

Dublin City Development Plan 2022- 2028: Variation No. 11

Strategic Environmental Assessment (SEA) Statement

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Contents

Glossary	i
1 Introduction	3
1.1 Overview	3
1.2 Description of Variation No.11 to the Dublin City County Development Plan 2022-2028.....	4
1.3 Appropriate Assessment	5
1.4 Strategic Flood Risk Assessment (SFRA)	6
1.5 Content of the Strategic Environmental Assessment Statement.....	6
1.6 SEA Stages and Process	7
2 Integration of Environmental Considerations into the Plan	9
2.1 Introduction.....	9
2.2 SEA Consultation	9
2.2.1 SEA Scoping Consultation	9
2.2.2 Draft Plan Consultation.....	11
2.2.3 Adoption of Variation No.11.....	19
3 SEA Environmental Report	20
3.1 Strategic Environmental Objectives.....	21
4 Assessment of Effects of Variation No. 11.....	23
4.1 Mitigation Measures	23
5 Assessment of Alternatives.....	27
5.1 Introduction.....	27
5.2 Option 1: Review of Z9 Amenity / Open Space Lands / Green Network	27
5.3 Option 2: Z15 Community & Social Infrastructure.....	28
5.4 Option 3: Strategic Development and Regeneration Areas (SDRAs) & Z6/Z7	28
5.5 Assessment of Alternatives	28
5.6 Reasoning for Selection of the Preferred Alternative	31
6 Monitoring.....	32
7 References	33



Glossary

Appropriate Assessment

The obligation to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC. AA is a focused and detailed impact assessment of the implications of a strategic action or project, alone and in combination with other strategic actions and projects, on the integrity of a Natura 2000 site in view of its conservation objectives.

Biodiversity and Flora and Fauna

Biodiversity is the variability among living organisms from all sources including inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems' (United Nations Convention on Biological Diversity 1992).

Flora is all of the plants found in a given area.

Fauna is all of the animals found in a given area.

Environmental Problems

Annex I of Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the assessment of the effects of certain Plans and programmes on the environment (the Strategic Environmental Assessment Directive) requires that information is provided on 'any existing environmental problems which are relevant to the plan or programme', thus, helping to ensure that the proposed strategic action does not make existing environmental problems worse.

Environmental problems arise where there is a conflict between current environmental conditions and ideal targets. If environmental problems are identified at the outset they can help focus attention on important issues and geographical areas where environmental effects of the plan or programme may be likely.

Environmental Vectors

Environmental vectors are environmental components, such as air, water or soil, through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings.

Mitigation Measures

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing a human action, be it a plan, programme or project. Mitigation involves ameliorating significant negative effects. Where there are significant negative effects, consideration should be given in the first instance to preventing such effects or, where this is not possible, to lessening or offsetting those effects.

Protected Structure

Protected Structure is the term used in the Planning and Development Act and Regulations (as amended) to define a structure included by a planning authority in its Record of Protected Structures. Such a structure shall not be altered or demolished in whole or part without obtaining planning permission or confirmation from the planning authority that the part of the structure to be altered is not protected.

Recorded Monument

A monument included in the list and marked on the map which comprises the Record of Monuments and Places that is set out County by County under Section 12 of the National Monuments (Amendment) Act, 1994 by the Archaeological Survey of Ireland. The definition includes Zones of Archaeological Potential in towns and all other monuments of archaeological interest which have so far been identified. Any works at or in relation to a recorded monument requires two months' notice to the former Department of the Environment, Heritage and Local Government (now Department of Arts, Heritage and the Gaeltacht) under Section 12 of the National Monuments (Amendment) Act, 1994.

SEA (Strategic Environmental Assessment)

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt it.

SEA Scoping

Scoping is the process of determining what issues are to be addressed, and setting out a methodology in which to address them in a structured manner appropriate to the plan or programme. SEA coping is carried out in consultation with appropriate environmental authorities.

Strategic Actions

Strategic actions include: Policies / Strategies, which may be considered as inspiration and guidance for action and which set the framework for Plans and programmes; Plans, sets of coordinated and timed objectives for the implementation of the policy; and Programmes, sets of projects in a particular area.

Strategic Environmental Objective (SEO)

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies which generally govern environmental protection objectives established at international, Community or Member State level and are used as standards against which the provisions of the Masterplan and the alternatives can be evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects – unmitigated

1 Introduction

1.1 Overview

This is the Strategic Environmental Assessment (SEA) Statement for Variation 11 of the Dublin City Development Plan 2022-2028 (hereafter referred to as 'Variation 11' or 'the Plan').

The Dublin City Development Plan 2022-2028 was adopted on 2 November 2022 and came into effect on the 14 December 2022. The Plan has been subject to a number of variations since its adoption.

In April 2025 the *National Planning Framework (NPF) First Revision* was adopted to address evolving challenges in relation to climate change, housing, regional development and population growth. In July 2025 following the approval of the Revised NPF, the Department of Housing, Local Government and Heritage published the *NPF Implementation: Housing Growth Requirements Guidelines* in accordance with Section 28 of the Planning and Development Act 2000. The *NPF Housing Growth Requirements Guidelines* will replace the *Housing Supply Target Methodology for Development Plan Guidelines for Planning Authorities*, published in December 2020. Local authorities are required to update development plans to reflect the national targets given by the Department.

The Planning and Development Act 2024 (as amended), mandates that the City Development Plan is consistent with the National Planning Framework and the Regional Spatial and Economic Strategy. Accordingly, Dublin City Council has taken a number of steps to integrate the updated housing figures into the Core Strategy to ensure consistency with the planning hierarchy.

The Chief Executive's Report (No.237/2025) in relation to the above referred guidelines outlines to the elected members of Dublin City Council how the Council can secure the objectives of the National Planning Framework First Revision (2025) (NPF) and the Section 28 Guidelines.

In addition to updating the text of the Development Plan to reflect the First Revision of the National Planning Framework and the Section 28 Guidelines, the Chief Executive's Report identifies the following 3-step approach:

- 1) The rezoning of lands at (a) Broombridge – Hamilton and (b) Kylemore / Inchicore Lands (City Edge),
- 2) The review and reassessment of potential rezoning of lands in the existing Strategic Development Regeneration Areas (SDRAs), and
- 3) The review and potential rezoning of some employment / industrial (Z6/Z7) lands.

In respect of **Step 1** above, lands at **Broombridge – Hamilton** have been rezoned (Variation No. 9 adopted 12 January 2026) from Z6 Employment / Enterprise to Z14 Strategic Development Regeneration Areas (SDRAs), and the Development Plan now incorporates a new Broombridge – Hamilton SDRA comprising a detailed masterplan which anticipates provision of 8,500 housing units. The referred statutory variation process was subject to Strategic Environmental Assessment and Appropriate Assessment.

In December 2025, Dublin City Council initiated the statutory variation process (Variation No. 10) for the rezoning of lands at **City Edge (Kylemore/Inchicore)** from Z6 Employment / Enterprise to Z14 Strategic Development Regeneration Areas (SDRAs), and the incorporation of a new Kylemore / Inchicore SDRA in the Plan comprising a detailed masterplan (identifying provision for 5,300 housing units). The statutory variation process includes public consultation, Strategic Environmental

Assessment and Appropriate Assessment and is subject to the approval of the Elected Members of Dublin City Council. Variation No. 10 was made on 22nd June 2026.

This variation (No.11) addresses the review and rezoning of lands arising from the review processes carried out in **Step 2** and **Step 3** above.

Brady Shipman Martin (BSM) was appointed by Dublin City County Council to carry out the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) in respect of Variation No.11 of the Dublin City Development Plan 2022-2028. This SEA Statement should be read in conjunction with Variation No. 11, the Strategic Environmental Assessment Environmental Report, and the AA Screening, Natura Impact Report (NIR) and the Strategic Flood Risk Assessment (SFRA).

This SEA Statement is a reflective document that looks back on the SEA process, what has been achieved and it also sets out what monitoring will be done in the future.

1.2 Description of Variation No.11 to the Dublin City County Development Plan 2022-2028

Variation No.11 has been prepared in response to the recent changes in National Planning Policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of Section 28 Guidelines, NPF Implementation: Housing Growth Requirements, Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended), both published in 2025.

Variation No. 11 is being brought forward to contribute to delivering the NPF housing requirement set out by the NPF Implementation Circular. The measures set out in the Variation primarily relate to the following amendments.

It is proposed to vary the Dublin City Development Plan 2022 – 2028 to incorporate the housing growth requirements set out in the First Revision to the National Planning Framework, April 2025, and as set out in the Guidelines - National Planning Framework NPF Implementation: Housing Growth Requirements, Guidelines for Planning Authorities, 2025 (refer to text of Draft Variation No.11 for full details).

It is proposed to vary the Dublin City Development Plan 2022 – 2028, by making the following amendments:

1. Update housing growth requirements in the Core Strategy (Chapter 2) of the 2022 – 2028 City Development Plan (CDP), to reflect the NPF First Revision and the NPF Implementation Guidelines.
2. Rezone the following lands zoned Land Use Zoning Objective Z6 – Employment/Enterprise at:
 - a) East Point Business Park, Dublin 3 – To: Land Use Zoning Objective Z14 Strategic Development and Regeneration Areas (SDRAs).
 - b) Lands at East Wall Road, Dublin 3 – To: Land Use Zoning Objective Z14Z14 Strategic Development and Regeneration Areas (SDRAs).
 - c) Lands at North Road, Dublin 11 – To: Land Use Zoning Objective Z10: Z10 Inner Suburban and Inner City Sustainable Mixed-Uses.
 - d) Shanowen Road Lands, Whitehall/Santry, Dublin 9 – To: Land Use Zoning Objective Z1: Sustainable Residential Neighbourhoods).
 - e) Finglas Business Park, Tolka Valley Road, Dublin 11 - To: Land Use Zoning Objective Z10: (Z10 Inner Suburban and Inner City Sustainable Mixed-Uses.

- f) Greenmount Industrial Estate, Harold's Cross, Dublin 6 - To: Land Use Zoning Objective Z10 (Z10 Inner Suburban and Inner City Sustainable Mixed-Uses.
 - g) Part of Fumbally Lane / Malpas Street / Blackpitts Lands, Dublin 8 - To: Land Use Zoning Objective Z10: Z10 Inner Suburban and Inner City Sustainable Mixed-Uses.
3. Amend the core strategy relating to the following Strategic Development and Regeneration Areas (SDRA's): No.'s 3 Finglas Village Environs & Jamestown lands; No. 5 Naas Road; No. 6 Docklands; No. 7 Heuston and Environs; No. 8 Grangegorman / Broadstone; No. 10 North East Inner City; No. 12 Dolphin House; No. 13 Market Area & Environs, to achieve additional housing capacity.
 4. Amend Objective CSO4 'Programme for the Preparation of Local Area Plans/Village Improvement Plans' by prioritising a framework plan for Santry.
 5. To make corresponding adjustments and additions to text, tables and graphics in the Dublin City Development Plan 2022-2028, and update references and text relating to the National Planning Framework First Revision.

The proposed rezonings are outlined in **Table 1.1**

Table 1.1: Proposed Re-Zonings

No.	Map Ref.	Area (ha)	Site Location	Potential Rezoning	SDRA
1	F1	17.6	Lands at East Point Business Park Dublin 3	Z14 Strategic Development and Regeneration Areas (SDRAs)	SDRA 6 Docklands
2	F2	5.1	Lands at East Wall Road Dublin 3	Z14 Strategic Development and Regeneration Areas (SDRAs)	SDRA 6 Docklands
3	A2	7.1	Lands at North Road Dublin 11	Z10 Inner Suburban and Inner City Sustainable Mixed-Uses	Southern part in SDRA 3 Finglas Village Environs and Jamestown Lands
4	B7	4.3	Shanowen Road Lands Whitehall / Santry, Dublin 9	Z1 Sustainable Residential Neighbourhoods	
5	A6	1.9	Finglas Business Park Tolka Valley Road, Dublin 11	Z10 Inner Suburban and Inner City Sustainable Mixed-Uses	
6	H1	1.5	Greenmount Industrial Estate Harold's Cross, Dublin 6	Z10 Inner Suburban and Inner City Sustainable Mixed-Uses	
7	E17	0.2	Lands at Fumbally Lane / Malpas Street / Blackpitts Lands Dublin 8	Z10 Inner Suburban and Inner City Sustainable Mixed-Uses	SDRA 15 Liberties & Newmarket Square
Total ha			c.15ha outside SDRA		c.23 in SDRA

1.3 Appropriate Assessment

The EU Habitats Directive (92/43/EEC) requires an Appropriate Assessment (AA) to be carried out where a plan or project is *likely to have a significant impact* on a Natura 2000 site. Natura 2000 sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

Stage 1 is to establish whether AA is required for the particular plan or project. This stage is referred to as 'screening for the requirement for AA', and its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project, alone or in combination with other plans

or projects, could have significant effects on a Natura 2000 site, in view of the site's conservation objectives.

As set out in Department Circular Letter SEA 1/08 & NPWS 1/08¹ (15 February 2008), Screening for AA is of relevance to SEA screening in that *“where following screening, it is found that the draft plan or amendment may have an impact on the conservation status of a Natura 2000 site or that such an impact cannot be ruled out, adopting the precautionary approach:*

- *An AA of the plan must be carried out, and*
- *In any case where SEA would not otherwise be required, it must also be carried out.”*

Hence, where a plan requires AA, it shall also require SEA.

Draft Variation No.11 was screened for Appropriate Assessment (AA) in accordance with Article 6(3) of the Habitats Directive (92/43/EEC of 21 May 1992) and it was concluded that potential for effects on the integrity of European sites cannot be excluded beyond all reasonable scientific doubt and a Natura Impact Report (NIR) has been prepared.

The AA Screening and NIR accompanied the Draft Variation No.11 and the SEA Environmental Report on public display.

1.4 Strategic Flood Risk Assessment (SFRA)

The Variation No.11 has been subject to a Strategic Flood Risk Assessment (SFRA) prepared with regard to the requirements of The Planning System and Flood Risk Assessment Guidelines for Planning Authorities² (2009) and Circular PL02/2014 (August 2014).

Justification Stage Tests were carried out for two rezonings (H1: Greenmount Industrial Estate, Harold's Cross, Dublin 6; and E17: Lands at Fumbally Lane / Malpas Street / Blackpitts, Dublin 8).

The conclusion of the SFRA is that all sites that were subject to the Justification Test have passed. Notwithstanding this, any future planning applications relating to these lands should be accompanied by a Stage 3 Detailed Flood Risk Assessment, to be undertaken on a site-specific basis where required. This will ensure that flood risk is appropriately assessed and managed at project level in accordance with the OPW Guidelines and the Dublin City Development Plan Strategic Flood Risk Assessment (SFRA).

The SFRA accompanied the Draft Variation No.11 and the SEA Environmental Report on public display.

1.5 Content of the Strategic Environmental Assessment Statement

In accordance with Article 12(1) of the European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025, the SEA Statement will summarise the following:

- (a) *how environmental considerations have been integrated into the plan,*
- (b) *how—*
 - (i) *the environmental report prepared under Regulation 8,*
 - (ii) *submissions and observations made to the competent authority in response to a notice under Regulation 9 or Part 3 of the Act, and*
 - (iii) *any consultations under Regulation 10,*

¹ NPWS SEA letter: <https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf>

² Department of Environment, Heritage and Local Government: <https://www.opw.ie/en/media/Planning%20Guidelines%20-%20FRM%20-%20Nov%202009.pdf>

- have been taken into account during the preparation of the plan,*
- (c) *the reasons for choosing the plan, as adopted, in the light of the other reasonable alternatives dealt with, and*
- (d) *the measures decided upon to monitor, in accordance with Regulation 14 the significant environmental effects of implementation of the plan.*

1.6 SEA Stages and Process

The key focus of SEA is to take environmental issues, and in particular ‘*likely significant environmental effects*’ of a plan or programme (P / P), into consideration during the P / P making process. The key stages in the SEA process as they relate to Variation No. 11 of the DCDP are outlined in **Table 1.2** below.

Table 1.2 Outline of the SEA Process

Stage	Description	Status
1. Screening	The requirement to undertake a SEA is mandatory for certain Plan / Programme (P / P). Where SEA is not a mandatory requirement, the P / Ps is subject to a ‘Screening process’, to consider if it is <i>likely to have significant effects</i> on the environment, and therefore, if SEA is required. The preparation of the <i>Draft Variation</i> was screened for Appropriate Assessment (AA) and it was concluded that potential for effects on the integrity of European sites cannot be excluded beyond all reasonable scientific doubt and is required to undergo Appropriate Assessment. Therefore, in accordance with <i>Circular Letter SEA 1/08 & NPWS 1/08</i> the <i>Draft Variation</i> was also required to undergo a Strategic Environmental Assessment (SEA) in accordance with <i>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</i> (known as the SEA Directive).	Completed 
2. Scoping	Preparation of a SEA Scoping Report highlighting that the Environmental Report is required to include: ■ methods of assessment; ■ contents and level of detail in the Plan / Programme; ■ the stage in the Plan or Programme-making process; and ■ the extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment. Scoping provides for consultation with the Environmental Authorities specified in S.I. No. 456 of 2025, and the process allows for incorporation of the views of the environmental authorities within the P / P and the SEA Environmental Report.	Completed 

Stage	Description	Status
3. Environmental Report	Preparation of a systemic identification and evaluation of alternatives and assessment of the <i>likely significant environmental effects</i> of implementing the P / P. The findings of the assessment, which is carried out at various stages in the P / P making (e.g. Draft, Amended Draft etc.), are provided in the SEA Environmental Report in accordance with Article 12 (including Schedule 2) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011. The output from this stage is an Environmental Report which accompanied the draft P / P required on public display.	Completed 
4. SEA Statement	Completion / adoption of the Plan, taking account of <i>likely significant environmental effects</i>, any submissions or observations received from consultations and integration of mitigation and monitoring measures within the Plan. The Environmental Report is concluded and an SEA Statement is prepared in accordance with Article 12(1) of S.I. No. 456 of 2025, as noted in Section 1.5 of this report (above).	Current Stage
5. SEA Monitoring	The Plan is adopted and implemented, and the environmental effectiveness of the implementation of the Plan is monitored and reported on through the life of the Plan.	On-going Stage

2 Integration of Environmental Considerations into the Plan

2.1 Introduction

This section details how both the SEA Environmental Report and submissions and observations made to Dublin City Council on the Environmental Report and SEA process have been taken into account during the preparation of Variation No. 11 of the DCDP.

The SEA and AA team worked with the Plan-preparation team at Dublin City Council in order to integrate requirements for environmental protection and management into the Plan. Consideration has been given to the requirement to undertake environmental assessment of this Plan in order to ensure full legal compliance and to further integrate protection, enhancement and promotion of the environment in developing and implementing the Plan.

2.2 SEA Consultation

A number of opportunities are integrated into the plan-making process to allow for consultation with the environmental authorities and the general public on the plan and SEA. Submissions and observations were made at each of these stages, and these informed the preparation and finalisation of the Plan and the SEA process.

2.2.1 SEA Scoping Consultation

SEA Scoping (Stage 2) consultation with the Environmental Authorities specified in Article 2(1) of S.I. No. 456 of 2025 and for incorporation of the views of the Environmental Authorities within the Plan or Programme and the SEA Environmental Report.

SEA Scoping consultation was undertaken with the following Environmental Authorities between 20 February 2026 and 20 March 2026:

- Environmental Protection Agency (EPA);
- The Minister for Housing, Local Government and Heritage;
- The Minister for Housing, Local Government and Heritage, Development Applications Unit;
- The Minister for the Climate, Energy and the Environment;
- The Minister for Agriculture, Food and the Marine;
- Fingal County Council;
- Dún Laoghaire Rathdown County Council;
- South Dublin City Council.

Submissions / observations on the scoping of the Environmental Report received from environmental authorities informed the Variation and Environmental Report as set out in **Table 2.1**.

Table 2.1 SEA Scoping Submissions / Observations from Environmental Authorities

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
Environmental Protection Agency (EPA)	Ensure that the Variation aligns with key higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the revised National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region.	The information provided has informed the preparation of the Variation and the Environmental Report.

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	Climatic factors should be considered with reference to the most up to date Climate Action Plan and relevant Flood Risk Management Plan. The Variation should align with national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation plans.	These factors have informed the preparation of the Environmental Report.
	The availability and capacity of existing critical infrastructure including wastewater and water supply should be considered in the context of the likely population increase associated with the proposed housing target being accommodated.	The information provided has informed the preparation of the Draft Variation and the Environmental Report.
	Reference is provided to the Environmental Monitoring set out in Table 7.1 of the revised NPF's SEA Statement. This monitoring should be reflected, where relevant and appropriate, in the context of future, environmental monitoring and related reporting associated with the revised CDP implementation.	This is noted. In addition as a Variation to the Development Plan, monitoring as detailed in the Environmental Report prepared for the Development Plan remains relevant to Variation as noted in this Environmental Report.
	The Submission provides links to a range of SEA guidance and resources.	The information provided has informed the preparation of the Environmental Report.
Department of Housing, Local Government and Heritage	The submission notes the following: - In addressing architectural heritage as part of the SEA process, it will be necessary to identify the relevant heritage assets. This will include heritage assets which are subject to statutory protection under the Planning and Development Act, namely protected structures, architectural conservation areas and areas of special planning control and non-statutory heritage assets that may be covered by policies and objectives in a local authority's development plan. - Submission provides definitions for aspects of architectural heritage. - Notes sections from Chapter 8 of Development Plan relating to built heritage. - Have regard to Ministerial Guidelines '<i>Architectural Heritage Protection: Guidelines for Planning Authorities</i>'. - Proximity of new zonings to ACAs architectural conservation areas and protected structures, their curtilage/s and/or associated historic demesne/s	The information provided has been reviewed and has informed the preparation and assessment of the Environmental Report. It is noted that all of the proposed zonings in the Draft Variation involve rezoning from an existing development land use in the current City Development Plan, as varied, to a different development land use.

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	■ New zonings should align with architectural heritage policies and objectives in the Development Plan. ■ Inter-relationships: There is a direct relationship between architectural heritage and landscape, in particular, but not restricted to designed demesnes landscapes, urban parks and squares or public places, coastal and town defenses, civic and institutional spaces and gardens. Many of these landscapes can form part of the curtilage of a protected structure and/or be located within an Architectural Conservation Area. The potential impact on these landscapes will need to be considered under both cultural heritage and landscape and visual as part of the SEA process. ■ Chapter 13 of Architectural Heritage Protection-Guidelines for Planning Authorities sets out particulars and considerations relating to curtilage and attendant grounds.	

2.2.2 Draft Plan Consultation

The Draft Variation, together with the SEA Environmental Report, Natura Impact Report (NIR) and Strategic Flood Risk Assessment were placed on public display between 31 March 2026 and 28 April 2026. 292 submissions / observations were received. The submissions are summarised in **Table 2.2**.

The consultation process included submissions / observations from the following:

- Office of the Planning Regulator;
- National Transport Authority;
- Transport Infrastructure Ireland;
- Department of Transport;
- Department of Education and Youth;
- Land Development Agency;
- Office of Public Works;
- Department of Housing, Local Government and Heritage;
- Environmental Protection Agency;
- Uisce Eireann;
- Maritime Are Regulatory Authority;
- Electricity Supple Board; and
- Fingal County Council.

A number of submissions received expressed broad support for the overall strategic approach set out in the proposed variation, particularly its alignment with the revised National Planning Framework (2025) and the Section 28 Housing Growth Requirements Guidelines (2025), as well as its objective to facilitate increased housing delivery within Dublin City. This support included submissions from statutory bodies, notably the Office of the Planning Regulator, alongside responses from members of the public and other stakeholders. While supporting the overarching framework, many submissions

also raised detailed observations and recommendations. Responses to submissions are detailed within the Chief Executive's Report No. 113/2026.

Dublin City Council prepared a Chief Executive's Report (May 2026) to present the outcomes of the consultation process carried out on Proposed Variation No.11 to the Dublin City Development Plan 2022-2028, as varied. Its primary function is to list and summarise the main issues raised in the submissions received during the consultation process and to provide recommendations in response to the submissions. This report, which was issued to the Elected Members of Dublin City Council for consideration, included minor modifications to the Draft Variation based on the submissions received. These minor modifications were screened out for the requirement for Appropriate Assessment and/or Strategic Environmental Assessment.

Table 2.2 Summary of Responses by Statutory/Prescribed Bodies to the Draft Plan

Statutory/Prescribed Body	Summary of Response
Office of the Planning Regulator	Recommendation 1 – Flood Risk Management ▪ <i>NPO 78 of the NPF (in relation to flood risk management);</i> ▪ <i>RPO 7.12 of the RSES (to avoid inappropriate land use zonings and development in areas at risk of flooding); and</i> ▪ <i>Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);</i> the Office recommends that the Planning Authority: ▪ <i>takes account of the updated mapping contained within the National Coastal Flood Hazard Maps (NCFHM) and Jamestown Masterplan in respect of Sites F1, F2 and A2. Where it is found that highly vulnerable development (Flood Zones A/B) or less vulnerable development (Flood Zone A) is proposed and the Plan Making Justification Test has not been passed, the Planning Authority is required to amend the proposed land use zonings to water compatible uses only; and,</i> ▪ <i>transposes any recommendation into the plan in the form of an objective on the site and cross-reference it in the relevant zoning map.</i> Observation 1 - Flood Risk Management – Climate Change Scenario Having regard to flood risk management and in particular to: ▪ <i>NPO 78 of the NPF (potential impacts of climate change on flooding and flood risk);</i> ▪ <i>RPO 3.7 and 7.12 of the RSES (to avoid inappropriate land use zonings and development in areas at risk of flooding); and</i> ▪ <i>the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);</i> the Planning Authority is advised to amend the Strategic Flood Risk Assessment to discuss how potential future climate change risk and any associated mitigation measures have been considered in relation to Sites F1, F2 and E17. The Office of Public Works should be consulted in relation to the Planning Authority's response. Observation 2 – Transportation Having regard to: ▪ <i>NSO 2 and 5 of the NPF (in relation to enhanced regional accessibility and sustainable mobility);</i> ▪ <i>RPO 5.2, 5.3, 8.1, 8.2 and 8.3 of the RSES (in relation to sustainable transport, integrating transport and land use planning, maximising efficiency and protecting the strategic capacity of the transport network);</i>

Statutory/Prescribed Body	Summary of Response
	▪ <i>Spatial Planning and National Road Guidelines—Guidelines for Planning Authorities (2012);</i> ▪ <i>Sections 8.2 and 13.3 of the NTA Greater Dublin Area Transport Strategy 2022-2042 related to national roads as well as integrating land use and transport planning; and</i> ▪ <i>Sections 8.5.6 and 8.5.8 Dublin City Development Plan 2022-2028 related to sustainable transport modes, streets, roads, bridges and tunnel infrastructure;</i> The Office advises that, prior to the adoption of the proposed Variation, the Planning Authority engages with TII and NTA in relation to Amendments 16, 17, 18 and 21 in order to ensure the protection of the Dublin Tunnel and the Motorway Traffic Control Centre. The guiding principles for the masterplan for the lands at East Point Business Park (Site 21 Amendment 16) should stipulate that the public transport path facilitate modern electric bus vehicles and that provision will be made for buses to terminate, turnaround and layover within the site.
National Authority Transport	<i>Key Opportunity Sites 19 and 20 – East Wall Road / Bond Road</i> The NTA's submission refers to Proposed Amendments 16, 17, 18 and 21, which relate to Key Opportunity Sites 19 and 20 located adjacent to the Dublin (Port) Tunnel, the Port Tunnel Access Road and the Dublin Tunnel Control Building, including the Motorway Traffic Control Centre (MTCC). <i>SDRA 6 – Site 21: East Point Business Park</i> The NTA notes the principles set out for EastPoint Business Park, which promote public transport and active travel. The submission outlines a number of further details relating to: ▪ the provision of an internal public transport route capable of accommodating modern electric buses and taken in charge by the local authority; ▪ the provision of bus gates, stops, shelters and facilities for bus termination, turnaround and layover within the site; ▪ the identification of public transport connections to adjoining areas, including links towards The Point Square and Clontarf DART Station; ▪ the delivery of walking and cycling routes through the site with connections to existing external networks; and ▪ the continued protection of the primary function of the Dublin Tunnel.
Transport Infrastructure Ireland	TII's submission raises concerns in respect of Proposed Amendments 16, 17, 18 and 21 of Variation No. 11 insofar as they relate to Key Opportunity Site 19 (East Wall Road / Bond Road) and Site 20 (site adjacent to the Tunnel Control Building). The principal issues identified by TII relate to the protection of the Dublin Tunnel and its associated Control Building, including the Motorway Traffic Control Centre (MTCC), which TII identifies as nationally critical transport infrastructure with 24-hour operational, safety, capacity and security requirements. TII contends that the proposed amendments could adversely affect the continued operation and functionality of this infrastructure. In particular, TII raises concerns regarding:

Statutory/Prescribed Body	Summary of Response
	- the potential designation of zoning and development objectives which, in its view, may be incompatible with access, traffic management and operational requirements associated with the Dublin Tunnel and MTCC; - the adequacy of the mapped objectives under Amendment 21 and the associated written statement under Amendment 16 in addressing the requirements of nationally important transport infrastructure; - the absence of sufficient evaluation of operational, functional and security considerations relating to the Dublin Tunnel and the MTCC; - the implications of introducing sensitive land uses, including residential development, in close proximity to infrastructure operating on a 24-hour basis, and the need to mitigate potential impacts including noise, vibration, emissions, lighting and servicing requirements; - the lack of clarity regarding the proposed site-specific masterplan referenced for Site 19, including uncertainty as to responsibility for its preparation, its statutory status and consultation mechanisms; and - the absence of corresponding provisions for Site 20 notwithstanding its proximity to the Tunnel Control Building and the MTCC. TII considers Proposed Amendments 16, 17, 18 and 21 to be premature and recommends that they not be adopted until the compatibility of Sites 19 and 20 with the Dublin Tunnel and the MTCC has been fully evaluated, and until further consultation with TII has taken place. TII requests that the proposed variation be reviewed and amended accordingly.
Department of Transport	The Department's submission highlights the Climate Action Plan target to transition 30% of the national vehicle fleet to electric vehicles (EVs) by 2030, with private vehicle electrification expected to deliver significant emissions reductions in the short to medium term. It is noted that a key requirement to achieve this target is the provision of a comprehensive and accessible public EV charging network, including en-route, neighbourhood and destination charging locations. The Department notes: - delivery of EV charging stations will be guided by both the National Road Network EV Charging Plan and the Regional and Local EV Charging Network Plan; and - Local Authority Development Plans and Area Plans should make explicit provision for EV charging infrastructure in line with national policy, incorporating EV infrastructure in new development wherever possible.
Department of Education and Youth	The Department notes the projected annual housing growth requirements of approximately 8,196 units per annum between 2026 and 2034 and 6,075 units between 2035 and 2040 generating a total residential yield of over 73,000 units. The Department's assessment is based on anticipated future school place requirements to 2034. It states that the assumed population yield of 2 persons per dwelling may underestimate actual demand, given CSO household averages for the city of 2.4–2.5 persons, thereby increasing pressure on education infrastructure. The submission emphasises that substantial population growth will place pressure on existing schools to cater for additional school place requirements.

Statutory/Prescribed Body	Summary of Response
	The Department provides settlement-specific observations for several areas across the greater Dublin area. The Department notes the following areas that will need the expansion of facilities, up to and including new schools: ▪ Docklands ▪ Dolphin House ▪ Heuston and Environs ▪ North East Inner City ▪ Finglas and Jamestown ▪ Kylemore ▪ Naas Road ▪ Santry KUV
Land Development Agency	The LDA considers that the proposed review of the Core Strategy and the assessment of underutilised Z6 Employment/Enterprise lands represent an appropriate and timely response to national policy. The LDA strongly supports the emphasis within the proposed Variation on identifying and activating public lands for residential development. The submission notes that a number of the sites proposed for rezoning or identified as Key Opportunity Sites are already included in the LDA's Report on Relevant Public Lands 2025, which lends further support to their inclusion in the Variation. The LDA welcomes the proposed rezoning of lands from Z6 Employment/Enterprise to residential, mixed-use, or SDRA zoning objectives, noting that these changes will facilitate housing-led regeneration while remaining aligned with national compact growth objectives. The Agency specifically supports the rezoning of two public land sites previously identified in its Report on Relevant Public Lands 2025.
Office of Public Works – Estate Portfolio Delivery Unit	<i>Custom House / IFSC / George's Dock Area</i> The OPW notes the Council's identification of the Custom House, IFSC and George's Dock area as a strategically important historic, civic and economic district within the North Docklands, and acknowledges the view that the area is entering a new phase of evolution. The OPW is broadly supportive of the proposed guiding principles, including: ▪ Reinforcing the Custom House as a national civic symbol and key element along the Liffey quays; ▪ Supporting enhanced public access and a pedestrian-priority civic space along Custom House Quay; and ▪ The integration of public realm, green infrastructure and heritage-sensitive design. However, the OPW notes that the proposed Variation also seeks to facilitate a high-density, mixed-use quarter within this area. In this regard, it considers that the preparation of a framework plan would be appropriate in order to ensure an appropriate balance between heritage protection and urban development objectives. <i>SDRA 7 – Heuston and Environs</i> The OPW notes that no amendments are proposed to the guiding principles or spatial strategy for SDRA 7. However, it considers that the increased densities

Statutory/Prescribed Body	Summary of Response
	proposed elsewhere in the Variation may give rise to more intensive forms of development within this area. The OPW requests that existing heritage and landscape protections, including the cone-of-vision protections associated with the Royal Hospital Kilmainham, continue to be treated with sensitivity. <i>Santry – Shanowen Road (Santry Garda Station)</i> The OPW notes the proposed rezoning of lands at Shanowen Road, Santry from Z6 Employment/Enterprise to Z1 Sustainable Residential Neighbourhoods. The OPW advises that Santry Garda Station is located within these lands and that the site represents a strategically important landholding for An Garda Síochána within the Dublin region. The lands form part of a portfolio under consideration for expanded Garda use in accordance with the National Development Plan. On this basis, the OPW considers that residential zoning is not appropriate at this location. The OPW has indicated its availability to engage further with the Council as the Variation process progresses.
Department of Housing, Local Government and Heritage	The Department is in general agreement with the conclusions of the SEA Environmental Report and the AA Natura Impact Report, in that the identified mitigation measures, in combination with the policies of the City Development Plan, should prevent and mitigate any possible adverse environmental effects which may arise due to the implementation of the proposed Variation, including any negative effects on European sites. The Department notes from past surveys, that, otters pass/traverse the lands at Docklands Station (Site 17), and that sprainting sites have been found at the edge of Eastpoint Business Park (Site 21) / the Docklands. The Department states that the proposed amendments and rezoning could have significant adverse effects on otters which are protected under the Habitats Directive (92/43/EEC). It is therefore seeking that provision should be made in the sections of Amendment 16 relating to sites 17 and 21 for this species conservation. The Department is seeking text to be inserted under Amendment 16 for Site 17 Docklands Station stating that the masterplan should provide for the continued usage and free movement of otter, including the installation of an artificial otter holt. The Department is seeking text to be inserted under Amendment 16 for Site 21 EastPoint Business park stating that the public realm should include the provision of an artificial holt within its landscaping to promote the continued usage by otter.
Environmental Protection Agency	The EPA's submission sets out guidance and advisory comments with respect to: the Content of the Environmental Report regarding Mitigation Measures (ensuring clear commitments to implement the mitigation measures) and Monitoring. In reference to Monitoring, the EPA promotes the following:

Statutory/Prescribed Body	Summary of Response
	▪ any monitoring programme should be flexible – adaptable to unforeseen adverse impacts and ensuring where adverse impacts may occur, suitable, effective remedial action will be taken, ▪ any monitoring programme should account for cumulative impacts ▪ any monitoring programme should be synergistic with the existing City Development Plan’s monitoring regime and compatible with the Environmental Monitoring (Table 7.1) of the revised NPF’s SEA Statement ▪ the need to screen any future amendments ▪ and post adoption, what should be summarised in the SEA Statement including - ▪ How environmental considerations have been integrated into the Variation; ▪ How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation; ▪ The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and, ▪ The measures decided upon to monitor the significant environmental effects of implementation of the Variation, along with the list of the Environmental Authorities to be consulted.
Office of Public Works – Flood Risk Management	The submission refers to flood risk management in National Planning Framework NPF First Revision National Policy Objective 78. The submission highlights that the OPW National Preliminary Flood Risk Assessment (PFRA) was reviewed in 2019 and again in 2025. It states that Section 3.0 ‘Flood Risk Information’ of the SFRA should be updated to include the National coastal Flood Hazard Mapping (NCFHM) as a data source. These maps are based on more up-to-date estimates of extreme coastal levels than those used for the CFRAM coastal maps and may be considered in preference with regards to the definition of Flood Zones. Future scenario mapping to be used for rezoning sites where available and consideration of flood risk in high end future scenario required; including justifications tests if required. A flood zone map is required for the north road site and the sequential approach to the zoning of the land required, as well as consideration of climate change. JT for Harold's Cross lands (H1) to provide guidance on residual risks and measures to manage flood risk. OPW seeking updated flood zone map for Fumbally Lane Lands and clarity on how the lands to manage climate change. Recommendation to be transposed as an objective into the Development Plan The submission seeks that links to flood related websites be updated.
Uisce Éireann	Uisce Éireann has no objection to the proposed Variation No. 11 to the Dublin City Development Plan 2022 – 2028. It states that implementation of all of the

Statutory/Prescribed Body	Summary of Response
	proposed rezoning will require various network upgrades and storm water separation and integrated surface water management will be essential. It points out that the medium and long-term growth of the Greater Dublin area is dependent on the delivery of the Water Supply Project and the Greater Dublin Drainage Scheme. For SDRA 3, 5, 6, 7, 8 and 10 separation of combined systems (foul and surface water) are required. Notably, the GDA water supply zone RAG status remains Amber. In some areas watermain upgrades and sewer and or pumping station upgrades may be required and where there is no UE project, these upgrades shall be developer funded. Sewer network upgrades and/or separation of foul and surface water systems required at Eastpoint Business Park(F1), East Wall Road (F2), North Road (A2), Finglas Business Park (A6), and Shanowen (B7).
Maritime Area Regulatory Authority (MARA)	MARA identifies that lands at East Point Business Park and East Wall Road Dublin 3 (Map Ref: F1 and F2 respectively) are located below the High Water Mark. Owing to this location, MARA advises that any planning application located within the maritime area may require a Maritime Area Consent (MAC) prior to the submission of any planning application, in the event that the maritime area is not privately owned.
Electricity Supply Board	The ESB emphasises the critical importance of electricity transmission and distribution infrastructure in supporting housing delivery, economic activity and national climate objectives. It notes that electricity demand has increased significantly, with each new dwelling requiring substantially greater electrical capacity than those constructed prior to 2019. The ESB outlines extensive current and planned investment programmes across transmission, medium-voltage and low-voltage networks to meet these demands. The principal issue raised relates to the ESB lands at East Wall Road, specifically Key Opportunity Sites Nos. 19 and 20. The ESB advises that these lands contain a long-established and operational 38kV substation and an adjoining strategically safeguarded site for a future 220kV/110kV transmission station, both of which are of critical regional and city-wide importance. The ESB strongly objects to: ▪ The inclusion of the operational 38kV East Wall Road substation within Opportunity Site No. 20 and the associated SDRA boundary; and ▪ Any implication that these lands are surplus or suitable for rezoning or redevelopment for non-infrastructure uses. The ESB requests that: ▪ The existing 38kV substation site be explicitly excluded from the SDRA and Opportunity Site mapping; ▪ ESB lands at East Wall Road be clearly safeguarded for the future delivery of high-voltage transmission infrastructure; and ▪ Policy objectives for Opportunity Site No. 19 be strengthened to explicitly recognise and protect existing and future ESB electricity infrastructure.

Statutory/Prescribed Body	Summary of Response
	More generally, the ESB seeks continued and enhanced coordination with Dublin City Council on land-use zoning, site identification and early-stage design of public infrastructure projects, and requests that public utility development remain permissible across zoning objectives to ensure timely delivery of essential infrastructure.
Fingal County Council	A submission was received from Fingal County Council which acknowledged the proposed variation and accompanying environmental reports. Having reviewed the proposed variation, Fingal County Council has no comments to make.

2.2.3 Adoption of Variation No.11

Pursuant to Section 58 of the Planning and Development Act 2024, as amended, the Members of Dublin City Council resolved to adopt Variation No. 11 of the Dublin City Development Plan 2022-2028 at a Special City Council meeting on 22 June 2026.

The variation as adopted, included one further minor amendment, which screened out for the requirement for Appropriate Assessment and/or Strategic Environmental Assessment.

Variation No. 11 of the Dublin City Development Plan 2022-2028 is effective as of the 22 June 2026.

3 SEA Environmental Report

The SEA Environmental Report has been prepared to comply with the provisions of Article 8 of S.I. 456 of 2025 European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025.

Article 5(1) and Annex I of the *SEA Directive* provides detail on the information to be included in an Environmental Report. **Table 3.1** provides a checklist of the information referred to in Article 5(1) with a confirmation of where the relevant information is contained within the SEA Environmental Report. (Refer to the standalone SEA Environmental Report prepared for the Variation).

Table 3.1 Information required under Annex I of the SEA Directive

Information referred to in Article 5(1)	Environmental Report Section
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Section 2 & Section 4
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5
(c) the environmental characteristics of areas likely to be significantly affected;	Section 5
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 5
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 6
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 8 and Appendix 1
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 7
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 10
(j) a non-technical summary of the information provided under the above headings.	Refer to Non-technical Summary Report

3.1 Strategic Environmental Objectives

The SEA Directive requires that *‘the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.’*

A series of Strategic Environmental Objectives (SEOs) have been prepared based on the SEOs in the Environmental Report for the existing Development Plan revised in line with current guidance for Variation No.11 (refer to **Table 3.2**). The SEOs provide a basis for the assessment of the environmental effects of the Variation No.11 and are framed in such a manner as to enable the Variation No.11 to be fully assessed in environmental terms.

SEOs are distinct from the objectives within the CDP, although they often overlap and are developed from international, national and regional policies which generally govern environmental protection objectives. These high-level SEOs are paired with specific targets which can be monitored using indicators (see Section 10 of this Report).

Table 3.2 Strategic Environmental Objectives (SEOs) for Variation No.11 to the DCC CDP 2022-2028

Theme	SEO
Biodiversity (Flora & Fauna) (B)	(B_1) Preserve, protect, maintain and where appropriate, restore the terrestrial, aquatic and soil biodiversity, of international, EU and nationally designated sites, protected species and habitats.
	(B_2) Ensure no adverse effects on the integrity of any European site, regarding its qualifying interests, associated conservation status, structure and function.
	(B_3) Maintain and where appropriate, enhance the biodiversity value of local designated and non-designated ecological and heritage areas, which function as stepping stones for migration, dispersal and genetic exchange of wild species.
	(B_4) Enhance biodiversity in line with the National Biodiversity Strategy and its targets.
Population & Human Health (PHH)	(PHH_1) Promote economic growth to encourage retention of working age population and funding of sustainable development and environmental protection.
	(PHH_2) Provide high quality residential, community, working and recreational environments with access to sustainable transport options.
	(PHH_3) Ensure that existing population and planned growth is linked with the required infrastructure and the services.
	(PHH_4) Protect human health and well-being from environment-related pressures.
Soils & Geology (SG)	(SG_1) Safeguard sensitive soil, resources and geological heritage sites against pollution and degradation.
	(SG_2) Promote the sustainable use of infill and brownfield sites over the use of greenfield within the city.
	(SG_3) Safeguard designated geological sites.
Water Quality (W)	(W_1) Protect and where necessary improve and maintain water quality and the management of watercourses and groundwater and coastal waters in compliance with the requirements of the Water Framework Directive and Marine Strategy Framework Directive objectives and measures.

Theme	SEO
	(W_2) Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion.
	(W_3) Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals.
Air Quality & Noise (AN)	(AN_1) To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from all sectors with particular reference to emissions from transport, residential heating and industry.
	(AN_2) Minimise travel related emissions and encourage a modal change from car to more sustainable forms of transport.
	(AN_3) Aim to meet Air Quality Directive standards for the protection of human health - Air Quality Directive.
	(AN_4) Significantly decrease noise emissions associated with traffic and transport and other noise related industry <i>etc.</i>
Climate Change (CC)	(CC_1) Minimise contribution to Climate Change by adopting mitigation and adaptation measures.
	(CC_2) Integrate sustainable design solutions into the city's infrastructure (e.g. energy efficient buildings; green infrastructure).
	(CC_3) Contribute towards the reduction of greenhouse gas emissions in line with national targets.
	(CC_4) Encourage and promote development resilient to the effects of climate change.
	(CC_5) Promote the use of renewable energy, energy efficient development and increased use of public transport.
Cultural Heritage (CH)	(CH_1) Protect places, features, buildings and landscapes of cultural, archaeological and / or architectural heritage from impact as a result of development
Landscape & Visual (LV)	(LV_1) Protect and maintain the special qualities of the landscape character of Dublin City, especially with regard to areas of high amenity - River Liffey, Royal Canal, Grand Canal and coastline.
Material Assets (MA)	(MA_1) Make best use of existing infrastructure, promote the sustainable development of new infrastructure to match population distribution and protect existing assets, to meet the needs of Dublin City's population.
	(MA_2) Promote the circular economy, reduce waste, and increase energy efficiencies.
	(MA_3) Ensure there is adequate sewerage and drainage infrastructure in place to support new development.
	(MA_4) A reduction in energy demand from the transport sector and support moves to electrification of road and rail transport modes.

4 Assessment of Effects of Variation No. 11

The Variation was subject to an assessment for potential effects arising from the implementation of the Plan on the baseline environment as characterised. The assessment was carried out having regard to the Strategic Environmental Objectives (SEOs) established for the aspects of the baseline environment which have potential to be impacted by the Variation.

The environmental assessment of the 'Strategic Objectives' of the Variation are set out separately in the Environmental Report. The provisions of Variation No.11 have been subject to environmental assessment as set out in the Environmental Report. Where potential for likely significant environmental effects arise these provisions have been identified for mitigation measures. It is noted that some provisions have screened in for Appropriate Assessment and these are discussed in further detail in the Natura Impact Report (NIR) which accompanies Variation. Likewise it is noted that the Strategic Flood Risk Assessment (SFRA) identified flood considerations on a number of lands (refer to Section 5.5 of the Environmental Report) and again these are referenced in the SRFA which accompanies the Variation.

Where potential negative or uncertain environment effects have been identified appropriate mitigation has been provided as set out in **Section 4.1** of this Report.

In working with the SEA process, the Variation acknowledges the requirement for any development to adhere to best practice in terms of environmental governance. Indeed, protection and enhancement of the environment is a critical pillar underpinning the core objectives and success of the Dublin City Development Plan 2022-2028 as varied. In this context any proposals for development arising from the Variation must meet the proper planning and sustainable development policies, objectives and development management provisions.

Following the consultation stage, a number of minor modifications were made to the Variation. The modifications are minor in nature and provide for clarification and do not give rise to any significant effects on the environment either by means of the Characteristics of the plan or the Characteristics of the effects and of the area likely to be affected. The minor modifications screened out for the requirement for Appropriate Assessment. Likewise, having regard to Schedule 2 of S.I. 456 of 2025 European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025, the minor modifications screened out for the requirement for Strategic Environmental Assessment.

One further minor modification was incorporated in the Variation prior to adoption. Again the minor modification screened out for the requirement for Appropriate Assessment and for Strategic Environmental Assessment. The SFRA was updated to include minor amendments made by Elected Members.

4.1 Mitigation Measures

The finding of the environmental assessment in the Environmental Report is that, if unmitigated, a number of the provisions of Variation No.11 have potential for uncertain or negative effects on aspects of the environment. These potential negative and / or uncertain effects, which derive from potential works resulting from the provisions of the Variation, focus primarily on biodiversity (including appropriate assessment), water (including flood risk), climate and landscape. This section of the Environmental Report identifies measures for the mitigation and avoidance of potential uncertain or negative environmental effects.

The majority of the mitigation measures are achieved through the detailed environmental protective policies and objectives as set out in the existing Dublin City Development Plan 2022-2028. The

Development Plan provides for sustainable planning and management control of all development in Dublin City – including any development or works deriving from the Variation.

The environmental protective policies and objectives of the Development Plan are detailed in Tables 9.1A and 9.1B of Appendix 9.1 of the SEA Environmental Report.

During the Variation-making process a number of potential environmental considerations were identified during the assessment process and specific mitigation measures were proposed and are included in the Draft Variation as follows:

In relation to the proposed amendment – inserting new text in relation to new Key Opportunity Sites 16-21 and the requirement for a masterplan – under Section 13.8 SDRA 6 – Docklands in Chapter 13 of the City Development Plan, the following text was proposed and is included as part of the required masterplan:

- **The Masterplan and development proposals in all areas must demonstrate compliance with:**
 - **The Climate Action Plan, a Climate Action Energy Statement with District Heating Enabled proposal and decarbonisation requirements;**
 - **Compliance with site specific flood risk assessment;**
 - **Screening for appropriate assessment and appropriate assessment, as required;**
 - **Screening for strategic environmental assessment / environmental impact assessment and preparation of an environmental report / environmental impact assessment report, as required;**
 - **Compliance with height and daylight/sunlight requirements;**
 - **Compliance with requirements for shift towards sustainable modes of transport and public transport and the preparation of sustainable mobility management plans.**

In addition to the above, the key environmental protective policies and objectives from the existing Dublin City Development Plan, which will ensure avoidance and mitigation of potential uncertain and / or negative environmental effects are set out in **Table 4.1** below and in Appendix 9.1 of the SEA Environmental Report.

Table 4.1 Mitigation Measures (i.e. Policies and Objectives from the Dublin City Development Plan 2022-2028) for Potential Negative and / or Uncertain Environmental Effects of Draft Variation No.11

(SEO Key: B – Biodiversity, PHH – Population & Human Health, SG – Land, Soils & Geology, W – Water Quality, AN – Air Quality & Noise, CC – Climate Change, MA – Material Assets, CH – Cultural Heritage, LV – Landscape &

Provision with Potential Negative Environmental Effects (refer to Table 8.1 of this Report)	Environment Factor / SEO	Selected Protective / Mitigation Measure
Dublin City Development Plan 2022-2028 Volume 1 Written Statement Chapter	Biodiversity (B_1, B_2, B_3, B_4)	Policy / Objective CA1 National Climate Action Policy CA2 Mitigation and Adaptation CA3 Climate Resilient Settlement Patterns, Urban Forms and Mobility

Provision with Potential Negative Environmental Effects (refer to Table 8.1 of this Report)	Environment Factor / SEO	Selected Protective / Mitigation Measure
13: Strategic Development and Regeneration Areas Amendment 2: SDRA 6 – Docklands Inserts new text relating to new Key Opportunity Sites 16-21 (<i>refer to text of Draft Variation for full detail</i>) And... Dublin City Development Plan 2022-2028 Volume 3 Zoning Maps (<i>refer to Appendix 8.1 of this report or text of Draft Variation for Maps also</i>). Amendment 1-7: Rezone Lands <i>Map Ref.:</i> F1 Lands at EastPoint F2 Lands at East Wall Road A2 Lands at North Road A6 Finglas Business Park B7 Shanowen Road Lands H1 Greenmount Ind. Estate E17 Lands at Fumbally Lane	Population and Human Health (PHH_1, PHH_2, PHH_3, PHH_4)	CA5 Climate Mitigation and Adaptation in Strategic Growth Areas CA8 Climate Mitigation Actions in the Built Environment CA9 Climate Adaptation Actions in the Built Environment CA21 Sustainable Energy Communities CA23 The Circular Economy CA24 Waste Management Plans for Construction & Demolition Projects CA29 Climate Action and Green Infrastructure CA30 Coastal Zone Management SC13 Green Infrastructure SC22 Historical Architectural Character QHSN2 National Guidelines QHSN13 Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 QHSN16 Accessible Built Environment QHSN17 Sustainable Neighbourhoods QHSN18 Needs of an Ageing Population QHSN22 Adaptable and Flexible Housing QHSN25 Housing for People with Disabilities QHSN26 Dublin City Council's Strategic Plan for Housing People with a Disability 2016 QHSN34 Social, Affordable Purchase and Cost Rental Housing QHSN50 Inclusive Social & Community Infrastructure CEE12 Transition to a Low Carbon, Climate Resilient City Economy SMT6 Mobility Management and Travel Planning SI2 Integrating Water Services with Development SI3 Separation of Foul and Surface Water Drainage Systems SI5 Safeguarding of Public Water Services Infrastructure SI6 Water Conservation SI7 Water Quality Status SI9 Groundwater Pollution SIO6 Groundwater Protection SIO9 Planning for Surface Water Management SI13 Minimising Flood Risk SI15 Site-Specific Flood Risk Assessment SI21 Managing Surface Water Flood Risk SI22 Sustainable Drainage Systems SI25 Surface Water Management SI27 Sustainable Waste Management SI33 Remediation of Contaminated Sites SI34 Management of Air Quality SIO21 Air Quality Data Collection SIO22 City Ambient Air Quality Monitoring Network SI35 Ambient Noise Quality SI36 Noise Management SIO23 Dublin Agglomeration Environmental Noise Action Plan SIO24 Noise Monitoring and Enforcement SI42 Light Pollution GI1 Green Infrastructure Assets GI6 New Development / New Growth Areas GI9 European Union Natura 2000 Sites GI10 Flora and Fauna Protected under National & European Legislation Located Outside Designated Areas GI12 National and International Sites for Nature Conservation
	Land, Soils and Geology (SG_1, SG_2, SG_3)	
	Water (W_1, W_2, W_3)	
	Air Quality & Noise (AN_1, AN_2, AN_3, AN_4)	
	Climate (CC_1, CC_2, CC_3, CC_4, CC_5)	
	Cultural Heritage (CH_1)	
	Landscape and Visual (LV_1)	
	Material Assets (MA_1, MA_2, MA_3, MA_4)	

Dublin City Development Plan 2022-2028: Variation No. 11

Strategic Environmental Assessment (SEA) Statement

Provision with Potential Negative Environmental Effects (refer to Table 8.1 of this Report)	Environment Factor / SEO	Selected Protective / Mitigation Measure
		GI14 Ecological / Wildlife Corridors GI16 Habitat Creation and New Development GI18 Minimise Impact – Light and Noise GIO8 Dublin City Biodiversity Action Plan 2021 - 2025 GIO12 Geological Sites GI19 Protect and Enhance Landscapes GI20 Views and Prospects GI22 Managed Access GI29 Protect Character of River Corridors GI31 Protect and Improve Ecological Status of Rivers under the EU Water Framework Directive GI35 General Protection of Coastal Zone GI37 Protection and Management of Dublin Bay GI38 Marine Pollution and MSF Directive GI41 Protect Existing Trees as Part of New Development GI49 Protection of Existing and Established Sport and Recreational Facilities GI51 Children's Playing Facilities – General BHA2 Development of Protected Structures BHA7 Architectural Conservation Areas BHA9 Conservation Areas BHA16 Industrial Heritage BHA23 Climate Action BHA26 Archaeological Heritage CUO46 Inclusivity CUO47 Accessibility SDRA01

The mitigation measures included with Variation No. 11, in combination with the development planning and control related environmental protection measures defined in the Dublin City Development Plan will prevent and mitigate any potential negative environmental effects due to the implementation of the Variation. No further mitigation measures are required.

5 Assessment of Alternatives

5.1 Introduction

Article 5(1) of the SEA Directive requires the Environmental Report to consider reasonable alternatives taking into account the objectives and geographical scope of the plan or programme and the significant environmental effects of the alternatives selected.

Alternatives put forward should be reasonable, realistic and capable of implementation. They should also be in line with the appropriate strategic level at which the plan will be implemented within the national planning hierarchy.

In April 2025 the National Planning Framework (NPF) First Revision was adopted to address evolving challenges in relation to climate change, housing, regional development and population growth. In July 2025 following the approval of the Revised NPF, the Department of Housing, Local Government and Heritage published the NPF Implementation: Housing Growth Requirements Guidelines in accordance with Section 28 of the Planning and Development Act 2000. The NPF Housing Growth Requirements Guidelines will replace the Housing Supply Target Methodology for Development Plan Guidelines for Planning Authorities, published in December 2020.

Local authorities are now required to update development plans to reflect on the national targets given by the Department. The NPF Housing Growth Requirement Guidelines requires sufficient zoning in Dublin City to meet the updated targets. The County Development Plan is mandated to be consistent with the National Planning Framework and the Regional Spatial and Economic Strategy. Accordingly, Draft Variation no. 11 is required to integrate the updated housing figures into the Core Strategy to ensure consistency with the planning hierarchy. Therefore, a 'do-nothing' scenario is not viable alternative.

As required by Section 3.0 of the NPF Housing Growth Requirements Guidelines, local authorities must initially assess the current adopted development plan and review the Core Strategy, related settlement strategies and zoning objectives against the objectives of the NPF Housing Growth Requirements Guidelines.

5.2 Option 1: Review of Z9 Amenity / Open Space Lands / Green Network

Consider the potential for additional housing capacity on lands currently zoned Z9: To preserve, provide and improve recreational amenity, open space and ecosystem services. The development plan indicates that the Z9 lands: are multi-functional, central to healthy place-making, provide amenity open space such as parks together with a range of ecosystem services such as improved biodiversity and ecological connectivity, nature-based surface water management, flood attenuation, river corridor restoration and climatic resilience.

The Z9 zoning objective does allow for a limited degree of residential development in specific and exceptional circumstances subject to criteria including that the development would be essential in order to ensure the long term retention, enhancement and consolidation of a sporting facility on the site.

5.3 Option 2: Z15 Community & Social Infrastructure

Consider the potential for additional housing capacity on lands currently zoned Z15: To protect and provide for community uses and social infrastructure. The development plan indicates that the Z15 lands: often consist of long established complexes of institutional/community buildings and associated open grounds, the existing uses on these lands generally include community, social or institutional development such as schools, colleges, sports grounds, residential institutions and healthcare institutions, such as hospitals. The Z15 lands are considered essential in order to provide adequate community and social infrastructure commensurate with the delivery of compact growth and the principle of the 15-minute city.

5.4 Option 3: Strategic Development and Regeneration Areas (SDRAs) & Z6/Z7

Strategic Development and Regeneration Areas (SDRAs) are a key element in the delivery of the core strategy and achieving compact and sustainable growth. These areas are capable of facilitating mixed use regeneration and supporting new homes, supporting community and social infrastructure and employment for the City. The Dublin City Development Plan 2022-2028 currently has 18 SDRAs.

Lands with the Z6 and Z7 zoning objective provide for employment uses. Land Use Zoning Objective Z6 is: 'To provide for the creation and protection of enterprise and facilitate opportunities for employment creation'. Land Use Zoning Objective Z7 is: 'To provide for the protection and creation of industrial uses, and facilitate opportunities for employment creation including Port Related Activities'.

Undertake a review and potential rezoning of lands in the existing Strategic Development Regeneration Areas (SDRA)'s as identified in the Dublin City Development Plan, and a review and potential rezoning of some employment / industrial (Z6/Z7) lands in the city as zoned in the City Development Plan.

5.5 Assessment of Alternatives

Three reasonable alternatives for the DCDP have been identified and assessed as set out in **Table 5.1**. The potential effects of the reasonable alternatives on the SEOs categorised as follows:

- Potential Positive Environmental Impact (indicated by '+')
- Potential Negative Environmental Impact (indicated by '-')
- Potential Positive and Negative Environmental Impacts (indicated by '+/-').
- Uncertain Environmental Impact ((indicated by '?').
- Neutral, No or Insignificant Environmental Impact (indicated by '0')

Table 5.1 Assessment of Alternatives for Variation No.5

Reasonable Alternative Description	SEO	Environmental Assessment	Environmental Evaluation
Option 1 Review of Zoning Objectives This option entails rezoning of existing amenity and open space lands.	B_1	-	Option 1 relates to the potential rezoning of existing amenity and open space lands. As such this option has the potential for significant negative construction-phase environmental effects, arising from loss of the amenity and open space to development of new
	B_2	-	
	B_3	-	
	B_4	-	
	PHH_1	+/-	
	PHH_2	+/-	
	PHH_3	+/-	

Reasonable Alternative Description	SEO	Environmental Assessment	Environmental Evaluation
	PHH_4	+/-	residential area on all environmental factors, including human health, biodiversity, including potentially on European sites, land and soils, water, including flooding, air quality, climate, heritage, landscape and material assets and the interaction between these factors. The overall assessment for Option 1: is Significant Negative during construction and operation.
	SG_1	-	
	SG_2	-	
	SG_3	0	
	W_1	-	
	W_2	-	
	W_3	0	
	AN_1	+/-	
	AN_2	+/-	
	AN_3	+	
	AN_4	-	
	CC_1	+/-	
	CC_2	+/-	
	CC_3	+/-	
	CC_4	+/-	
	CC_5	0	
	CH_1	+/-	
	LV_1	-	
	MA_1	+	
	MA_2	0	
	MA_3	+/-	
	MA_4	+/-	
Option 2 Z15 Community & Social Infrastructure This option consider the potential for additional housing capacity on lands currently zoned for community use and social infrastructure.	B_1	0	Option 2 relates to the potential rezoning of existing community and social infrastructure lands. As such this option has the potential for significant negative construction-phase environmental effects, arising from loss of the critical community and social facilities to development of new residential area on all human health, biodiversity, including potentially on European sites, land and soils, air quality, heritage and material assets and the interaction between these factors. The overall assessment for Option 2: is Significant Negative during construction and Moderate Negative during operation as new community and social facilities may be provided in any redevelopment.
	B_2	0	
	B_3	+/-	
	B_4	+/-	
	PHH_1	+/-	
	PHH_2	-	
	PHH_3	+/-	
	PHH_4	0	
	SG_1	+/-	
	SG_2	0	
	SG_3	+/-	
	W_1	+/-	
	W_2	+/-	
	W_3	0	
	AN_1	-	
	AN_2	+/-	
	AN_3	+	

Reasonable Alternative Description	SEO	Environmental Assessment	Environmental Evaluation
	AN_4	-	
	CC_1	+/-	
	CC_2	+/-	
	CC_3	+/-	
	CC_4	+/-	
	CC_5	+/-	
	CH_1	-	
	LV_1	0	
	MA_1	-	
	MA_2	0	
	MA_3	0	
	MA_4	+/-	
Option 3 Strategic Development and Regeneration Areas (SDRAs) & Z6/Z7 This option entails rezoning of existing SDRA, Z6 & Z7 largely developed and brownfield lands.	B_1	+/-	Option 3 relates to the potential rezoning of existing SDRA, Z6 & Z7 largely developed and brownfield lands. As such this option has the potential for significant negative construction-phase environmental effects, arising from redevelopment, including from demolition and reconstruction on water (W), air quality (AN), climate (CC), and waste (MA). The overall assessment for Option 3: is Moderate Negative during construction, Neutral / Positive during operation.
	B_2	+/-	
	B_3	+	
	B_4	+/-	
	PHH_1	+/-	
	PHH_2	+/-	
	PHH_3	+/-	
	PHH_4	+/-	
	SG_1	+/-	
	SG_2	+	
	SG_3	+	
	W_1	+/-	
	W_2	+	
	W_3	0	
	AN_1	+/-	
	AN_2	+/-	
	AN_3	+/-	
	AN_4	-	
	CC_1	+	
	CC_2	+/-	
	CC_3	+/-	
	CC_4	+/-	
	CC_5	+/-	
	CH_1	+	
	LV_1	0	
	MA_1	+	

Reasonable Alternative Description	SEO	Environmental Assessment	Environmental Evaluation
	MA_2	+	
	MA_3	+/-	
	MA_4	0	

5.6 Reasoning for Selection of the Preferred Alternative

Alternative 3 is selected as the preferred approach as it has the greatest potential to deliver the required residential units in a sustainable manner throughout the city, making best use of existing and planned infrastructure on existing developed or brownfield lands. This allows for selection of the most suitable lands with a balanced emphasis on environmental factors, minimising likely significant effects.

6 Monitoring

Monitoring of the Variation and its implications on the environment is important to ensure that the environment is not adversely affected through the implementation of the Plan. In accordance with Article 10 of the SEA Directive, monitoring must be carried out of the significant environmental effects directly related to the implementation of the Plan *“in order to, inter alia, identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.”*

However, as a Variation to the City Development Plan, once adopted, monitoring will be undertaken as part of the on-going monitoring and review of the Dublin City Development Plan 2022-2028.

Dublin City Council is responsible for monitoring and the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of corrective action.

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