

Uimhir Thagarta Uathúil: DCC-C38-DRAFT-2122 Stádas: Submitted Submission: Give Us The Night feedback on Culture

**Comhairliúchán:** Draft Dublin City Development Plan 2022-2028

# **Observations:**

# **Chapter 12: Culture**

**Caibidil:** Chapter 12: Culture

Give us the Night

We would like to make some initial observations in relation to the draft Development Plan, and below that we have highlighted and queried elements of this draft plan that we believe need more clarity.

There is still ambiguity around what constitutes a cultural space, and while the UNESCO definition of culture is a useful reference, it is still unclear what types of cultural spaces the council will endeavour to provide, and how existing cultural spaces will be protected.

There is also a focus on cultural quarters and hubs but very little detail about what constitutes a cultural quarter or hub. It is fair to say that both concepts are still works in progress in Dublin, and the draft plan still lacks detail of how these areas will develop in the coming six years. With the exception of Temple Bar, there also is an apparent shortage of independent or community based spaces within the cultural quarters mentioned.

Dublin it appears, still prefers to showcase itself as a museum of our cultural past, rather than one that positions contemporary artists and communities at the centre. Modern multi-use creative spaces and inclusive cultural facilities must be at the heart of Dublin's future, and we hope that Dublin City Council will start to believe in and provide the types of spaces that emerging artists and communities can exist and develop in.

Dublin still relies heavily on private investment in order to provide cultural infrastructure, which appears to be one of the key challenges moving forward. We hope that some of our queries and thoughts below can help to provide achievable solutions to some of the overall challenges that are faced in the city.

Údar: Give Us The Night

### CU03 Dublin Music Resource Centre and Museum

In recognising the significant musical tradition in Dublin, the City Council will undertake a study to explore the opportunity of creating a Dublin Music Resource Centre and Museum that can provide facilities and opportunities for engagement with music for all, with particular focus on engaging and encouraging under represented and socially excluded people within the city.

"undertake a study to explore the opportunity".

Could Dublin City Council simply declare its intention to create this resource centre and museum? Have any locations or any area in the city been identified? Is there a timeline for when this might be completed?

# **CUO5 Cultural Forum**

To explore the possibility of establishing a Cultural Forum for Dublin, led by Dublin City Council and working with other cultural partners.

"explore the possibility".

Can Dublin City Council simply establish a Cultural Forum?

Also, what would the function of a Cultural Forum be (distinct from the Arts SPC or ACAG)?

# **CUO6 Arts and Culture Infrastructure**

To work with the Arts office in developing an Arts and Culture Infrastructure policy document for the city that informs the preparation of audits, use of vacant spaces and toolkits for provision of cultural and arts facilities.

What is the timeframe of delivery for this policy document?

Will Dublin City Council employ a project manager to oversee the application of meanwhile use and the creative development of vacant spaces? This would enable the council, property owners and tenants to streamline the process.

To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.

Can Dublin City Council identify which cultural clusters are earmarked for night-time and late-night use?

#### **CUO11 Cultural Spaces in Dublin 8**

To deliver a number of new cultural spaces and artists workspaces in the Dublin 8 area, including the renovation of Kilmainham Mills and the establishment of the Creative Campus space.

Is there a list of where all of these spaces will be, and a timeline for when these projects will be completed? "Cultural Spaces" is also vague, and doesn't give much indication of what will be delivered.

#### **CUO13 Dublin 8 Regeneration**

To ensure that the wider regeneration of Dublin 8 contributes to the cultural assets of the community with new spaces provided at street level in larger regeneration projects that will accommodate and provide for new local cultural uses.

Will this regeneration include any cultural venues, on a par with the Tivoli Theatre?

#### **CU11 Cultural Facilities within Docklands**

Support and encourage the growth of cultural facilities within Docklands, at community and citywide scale, to enrich the area, generate activity and economic benefits and celebrate the maritime heritage of the Docklands area.

Culture in Dublin's Docklands is centred around event tourism and offices. This huge area of recently developed land is lacking cultural vibrancy and is missing embedded social amenities for local residents and workers. Outside of two large commercial venues, Dublin's Docklands has no independent venue or community space of note. This should be referenced and factored into future plans for the area. As stated in CU14, the council "will ensure new developments on former industrial lands incorporate cultural uses as part of new mixed use communities". Dublin Port and Poolbeg offer opportunities to be truly ambitious with this policy. In other European countries, postindustrial areas such as these (on the fringe of cities) are used for a range of cultural, entertainment and night-time uses. Given the policy of the Government, Dublin City Council and An Bord Pleanála to remove cultural spaces and venues out of the city centre in favour of hotels, offices and build-to-rent accommodation, there now needs to be newly designated areas for culture to exist, including spaces and venues that provide loud, amplified music.

Another option available is to create cultural venues on boats in the Docklands area.

We believe that the Development Plan would benefit from being more detailed in its cultural vision, and that this should especially be reflected in the finalised plan for the Docklands given the unique potential within the area.

# **CU12 Cultural Spaces and Facilities**

To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments to meet the needs of an increased population within the city.

For a range of spaces and facilities to grow within these developments, it would appear that the provision of subterranean and rooftop spaces needs to increase. It is still not clear to what extent developers will be required to include cultural facilities and amenities, as discussed in our previous 'Cultural Clause' proposal, and what particular types of spaces Dublin City Council believes meets the needs of an increased population. Some more detail on each of these points would be helpful.

### **CU13 Protection of Cultural Uses**

To protect cultural uses within the city that have been negatively impacted by the Covid pandemic and seek to preserve such spaces so they are not lost to the city as a result of the economic impact of the extended closure during the pandemic.

In what way will Dublin City Council protect? Does this refer to financial assistance like rates waivers, or is this to protect the use of spaces for culture, irrespective of who the proprietor is?

Can the council give an example of the type of spaces it means?

### CU14 Cultural Uses in Developments on Former Industrial Lands

To ensure new developments on former industrial lands incorporate cultural uses as part of new mixed use communities.

Dublin City Council should also encourage the building or redeveloping of spaces as venues on under-utilised industrial lands as soon as possible. With this in mind, and the requirement of appropriate zoning, will the council develop a proactive policy in this regard to support new venue projects in the near future?

### **CU16 Temporary Use for Cultural Provision**

To facilitate the temporary use of underused sites or buildings for artistic or cultural provision.

Will this facilitation by Dublin City Council include a swifter and less bureaucratic process to gain use of such sites or buildings? Also, can Dublin City Council confirm if this policy may apply to derelict buildings in their possession?

### **CU17 Design of Cultural and Arts Facilities**

To promote a co-design approach to cultural and arts facilities and that applicants and developers consider the Toolkit guide for artform specific workplace to inform the design of such spaces.

This appears to refer to a multi-use space approach, of which there are many examples internationally. In the current climate of sustainable development, this approach is very welcome.

### **CUO22 SDRAs and large Scale Developments**

All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide for 5% community, arts and culture and artist workspaces internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.

What is the reasoning behind 5% inclusion of community, arts and culture and artist workspaces specifically for developments above 10,000 sq. metres? Should this not apply to smaller scale developments (under 10,000 sq. metres) too?

### CUO23 Demolition or Replacement of a Use of Cultural Value

Where applications are made seeking to demolish or replace a cultural space/use, the development must reaccommodate the same or increased volume of space/use or a similar use within the redevelopment. Cultural uses include theatres, cinemas, artist studios, performance spaces, music venues, nightclubs, We warmly welcome this policy which supports our proposal for 'Cultural Clause' and 'Footprint' policies in Dublin.

#### CUO24 Toolkit Guide to Workspace

The Council will publish a "toolkit" for developers and other stakeholders giving a guide to the spatial requirements of artform specific workspaces to inform the design process and ensure viable arts and cultural spaces are provided.

When will this toolkit be published? Will developers be obligated to use it?

#### **CUO28 Artist Live-work Space**

To support the development of a feasibility model and pilot project for provision of artist live-work space during the lifetime of the Development Plan and to seek to provide a clear community benefit as part of the project.

This concept could provide the anchor for a cultural quarter or centre, on a par with the Irish Cultural Centre in Paris. Can more certainty be provided on this initiative, and to target it for during the first half of the lifetime of the Development Plan rather than the entire lifetime?

#### **CUO30 Industrial Estate Regeneration Areas**

All large scale mixed use former industrial estate regeneration areas (over 10 ha) in the city shall include at least one studio/rehearsal space and/or venue.

Culture should be able to co-exist in industrial estates, which is why we don't believe that this policy should be reserved exclusively for former industrial estates. We hope this can be addressed in the Development Plan.

Furthermore we see an issue in equating one studio or rehearsal space with one venue. Clearly a venue would be much larger in scale, and therefore unlikely to be provided by a developer. Requiring a developer to provide just one studio or rehearsal space in an area over 10 hectares, is not a strong enough cultural commitment for local communities. The council should be committed to communal facilities and venues, rather than a singular unit that could in theory only get used by one person. At the very least, a number of studio or rehearsal spaces should be provided. We must also ask why a limit has been set at 10 hectares or over, and if this figure can be significantly reduced.

### **CUO31 Music Venues**

To encourage the development of new music venues that will provide opportunities for music artists to perform at a range of venue sizes.

Dublin City Council suggests that it will "support and encourage the development of a new music venue (400-1,000 scale) within the inner city to support and diversify the sector".

Does this mean that the council will provide funding and/or a site for this venue?

When does the council propose that this venue will be developed and have any potential sites been identified?

# **CU22 Range of Cultural and Amenity Options**

To seek and encourage a range of cultural and amenity options for residents and visitors within the city that are independent of licenced premises to allow options for younger people and others to engage and enjoy a range of activities in the city during evening hours.

We welcome this inclusion, but are unsure as to why activities would be limited to just evening hours. Dublin City Council should aspire to provide culture and amenity options all hours of the day, and unlicensed venues that will cater to this demand. We hope that the council can give this topic more thought and consideration, and broaden its policies in relation to access to cultural amenities.

# **CU23 Performance and Entertainment Spaces**

To protect and support Dublin city's cultural assets by facilitating the enhancement and/or growth of existing cultural spaces, including performance and entertainment spaces, while protecting the existing amenities of an area.

Can Dublin City Council describe how it intends to protect and support?

If the council is serious about protecting cultural use then it should protect the use of cultural buildings across the city.

As a building and business operating within an Architectural Conservation Area (ACA), Bewley's on Grafton Street has had its use as a café protected. This demonstrates a potential tool available to cultural spaces within the city, that may also have their cultural use protected. We believe that this tool should be available to spaces outside of ACAs too, and that the status of such spaces will be the subject of ongoing review by Dublin City Council.

As a starting point, we propose a number of spaces that contribute significantly to the special and unique character of the city, which should have their use protected:

Savoy Cinema (protect use as a cinema) The Button Factory (protect use as a music venue) The Sugar Club (protect use as a cinema/music venue) The George (protect use as a nightclub) The Cobblestone (protect use as a live music venue)

# CUO34 Noise Impacts

All applications for short or longer term residential proposals (including hotels) that seek permission adjacent to established late night uses such as nightclubs/music venues/public houses/comedy clubs, shall be required to demonstrate in their application, how, firstly through the use of good design and layout; and secondly, through increased sound insulation; they have ensured their development will not cause negative impacts on the adjoining uses in the future.

This describes the Agent of Change principle, which we fully welcome. Can the council agree to officially adopt Agent of Change in its planning policy?

Dublin City Council could also create an updated framework where noise limit levels are set to reflect a vibrant night-time economy, with regular monitoring of levels carried out and a mediation service to resolve disputes.

# **CUO35 Purpose Spaces for Evening and Night Time Activities**

To encourage the opportunity presented by new larger developments within the city to provide high quality, designed for purpose spaces that can accommodate evening and night time activities, such as basement/roof level "black box" spaces that can be used for smaller scale performances/theatre/dance venues, and for flexibility in the design of larger spaces, such as conference spaces, to be adaptable for evening uses.

We welcome this initiative, which supports our previous "Going Up Or Going Down?" proposal for basement and rooftop spaces within hotel developments. Will this be a mandatory requirement for developers? How does the council plan to "encourage the opportunity"?

### **CUO38 Music and Dance**

To recognise the cultural value of a thriving club and dance scene for all music types and audiences to the City and to the night time economy; and to support and protect existing club venues and the future growth and development of such facilities as a distinct part of the cultural life of the City.

We welcome Dublin City Council's recognition of the cultural value of Dublin's club and dance scene. In reality, Dublin has not had a thriving club and dance scene in over 15 years. This emphasises our previous point to maximise the potential for venues in areas like Poolbeg, Dublin Port and on industrial land, as well as of course the city centre and suburbs.

There is no commitment from Dublin City Council to provide any of its spaces for dancing at night. Will the council commit at least one flagship venue/space each side of the city centre for dance events?

### **CUO39 Canvas Spaces**

To pilot "canvas" spaces to support street art at agreed locations (including construction hoarding) and to establish legal walls in the city in support of developing street art through free painting and to look to establish pilot "canvas" spaces for a rotating programme of street art through free painting that can bring high quality installations to be seen by many in the city and add to Dublin's attractiveness.

We welcome this pilot and hope it can lead to more permanent arrangements around the city. We also suggest that independent promoters and organisers are facilitated through a number of selected walls and locations in the city, to display event posters and advertisements. Given the flyer ban that's in place in Dublin and the lack of walk-in shops or spaces that will display printed promotion materials, designated locations to advertise cultural events would be appreciated.

### **CU29 Public Realm for Cultural Events**

To encourage greater use of the public realm for cultural events to make the city centre more attractive to those with young families, and to seek provision of new public spaces for outdoor performance that are designed and fitted to host a range of events.

Can Dublin City Council identify particular spaces that it intends to encourage greater use in, and does the council include parks (that may include bandstands), squares and the increased pedestrianisation of streets within this plan for increased activity?

#### Attachments:

DCC-C38-DRAFT-2122-5420 - Give Us The Night - feedback to Dublin City Council Draft Development Plan.docx

Teorainneacha Gafa ar an léarscáil: Níl