

21st January 2026

Niamh Lambert,
Administrative Officer,
Proposed Variation No. 10,
Planning and Property Development Department,
Block 4, Floor 3,
Dublin City Council,
Civic Offices, Wood Quay, Dublin 8.

Re: Proposed Variation No. 10 to the Dublin City Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 10 (proposed Variation) to the Dublin City Development Plan 2022-2028 (City Development Plan) regarding the Kylemore Masterplan (Masterplan).

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 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 any 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 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 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 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 Kylemore with regard to the following elements:

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

On 9th October 2025, as part of the published material relating to Variation No. 9 to the City Development Plan for lands at Broombridge-Hamilton, a report from the Chief Executive (CE's) Report of the Planning Authority, dated 9th October 2025, outlined to the elected members how it was proposed to secure the objectives of the National Planning Framework First Revision (2025) (NPF) and the NPF Implementation: Housing Growth Requirements (2025), section 28 Guidelines. The proposed Variation is the second of a suite of variations related to the CE's Report which propose to increase housing yields on sites throughout Dublin City and address housing delivery to the end of the current plan period and beyond. A further variation is proposed later in 2026 relating to the wider core strategy rezoning of lands, where increased housing yields are estimated to come forward by 2032.

The Office notes that the proposed Variation, comprising c.52 ha, forms part of a wider City Edge plan being prepared by Dublin City and South Dublin county councils. When fully developed, the 700 ha site has the potential to deliver up to 40,000 new homes and 75,000 new jobs.

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 the Planning Authority to identify suitable, sustainable sites for housing development, which, in the case of the Masterplan could deliver up to 5,300 units when fully developed (up to 14,000 population);
- the sustainable location and mixed-use regeneration and redevelopment of the area a short distance from the city centre, supported by high-quality public transport both existing and proposed, capitalising on significant state investment including the existing Kildare railway line, DART+ SouthWest, the Luas Red line, the proposed new rail station at Kylemore Road, the proposed city edge orbital route and planned bus routes, the proposed new Lucan Luas, a new Mobility Hub at the northern end of Kylemore Road at the confluence of a number of the aforementioned transport elements and the enhancement of connections and public realm spaces throughout the Masterplan area;
- the variety in building heights from three to fifteen storeys taking account of transportation corridors and the existing character of the surrounding 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 recommendations including in relation to the significance of the proposed Kylemore Mobility Hub and 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.

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 one (1) recommendation and one (1) observation under the following key themes:

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

1. Transportation

One of the key growth enablers for Dublin City as recognised in the NPF is the development of brownfield areas for housing along existing and planned high-capacity public transport corridors focusing on large-scale Transport Orientated Development (TOD) opportunities.

The Office recognises the extent of sustainable travel options that either exist or are planned within the Masterplan area and the proposed interconnectivity between bus, rail and light rail to the north of the site at the Kylemore Mobility Hub. In order to reflect the strategic significance of the proposed hub as a TOD, the Office considers that the wording of Specific Design Objective 8 should be amended to read 'public transport interchange'.

The 'public transport interchange' presents the Planning Authority and the relevant stakeholders with a significant opportunity to combine key transport infrastructure with a range of mixed uses in order to maximise the use of this central site and to add to the vibrancy of the Masterplan lands and surrounding areas which is reflected in figure 5.14, notwithstanding the illustrative nature of same. It is imperative that engagement with all relevant stakeholders including the National Transport Authority (NTA), Transport Infrastructure Ireland, Irish Rail and the relevant landowners would be undertaken as the design of the interchange progresses.

The Office notes that a preferred route is currently being considered for the Lucan Luas line. As such the Masterplan presents an opportunity for the Planning Authority to include a Specific Design Objective and to work with the NTA in order to facilitate the delivery of this line.

Recommendation 1 – Transportation

Having regard to the strategic importance of the Kylemore mobility hub, the interconnections between bus, rail and light rail to the north of the Masterplan lands, the proposed Lucan Luas line and in particular the following;

- National Planning Objective (NPO) 10 related to the delivery of Transport Orientated Development at scale at suitable locations, served by high-capacity public transport;
- NPO 69 of the NPF reducing our carbon footprint;
- Policy SMT3 of the City Development Plan to ensure the creation of an integrated transport network; and

the Office recommends that the Planning Authority:

- (i) amends the wording of Specific Design Objective 8 Kylemore Mobility Hub to replace all references to 'mobility hub' with 'public transport interchange', and to ensure that consultation with all relevant stakeholders including the National Transport Authority (NTA), Transport Infrastructure Ireland and Irish Rail will be undertaken
- (ii) ensures that the design of the public transport interchange includes adequate space for bus stopping and bus turning movements; and
- (iii) includes a Specific Design Objective to work with the NTA in order to facilitate the delivery of the Lucan Luas.

2. Implementation and monitoring

The Office notes the contents of table 6.1 (Masterplan Phasing Strategy) and, notwithstanding the comment beneath table 6.1 with regard to the indicative nature of same, considers that there are a number of elements that need to be clarified at this stage of the plan making process including the following:

- the proposed timelines associated with both Phase 1 and Phase 2;
- line 11 (of Phase 1) noting that it is unlikely that the Land Development Agency will be involved in the delivery of housing on all of the Masterplan lands, the remaining

areas of the site envisaged for housing delivery should be reflected in either Phase 1 or Phase 2 or both;

- line 4 (of Phase 1) should clarify which key access streets are proposed to be delivered;
- there is no distinction between which parks and public open spaces will be delivered as part of Phase 1 noting that the 'delivery of all remaining parks and public open space' will be delivered in Phase 2. Clarity should be provided with respect to parks and public open spaces in both phases;
- line 6 (of Phase 1) refers to the delivery of community facilities within the designated community hub and the provision of community uses on other mixed-use blocks however line 5 (of Phase 2) refers to the delivery of required community / culture facilities. Apart from the community hub, it is unclear which community facilities are referred to in either Phase 1 or Phase 2; and
- line 9 (of Phase 1) should clarify which other roads are intended to benefit from public realm upgrades.

The Office also considers that there are a number of elements that should be omitted from table 6.1 including, for example, line 12 (construction management plans) which would typically form part of the development management process.

Taking account of the various elements related to table 6.1, a significant quantum of infrastructure must be coordinated to deliver the Masterplan in full and in a timely manner, including the proposed relocation of the Seveso site, development of new public transport infrastructure, roads, utilities, social and community infrastructure and public realm works. 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 current site.

Observation 1 – Implementation & Monitoring

Having regard to the need to ensure the timely and coordinated implementation of all supporting elements of the Kylemore Masterplan with respect to the delivery of housing and in particular NPO 108 of the NPF related to the monitoring of the NPF, particularly around city-based growth, compact growth and infrastructure delivery, the Planning Authority is requested to:

- (i) provide clarity around the timelines associated with both Phase 1 and Phase 2 related to table 6.1 (Masterplan Phasing Strategy);
- (ii) review and update table 6.1 in order to clarify which elements are proposed to be delivered in both Phase 1 and Phase 2; and
- (iii) clarify how it intends to support the implementation of the Masterplan, particularly in relation to the delivery of the necessary supporting physical infrastructure, in order to ensure the timely delivery of housing.

Summary

The Office requests that your authority addresses the one recommendation and one observation as outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58 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.

Is mise le meas,

AM O'Connor.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
