

26th January 2026

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

**Re: 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 Proposed Variation No. 1 (proposed Variation) to the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (County Development Plan).

As Dún Laoghaire-Rathdown County 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 accordingly¹.

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

¹ 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 31st 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.

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 Variation, the Office will consider whether the plan 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 development of the area concerned.

Overview

The proposed Variation includes a change to the County Development Plan with regard to addressing the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) and the Specific Planning Policy Requirements in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) and the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025) (Apartments Guidelines).

The proposed Variation includes a number of changes to the County Development Plan with regard to the implementation of the Housing Growth Guidelines including the following elements:

- core strategy and core strategy table;
- policy amendments to reflect the new housing growth requirements and additional policies Strategic Local Objectives (SLOs) to support the revised core strategy;
- zoning amendments including rezoning of land and the introduction of new zoning objectives and amendments to the zoning matrix for Mixed-Use Inner Core (MIC) land use within the Sandymount Urban Framework Plan area; and

- amendments to various policies in relation to housing and apartment developments such as unit size, unit mix, separation distances and public/private open space.

The Office notes and welcomes the amendments proposed to the core strategy and associated core strategy table, which collectively provide a robust and coherent framework for accommodating the county's revised housing growth requirements. The updated core strategy table clearly sets out the alignment between projected growth, identified housing requirements, and the spatial distribution of zoned land, thereby strengthening the evidential basis for the county's growth strategy.

The recently published housing plan, *Delivering Homes, Building Communities 2025-2030*, emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

With regard to ensuring an adequate supply of Residential zoned land, the Office strongly welcomes the proposal to zone additional lands for residential use at Woodbrook-Shanganagh, Old Connaught and Sandyford. The identification and designation of long-term, strategic and sustainable development lands at Kiltiernan and Carrickmines is also welcomed, as this will provide clear strategic direction for future development at these locations, informed by engagement with infrastructure providers.

In order to meet the housing targets set out in the National Planning Framework First Revision (2025) (NPF) and the Housing Growth Guidelines, the Guidelines also emphasise that planning authorities should prioritise housing opportunities capable of delivery in the short-term. Having regard to this policy context, and following a review of the Multi-Criteria Assessment (MCA) of sites within existing urban and suburban areas, the Office considers that the potential for additional housing development within existing urban areas should be further examined. Any suitable lands with the capacity to facilitate housing development in the short-to-medium-term should therefore be zoned for residential use as part of the proposed Variation.

The Office also welcomes the incorporation of new and amended policies and SLOs that support the sustainable development of the proposed zoned lands, providing greater clarity and direction for future development of these key growth areas.

The Office further supports the proposed amendments to the zoning matrix for MIC lands within the Sandyford Urban Framework Plan area. These refinements will help facilitate a more balanced mix of uses, promote higher-density development where infrastructure capacity is already in place, and will reinforce Sandyford's role as a strategic employment and residential centre within the county.

While the submission does raise a concern regarding the inclusion of parking zones as a criteria for determining density ranges, the Office otherwise welcomes the proposed changes to residential development policies and objectives, updated to reflect the Apartments Guidelines and Compact Settlements Guidelines. The integration of these national standards into the County Development Plan will help ensure consistency in design quality, improved housing choice, and the promotion of compact urban forms that support sustainable mobility and efficient land use.

In addition to the potential for further housing development within existing urban areas, the submission also raises matters to be addressed regarding the flood extents identified at Old Connaught. The Planning Authority should ensure that zoning for highly vulnerable development is avoided within Flood Zones A and B and as such is required to amend the zoning to water compatible uses only at this location.

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 three (3) recommendations under the following key themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-
Density range standards	Recommendation 2	-
Flood risk management	Recommendation 3	-

1. Implementation of the housing growth requirements

As outlined above, the Office welcomes and supports the proposal to rezone lands capable of delivering 2,184 residential units at Woodbrook-Shanganagh and Sandyford, together with a further 1,050 units at Old Connaught. These strategic locations represent areas where future residential development can be delivered in a compact and sustainable manner, consistent with national policy objectives.

Similarly, the Office welcomes and supports the designation of long-term strategic and sustainable development sites at Carrickmines and Kiltiernan, in accordance with the NPF. The identification of these lands for future growth areas provides a clear and coherent strategic direction for future development beyond the current plan horizon, ensuring that the sequencing of development is aligned with infrastructure capacity and delivery timelines.

In terms of further opportunities to meet housing need, the Settlement Capacity Audit, particularly the MCA, provides a strong evidence base for identifying suitable lands for residential development. As set out in section 2.3 of the Compact Settlements Guidelines, infill and brownfield development should be considered alongside the zoning Of New Residential lands. In this regard, the Office considers that greater emphasis should be placed on maximising the development potential of underutilised lands identified through the MCA, particularly within existing serviced urban and suburban areas. These lands support compact growth and benefit from established public transport and infrastructure networks. The Planning Authority is therefore recommended to further consider undeveloped lands in existing urban and suburban locations, particularly where there is potential for the lands to be developed in the short term.

Recommendation 1 - Implementation of the Housing Growth Requirements

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:

- 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

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans,

the Planning Authority is recommended to review the undeveloped infill lands identified through the Multi-Criteria Assessment set out in the Settlement Capacity Audit, to ensure that all suitable opportunities for additional residential development are zoned accordingly, particularly where the lands have the potential to be developed in the short-term.

2. Density range standards

In relation to the updating of development density standards to align with the Compact Settlements Guidelines, the Office notes that while the accessibility criteria set out in the Guidelines are correctly applied in the identification of DLR Urban Areas and the DLR Metropolitan Area (i.e. accessibility to rail/Luas services and bus corridors), the proposed Variation additionally requires these criteria to be combined with the parking zones identified in the current County Development Plan (section 12.4.5.1 and map T2).

The net effect of this approach is that, although the Compact Settlements Guidelines criteria can reflect improvements in public transport accessibility, development density may be artificially constrained by parking zones that reflect conditions at a fixed point in time when the County Development Plan was adopted. This could distort the assessment of appropriate residential densities inconsistent with Policy and Objective 3.1 of the Compact Settlements Guidelines, which requires that the recommended residential density ranges set out in section 3.3 be applied through statutory development plans.

The Office recommends therefore that reference to 'parking zones' is omitted from the density range standards for DLR Urban Areas and DLR Metropolitan Areas.

Recommendation 2 - Density Standards

Having regard to appropriate density ranges that promote the efficient use of serviced urban land and align with public transport investment, and in particular to:

- NPO 45 of the NPF to increase residential density in settlements; and
- Policy with Policy and Objective 3.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), which requires that the recommended residential density ranges set out in section 3.3 be applied through statutory development plans,

the Planning Authority is recommended to omit reference to 'parking zones' from the density range standards for DLR Urban Areas and DLR Metropolitan Areas.

3. Flood risk management

Having reviewed the zoning maps and Strategic Flood Risk Assessment (SFRA) prepared by the Planning Authority, the Office has identified that a relatively small area of the lands zoned for A1 Sustainable Neighbourhood and Infrastructure in north-east quadrant at Old Connaught lie within Flood Zone A and B.

National Policy Objective 78 of the NPF requires planning authorities to apply a rigorous, evidence-based approach to flood risk management, ensuring that flood risk is appropriately identified, avoided, and mitigated in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The Planning Authority is therefore recommended to review and amend as necessary the zoning at this location to water compatible uses to avoid the zoning of lands for highly vulnerable development within Flood Zones A and B.

In addition, it is noted that there is an increase in the extent of the future flood extents in this area and at proposed zoning change No. 6 in the Woodbrook-Shanganagh. In this regard, the Planning Authority is recommended to set out a strategy in the SFRA for the management of the effects of climate change in these areas.

Recommendation 3 - Flood Risk Management

Having regard to:

- 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:

- (i) review the Strategic Flood Risk Assessment (SFRA) and amend the zoning at Old Connaught to water compatible uses only within Flood Zone A and B; and
- (ii) review the future flood extents within the north east portion of proposed zoning No. 1 (Old Connaught) and at proposed zoning No. 6 (Woodbrook-Shanganagh) and set out a strategy in the SFRA for the management of the effects of climate change in these areas.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

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.

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
