficient level of detail to avoid the requirement for further such masterplans.

While not specifically included in the wording of SDO 8, the Office notes that section 6 of the Masterplan (Implementation) states that ‘the area to be included in parcel-level masterplans will be agreed following consultation with the Planning Authority as part of the development management process’. Similar to the above in relation to the wording of SDO 8, the Office considers that such an approach could result in further unnecessary delays to the delivery of housing.

Recommendation 1 - Implementation & Monitoring

Having regard to the need to ensure the timely and coordinated implementation of all supporting elements of the Broombridge-Hamilton Masterplan with respect to the delivery of housing and in particular the following:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and
- NPO 108 of the NPF related to the monitoring of the NPF, particularly around city-based growth, compact growth and infrastructure delivery,

the Office recommends the Planning Authority to:

- (i) amend Specific Design Objective 8 of the Masterplan to remove the requirement for first applications within individual development parcels to produce a detailed parcel-based masterplan to accompany planning applications and to ensure that the Masterplan is sufficiently detailed in this regard in order to avoid any unnecessary delays to the delivery of housing;
- (ii) omit the wording of section 6 (Implementation) of the Masterplan which states that ‘the area to be included in parcel-level masterplans will be agreed following consultation with the Planning Authority as part of the development management process’, again to avoid any unnecessary delays to the delivery of housing; and
- (iii) clarify the manner in which the Planning Authority intends to support the implementation of the Masterplan.

2. Transportation

The Office welcomes the supporting text in the Masterplan related to the provision of a new pedestrian/cycle bridge across the Royal Canal. However, while it is acknowledged that a precise location has not been identified to date, it is important that any decisions in relation to same must be made in consultation with Transport Infrastructure Ireland, Irish Rail and the National Transport Authority. The Office also considers it necessary that the provision of this pedestrian/cycle connection be included as an SDO in the Masterplan to reflect the importance of the delivery of this infrastructure in the overall development of the Masterplan area.

Recommendation 2 - Transportation

Having regard to the importance of maximising connectivity for pedestrians and cyclists throughout the Broombridge-Hamilton Masterplan lands and in particular the following;

- NPO 37 of the NPF related to alternatives to the car and the prioritisation of walking and cycling;
- NPO 69 of the NPF reducing our carbon footprint; and
- Policy SMT16 of the Dublin City Development Plan 2022-2028 to prioritise the development of safe and connected walking and cycling facilities, in line with the city's mode share targets,

the Office recommends that the Planning Authority includes a Specific Design Objective related to the provision of a new pedestrian/cycle bridge across the Royal Canal and railway in consultation with the National Transport Authority, Transport Infrastructure Ireland and Irish Rail.

3. Educational provision

The Office notes and welcomes the identification of a site to the east of the Masterplan lands to accommodate two primary schools. With regard to the accommodation of post-primary schools however the Office notes that, upon occupation of approximately 60% of the anticipated residential units, the need for a post-primary school (either within or in the immediate environs of the Masterplan lands) will be assessed.

According to the Department of Education and Youth, 7.5% of a population at any given time is considered to be of post-primary school going age. Therefore, a full build out of the lands at Broombridge-Hamilton would require a post-primary school to accommodate 638 pupils. As such it is considered necessary and more appropriate at this time to address the future post-primary school requirements arising from the development of the subject lands.

Recommendation 3 - Educational Provision

Having regard to the need to facilitate appropriate and well-located educational facilities arising from the development of lands at Broombridge-Hamilton and in particular the following:

- NPO 41 of the NPF to provide for new schools on well-located sites where they contribute to the development of sustainable communities; and
- Policy QHSN53 of the Dublin City Development Plan 2022-2028 (City Development Plan) to support the provision of new schools,

the Office recommends that the Planning Authority either:

- (i) zones lands of an appropriate scale to facilitate the provision of a post-primary school within the area of the Masterplan, in consultation with the Department of Education and Youth; or
- (ii) includes a policy in the City Development Plan to identify a suitably sized and appropriately located post-primary school site outside of but in close proximity to the Broombridge-Hamilton Masterplan lands.

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 the 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.

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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
