

Uimhir Thagarta Uathúil: DCC-C38-DRAFT-2120

Údar: Kilmainham Inchicore Network

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Comhairliúchán:

Draft Dublin City Development Plan 2022-2028

Chapter 10: Green infrastructure and recreation

Caibidil: Chapter 10: Green infrastructure and recreation

10: Green Infrastructure and Recreation	10.5.1 Policies and Objectives – Green Infrastructure	<p>Policy GI3 Multi-functionality (pg. 358)</p> <p>KIN proposes that ‘<i>Promote active and passive recreation</i>’ needs to include the term <u><i>team sports</i></u>, 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 promotes social bonds, passive surveillance and social cohesion.</p>
10: Green Infrastructure and Recreation	10.5.1 Policies and Objectives – Green Infrastructure	<p>Policy GI4 – Accessibility (pg. 358)</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 Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.” (pg. 358)</i></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.</p> <p>https://www.ihrec.ie/app/uploads/2019/03/IHREC_Public_Sector_Duty_Final_Eng_WEB.pdf</p>

10: Green Infrastructure and Recreation	10.5.1 Policies and Objectives – Green Infrastructure	<p>Policy G16 - New Development/New Growth Areas (pg. 358)</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” (pg. 358)</i></p> <p>KIN believe that it is not clear what an “<i>ecosystem services approach</i>” 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>
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<p>10: Green Infrastructure and Recreation</p>	<p>10.5.2 Policies and Objectives - Bio Diversity</p>	<p>Policies GI9 - GI18 and Objectives GI07 - GI014 (pg. 362-4)</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"> * To prioritise the planting of native Irish tree, shrub and ground cover plant species in all public greening projects. * To implement a 1 per cent for biodiversity levy on all developments within the city *To work with social enterprises and involve communities in designing, planting and maintaining public green areas * To use a nature-based and wilding approach to green walls, prioritising native Irish ivy over non-native species * To set measurable targets on amount of hard surface opened up to be planted to ameliorate flooding, the heat island effect & biodiversity loss * To set measurable targets on the increase in tree cover * 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 * To eliminate the use of peat compost in all DCC activities and its use by all suppliers to DCC * To fund community-based urban greening enterprises
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10: Green Infrastructure and Recreation	10.5.2 Policies and Objectives - Bio Diversity	<p>Policy GI17 Habitat Restoration (pg. 363)</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-term maintenance to limit degradation" (pg. 363).</i></p> <p>KIN suggest the following is added:</p> <ul style="list-style-type: none"> * To encourage and fund community composting projects to regenerate degraded city soil * Growing space in residential developments, rooftops and temporarily on vacant land and initiatives such as the Eat the Streets (https://www.eatthestreets.ie/dublin) will be fully supported. * To designate areas for urban food growing, using perennial plants and involving community groups, such as Foroige, in creating the food gardens/forests .
10: Green Infrastructure and Recreation	10.5.8 Policies and Objectives Sport, Recreation and Play	<p>Policy GI48 – Multiple Use of Sports and Recreational Facilities. (pg. 382)</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>
10: Green Infrastructure and Recreation	10.5.8 Policies and Objectives Sport, Recreation and Play	<p>Policy GI49 - Protection of Existing and Established Sport and Recreational Facilities. (pg. 382)</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>
10: Green Infrastructure and Recreation	10.5.8 Policies and Objectives Sport, Recreation and Play	<p>Policy GI51 Children's Play Facilities – General (pg. 383)</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 Sport, Recreation and Play	<p>Policy GI52 Children's Playing Facilities in New Residential Developments (pg. 383)</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. If 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 protects children's right to play up to 18 years of age.</p>
10: Green Infrastructure and Recreation	10.5.8 Policies and Objectives Sport, Recreation and Play	<p>Objective GIO49 Play Friendly Communities (pg. 384)</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 experiences 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"> 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. 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.

Attachments:

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