

**Uimhir Thagarta Uathúil:** DCC-C38-DRAFT-2120

**Stádas:** Submitted

**Submission:** KIN Submission to DCDP 2022-2028

**Údar:** Kilmainham Inchicore Network

**Comhairliúchán:**

Draft Dublin City Development Plan 2022-2028

## Observations:

### Chapter 2: Core strategy

**Caibidil:** Chapter 2: Core strategy

1	2. Core Strategy	2.3.1 Capacity at SDRA Lands	<p><b>SDRA 9 Emmet Road</b></p> <p><i>"estimated capacity 1050 over 15 ha. ..."</i>(pg. 63)</p> <p>Query - given that the ERD is expected to have circa 500 units where are the other 550 units expected to be located?</p>
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### Chapter 8: Sustainable movement and transport

**Caibidil:** Chapter 8: Sustainable movement and transport

8: Sustainable Movement and transport	8.5.9 Street/Road, Bridge and Tunnel Infrastructure -	<p><b>Objective SMT023 Bridges (pg. 301)</b></p> <p>Suggested inclusion of (b) bridge over Camac linking OPW Kilmainham Gaol and Courthouse to Emmet Road and on to Richmond Barracks. This was proposed in an OPW commissioned <i>Kilmainham / Inchicore Connectivity Study</i> (by Blackwood Associates Architects, 2017).</p>
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8: Sustainable Movement and transport	8.5.9 Street/Road, Bridge and Tunnel Infrastructure -	<p><b>Objective SMT023 Bridges (pg. 301)</b></p> <p>Suggested inclusion of (a) bridge over Liffey at Donore Harriers/Liffey Vale Bio Diversity Centre</p>
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## Chapter 10: Green infrastructure and recreation

Caibidil: Chapter 10: Green infrastructure and recreation

<p>10: Green Infrastructure and Recreation</p>	<p>10.5.1 Policies and Objectives – <b>Green Infrastructure</b></p>	<p><b>Policy G13 Multi-functionality (pg. 358)</b></p> <p>KIN proposes that <i>'Promote active and passive recreation'</i> needs to include the term <i>team sports</i>, which conveys the amount of land needed for active TEAM sports. The terms active and passive recreation are too vague, and the size of 90m by 140m needs to be specified for active 'team sports' on 'community sports pitches'. A MUGA is not big enough to provide for the socially rich activity of organised team sports, which promote social bonds, passive surveillance and social cohesion.</p>
<p>10: Green Infrastructure and Recreation</p>	<p>10.5.1 Policies and Objectives – <b>Green Infrastructure</b></p>	<p><b>Policy G14 – Accessibility (pg. 358)</b></p> <p><i>"To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Park Strategy, access to facilities and to public parks and open spaces will be provided equal to all citizens and inequalities of access shall be identified and addressed."</i> (pg. 358)</p> <p>KIN believe that this Policy is too vague.</p> <p>The Disability Act 2005 requires that all public bodies provide EQUAL access to their services and publicly owned/managed property. Inequalities of access need to specify the legally defined groups of 10 protected grounds - as set out in the Equal Status Act 2014 and translated into public sector policy with the Public Sector Duty. 'All' is too vague a term, and NGO's/charities for LGBTQI, women, wheelchair users, Travellers, single parents etc. need to be consulted on design. One issue is clear stemmed trees, which may clash with ideas about bushes needed for biodiversity. Also Travellers and some other cultural groups may visit parks in large intergenerational family groups, wheelchair users needing parking, removal of kissing gates. Toilets are a key issue when spending time in green spaces for people with medical conditions, small children and some pregnant women. Toilet facilities need to be planned for as an equality issue. Further reference to more information on implementation of the Public Sector Duty which is a statutory duty of Dublin City Council. <a href="https://www.ihrec.ie/app/uploads/2019/03/IHREC_Public_Sector_Duty_Final_Eng_WEB.pdf">https://www.ihrec.ie/app/uploads/2019/03/IHREC_Public_Sector_Duty_Final_Eng_WEB.pdf</a></p>
<p>10: Green Infrastructure and Recreation</p>	<p>10.5.1 Policies and Objectives – <b>Green Infrastructure</b></p>	<p><b>Policy G16 - New Development/New Growth Areas (pg. 358)</b></p> <p><i>"To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contribute to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development"</i> (pg. 358)</p> <p>KIN believe that it is not clear what an "ecosystem services approach" is? Is this, for example, a bee/pollinator ecosystem designed for in planting in new developments? <i>Ecosystem services approach</i> seems a bit vague, which could mean it cannot be measured and then will not be implemented. Eco systems are legislated for in the EU Directive and the wording of the strategy document needs to be more precise in order to be implemented and clearly understood by operations managers. The wording of the strategy needs to use the terms from the Directive in order to precisely implement the Directive. A written checklist would help with precise implementation of the Directive in new developments.</p>

<p>10: Green Infrastructure and Recreation</p>	<p>10.5.2 Policies and Objectives - <b>Bio Diversity</b></p>	<p><b>Policies GI9 - GI18 and Objectives GI07 - GI014 (pg. 362-4)</b></p> <p>The statement in section 10.2 Achievements that <i>“Dublin City Council was one of the first local authorities in the Republic of Ireland to sign up to the ‘All Ireland Pollinator Plan’ (2015-2020), following on from initiatives over the previous ten years to create wild flower meadows. This has been supported by the gradual ‘wilding’ of parks, road verges and graveyards in order to provide habitat and food for insects and pollinators and through significant changes to planting schemes, which are now comprised of 80% of pollinator-friendly plants, changes in mowing cycles and the elimination of glyphosates from green space management. This work has been brought to the public’s attention through information campaigns and signage with the ‘Leave Them Bee’ tagline”</i> (pg. 349)</p> <p>It is the experience of members of KIN that this is not happening in some residential areas. KIN would like to see more information and support for private garden owners to make changes to improve biodiversity and create ecological corridors. Generally KIN would like to see the follow:</p> <ul style="list-style-type: none"> <li>* To prioritise the planting of native Irish tree, shrub and ground cover plant species in all public greening projects.</li> <li>* To implement a 1 per cent for biodiversity levy on all developments within the city</li> <li>*To work with social enterprises and involve communities in designing, planting and maintaining public green areas</li> <li>* To use a nature-based and wilding approach to green walls, prioritising native Irish ivy over non-native species</li> <li>* To set measurable targets on amount of hard surface opened up to be planted to ameliorate flooding, the heat island effect &amp; biodiversity loss</li> <li>* To set measurable targets on the increase in tree cover</li> <li>* To plan for succession problems with older trees by implementing no-mow policies around existing mature trees, where feasible, to allow them to seed new trees</li> <li>* To eliminate the use of peat compost in all DCC activities and its use by all suppliers to DCC</li> <li>* To fund community-based urban greening enterprises</li> </ul>
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<p>10: Green Infrastructure and Recreation</p>	<p>10.5.2 Policies and Objectives - <b>Bio Diversity</b></p>	<p><b>Policy G117 Habitat Restoration (pg. 363)</b></p> <p><i>"To increase the percentage of restored and naturalised areas on public land in the city That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-ter maintenance to limit degradation" (pg. 363).</i></p> <p>KIN suggest the following is added:</p> <p>* To encourage and fund community composting projects to regenerate degraded city soil</p> <p>* Growing space in residential developments, rooftops and temporarily on vacant land and initiatives such as the Eat the Streets (<a href="https://www.eatthestreets.ie/dublin">https://www.eatthestreets.ie/dublin</a>) will be fully supported.</p> <p>* To designate areas for urban food growing, using perennial plants and involving community groups, such as Foroige, in creating the food gardens/forests .</p>
<p>10: Green Infrastructure and Recreation</p>	<p>10.5.8 Policies and Objectives <b>Sport, Recreation and Play</b></p>	<p><b>Policy G148 – Multiple Use of Sports and Recreational Facilities. (pg. 382)</b></p> <p>Different sports teams/clubs will possibly be in competition with each other for space and resources. DCC need to show leadership on planning co-location of different clubs, further educational colleges, schools, possibly on the same community sports pitch. Consideration should be given by DCC to contract an independent management company to operate multi sport- community team sports pitches (of 90m by 140m/sports facilities) in order to manage the tension between different clubs/stakeholders using the space.</p>
<p>10: Green Infrastructure and Recreation</p>	<p>10.5.8 Policies and Objectives <b>Sport, Recreation and Play</b></p>	<p><b>Policy G149 - Protection of Existing and Established Sport and Recreational Facilities (pg. 382)</b></p> <p>KIN support this DCC Policy to protect existing and established sport and recreational facilities, including pitches... unless the loss would be replaced by equivalent or better provision in terms of quantity or quality in an accessible and suitable location.... the benefits of which would clearly outweigh the loss of the former." With regard to the Inchicore Sports Centre and the current pitch KIN would like assurance that the above policy is applied to future plans for the ERD.</p>
<p>10: Green Infrastructure and Recreation</p>	<p>10.5.8 Policies and Objectives <b>Sport, Recreation and Play</b></p>	<p><b>Policy G151 Children’s Play Facilities – General (pg. 383)</b></p> <p>KIN believe that this policy does not go far enough. Children have 54 legally protected rights in <i>The United Nations Convention on the Rights of the Child</i>, or <i>UNCRC</i>.</p>

10: Green Infrastructure and Recreation	10.5.8 Policies and Objectives <b>Sport, Recreation and Play</b>	<p><b>Policy GI52 Children’s Playing Facilities in New Residential Developments (pg. 383)</b></p> <p><i>To seek the provision of children’s playing facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety and accessibility and to create safe and accessible places for socialising and informal play. (pg. 383)</i></p> <p>KIN believes that there is incoherence between this policy and the SDRA guidelines that DO NOT specify play spaces for children up to 18 years of age. The culture of ‘no ball games’ in gated apartment buildings needs to end, and it be made clear that well designed play space for children up to 18 is not optional. It is compliance with the law. a development is only 1 and 2 bed apartments and studios, this is not a valid excuse to leave out children’s play spaces. SDRA guidelines must comply with the law that protect children’s right to play up to 18 years of age.</p>
10: Green Infrastructure and Recreation	10.5.8 Policies and Objectives <b>Sport, Recreation and Play</b>	<p><b>Objective GIO49 Play Friendly Communities (pg. 384)</b></p> <p><i>To support and encourage the development of play-friendly communities that provide time and space and permission for “everyday street play” opportunities and experience and play in urban public space (pg. 384)</i></p> <p>KIN believe that this objective does not go far enough. Children have a legally protected right to play in Article 31 of the UN Convention on Rights of the Child. The Dublin City Development Plan 2022 - 2028 must comply with the law on Children’s Rights. Objective should be to comply with and implement the law of the UN Convention on the Rights of the Child - specifically with regard to Article 31 not just to be play friendly.</p> <p>Article 31 states:</p> <ol style="list-style-type: none"> <li>1. Parties recognize the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.</li> <li>2. Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity.</li> </ol>

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**Chapter 11: Built heritage and archaeology**

**Caibidil:** Chapter 11: Built heritage and archaeology

11: Built Heritage and Archaeology	11.5.3 Built Heritage Assets of the City	<p><b>Policy BHA12 - Industrial, Military and Maritime, Canal Side and Rural Heritage</b></p> <p><i>To promote the awareness of Dublin’s industrial, military... Heritage (pg. 411)</i></p> <p>Given the level of industrial heritage within the Kilmainham and Inchicore Areas KIN supports this initiative. KIN would like to see particular reference to supporting the (a) restoration of the Camac River (b) restoration of Kilmainham Mill (c) a Transport Museum at CIE Inchicore (d) the repurposing of Kilmainham Garda Station, Old Kilmainham.</p>
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**Chapter 12: Culture**Caibidil: Chapter 12:  
Culture

12: Culture	12.5.2 Cultural Hubs and Quarters	Suggestion that another objective is added, similar to <b>Objective CUO14</b> but relates to exploring the opportunity for a re-purposed Kilmainham Garda Station as a shared resource for IMMA/RHK, Kilmainham Gaol and Kilmainham Mill which will support any future proposal that a museum/heritage facility be located there (pg. 443)
12: Culture	12.5.2 Cultural Hubs and Quarters	Suggestion that another objective is added, similar to <b>Objective CUO14</b> but relates to the addition of the Michael Scott designed Chassis Factory, Jamestown Road - supporting any future proposal that this space be repurposed (pg. 443)
12: Culture	12.5.3 Supporting Cultural Vibrancy in the City	<b>Policy CUO25 - Reuse of Vacant Space (pg. 448)</b>  <i>The City Arts Office in partnership with the Planning Dept. continue its role as broker between owners of unused premises encouraging the uptake of such spaces for artistic and cultural purposes for both short term and longer term use.(pg.448)</i>  KIN welcome this initiative and suggest such a use for Inchicore Library Building, Emmet Road.

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**Chapter 13: Strategic Development Regeneration Areas (SDRAs)**Caibidil: Chapter 13: Strategic Development Regeneration  
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13. SDRA 7 Heuston and Environs	13.9 SDRA 7 - Heuston and Environs	Add to <b>Movement Section</b> (pg. 527)-  "to facilitate the delivery of bridge from back of Kilmainham Gaol and Courthouse over the Camac River "
13. SDRA 7 Heuston and Environs	13.9 - Garda Station at Kilmainham	Add to <b>Land Use and Activity</b> -  "to recognise and provide the possibility of repurposing and regeneration of Kilmainham Garda Station as a shared resource for local cultural heritage landmarks" - this ties in with DCC Policy BHA12 (pg. 411) promoting industrial and military heritage.
13. SDRA 9 Emmet Road	13.11 SDRA 9 Emmet Road	Q: Land Use & Activity: What does "to facilitate the reconfiguration/ consolidation of educational uses in the Emmet Crescent Area" mean?

13. SDRA 9 Emmet Road	13.11 1 Goldenbridge Industrial Estate	"The Camac River is culverted for the majority of its journey through the site. The potential for its renaturalisation should be investigated further via a masterplan process in tandem with the river Camac restoration project. Refer to policy SI11 and SI12 for further details" consider replacing "Should be" with " will be" or "needs to be"
13. SDRA 9 Emmet Road	13.11.3 ERD Site	In relation to heights, the current design is adhering to the DCDP 2016-2022 that limits the height on the build to less than 24 metres. The proposed DCDP 2022-28 states: "the Emmet Road site is considered capable of delivering baseline height of 8 storeys with locally higher buildings in specified locations as detailed in the Guiding Principles Map, figure 13.9, subject to detailed design and compliance with Appendix 3 of the development plan" pg. 539. Can we get clarification on whether the application to ABP will be delayed until the DCDP 2022-2028 is ratified and therefore will allow for this suggested increased height/density? Or will it be the case that there will be an alternation to the design after the application goes to ABP when the DCDP 2022-2028 comes into place?
13. SDRA 9 Emmet Road	13.11.3. ERD Site	SDRA Guiding Principles from DCDP 2016-2022 are no longer included in new proposed DCDP. This is a concern given that in DCDP 2016-2022 it stated that "variety of housing tenure and unit types will be sought in order to achieve a balanced and sustainable community" this needs to be altered to reflect the cost rental aspect of the ERD and then this guiding principle needs to be reinstated in the DCDP 2022-2028. Secondly another guiding principle that has disappeared from the new DCDP is "Innovative proposals that create a landmark destination within the city for combined facilities of a community, recreational, leisure and sports nature will be promoted, such facilities shall integrate positively with the existing sports facilities on the site". This is another guiding principle that needs to remain in the new DCDP.
13. SDRA 9 Emmet Road	13.11.3. ERD Site	Request another guiding principle be added to the DCDP re the pepper potting (no segregation) of social and cost rental units within the ERD. This commitment has been stated by DCC. This is outlined as an assurance in Appendix 1, section 7.3, pg. 75 of the DCDP.

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## Chapter 1: Strategic context and vision

**Caibidil:** Chapter 1: Strategic context and vision

1. Strategy - Context Vision	Overarching strategic Approach	KIN agree with DCDP to develop a low carbon sustainable, climate resilient city and with chapter 3 climate action initiatives.
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## Chapter 2: Core strategy

**Caibidil:** Chapter 2: Core strategy

2. Core Strategy	2.7.1 Plan Making - Other local area plans/ village improvement plans (VIPs)	Welcome the VIP proposed for Kilmainham/ Inchicore. This is reiterating the KIDS report. VIP prioritisation based on 1. Area that require economic, physical and social renewal. 2. Development potential and ability to assist in the delivery of the Core Strategy. Need for regeneration within an area based on the Pobal Index of Deprivation.
2. Core Strategy	2.7.3 URDF Funding. Objective CSO13	KIN support the funding application for Kilmainham Inchicore Development Strategy (KIDS) implementation (planning, detailed design and construction) under call 3 of the URDF (This non statutory strategy was funded by URDF identifying potential projects including enhancement of K & I Villages, the Camac River Greenway and a Greening Strategy, as well as improving connectivity between K & I Villages, strengthen public realm and enhance the landscape character of the area which in turn will act as a catalyst for the urban regeneration of the area).

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## Chapter 4: Shape and structure of the city

**Caibidil:** Chapter 4: Shape and structure of the city

4: Shape and Structure of the City	4.5 Policy and Objectives for Inner City	KIN support the focus on encouraging more liveable inner city with balanced economic investment and increased focus on residential developments with significantly enhanced public realm.
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## Chapter 5: Quality housing and sustainable neighbourhoods

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5. Quality Housing & Sustainable Neighbourhoods	Figure 5	KIN support both Inchicore and Kilmainham designated as Key Neighbourhoods [Fig.5.1]
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## Chapter 7: The city centre, urban villages and retail

**Caibidil:** Chapter 7: The city centre, urban villages and re...

7: The City Urban Villages and Retail	7.4 Strategic Approach and 7.5 policies and objectives	KIN support strategic approach to promote and consolidate the role of urban villages, such as Inchicore and Kilmainham, so that they can provide convenient and attractive access by walking and cycling. That the importance of placemaking, in particular healthy placemaking and an attractive public realm in order to make them better places to live and to visit. (pg. 246/247). Policies CCUV20-26 relate to Inchicore as an identified "Urban Village" and a Village Improvement Plan (VIP) prepared for the village; this initiative is supported by KIN. Policy CCUV42 (pg265) outlines how public realm improvements and placemaking strategies will support the regeneration and revitalisation of the villages. KIN support such a measure and would like to see its implementation as soon as possible.
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**Attachments:**

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## Chapter 8: Sustainable movement and transport

**Caibidil:** Chapter 8: Sustainable movement and transport

8: Sustainable Movement and transport	8.5.4 Accessibility for All	KIN support the Urban Village policy SMT11 "Pedestrians and Public Realm" "to enhance the attractiveness and liveability of the city through continued reallocation of space to pedestrians and public realm to provide safe and comfortable street environment for pedestrians of all ages and abilities". (pg. 286) The implementation of such a policy in Inchicore Village would dramatically improve placemaking and sense of place in this village.
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## Chapter 9: Sustainable environmental infrastructure and flood risk

**Caibidil:** Chapter 9: Sustainable environmental infrastru...

9: Sustainable Environmental Infrastructure and Flood Risk	9.5 Policies and Objectives - River Corridor Restoration	KIN support the inclusion of a River Corridor Restoration strategy in line with WFD, RBMP and Climate change adaptation. In particular the inclusion of a set-back distance along the River Camac to safeguard the restoration integrity. Policies SI11 and SI12 (pg. 321) relate to developments along the river Camac and impact upon SDRA 7 and SDRA 9 relating to the opportunity for enhancing the Camac river corridor (both the ecological functioning and water quality) and aligns to principles of river restoration in the Kilmainham and Inchicore Area. The minimum set back distances outlined in this policy are supported by KIN.
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## Chapter 10: Green infrastructure and recreation

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10: Green Infrastructure	10.5.1 Policies and Objectives – Green Infrastructure	<p><b>Objective GIO2 Preparation of a Green Infrastructure Strategy for Dublin City:</b> <i>To prepare a Green Infrastructure Strategy for Dublin City that will include a newly developed set of green micro areas.</i></p> <p>KIN fully support the proposed Green Infrastructure Strategy for Dublin City that will include a newly developed set of green micro areas. We believe that there are great potential opportunities for micro greening initiatives in Dublin 8. We support D8 Green Bridge Forum and their proposals in regard to green micro areas between the Camac and Liffey that demonstrate the potential for local community contributions.</p>
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**Chapter 11: Built heritage and archaeology****Caibidil:** Chapter 11: Built heritage and archaeology

11: Built Heritage and Archaeology	11.5.2 Architectural Conservation Areas	KIN support the prioritisation of Ceannt Fort and CIE Estate Inchicore as areas for future designation of ACA. (pg. 401)
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**Chapter 12: Culture****Caibidil:** Chapter 12: Culture

12: Culture	12.5.2 Cultural Hubs and Quarters	KIN welcome that Kilmainham/Inchicore has been identified as a cultural quarter within Dublin City and that DCC will continue to support, develop, nurture and seek the creation of additional spaces where the opportunity arises. Policy CU7 and objectives CUO11-14 with regard to cultural clusters, Kilmainham Mill, Heritage Trail and Networks, Dublin 8 regeneration and Museum /Heritage Facility at Inchicore Works (CUO14) is welcomed (pg. 440-442).
12: Culture	12.5.3 Supporting Cultural Vibrancy in the City	Policy CU14 (pg. 447) and CUO30 (pg. 451) - Cultural Uses in Developments on Former Industrial Lands - KIN support this policy in particular in relation to Goldenbridge Industrial Estate and are glad to see a policy ensuring that any new development here must incorporate cultural uses as part of new mixed use communities and that at least one studio/rehearsal space or venue should be included.

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## Chapter 13: Strategic Development Regeneration Areas (SDRAs)

**Caibidil:** Chapter 13: Strategic Development Regeneration  
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13. SDRA 9 Emmet Road	13.11.4 Davitt Road East	KIN support the proposed upgrading and greening of the unused public space on the Canal at the end of Goldenbridge Terrace, pg. 540.
13. SDRA 9 Emmet Road	13.11 Figure 13-9	KIN support the proposed upgrading and expansion of the public space at Devoy Road near "the Pitch" as outlined in Figure 13-9: SDRA 9 - Emmet Road, pg. 541
13. SDRA 9 Emmet Road	13.11 Figure 13-9	KIN support the proposed / improved public space along the river Camac near the Grand Canal connection as outlined in Figure 13-9: SDRA 9 Emmet Road, pg. 541

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## Chapter 14: Land-use zoning

**Caibidil:** Chapter 14: Land-use  
zoning

14: Land Use Zoning	14.7.10 Zone Z10	KIN welcome the requirement of a Master Plan for the development of Goldenbridge Industrial Estate given the recent change of zoning for most of the Industrial Estate to Z10: To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses. (pg. 623)
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**Teorainneacha Gafa ar an léarscáil:** Níl