



Uimhir Thagarta Uathúil: DCC-C38-DRAFT-2144  
Stádas: Submitted  
Submission: Submission to Draft City Development Plan

Údar: TU Dublin

Comhairliúchán:  
Draft Dublin City Development Plan 2022-2028

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## Observations:

### Chapter 3: Climate action

**Caibidil:** Chapter 3: Climate  
action

#### Climate Action

Climate adaptation is the issue of the day for the city, state and planet, yet it is much misunderstood by citizens. The changes that must take place are significant. They involve alterations to the physical environment as well as changes to individual and collective behaviour. Resistance to many of the policies that the government and the city are planning is likely to come from citizens, developers and diverse governance agencies. The discipline of Environment and Planning supports the emphasis that the draft development plan places upon climate adaptation.

We are of the belief that a very significant information campaign, citizen engagement and promotion of the climate adaptation policies needs to take place if the plans in the draft development plan are to be both successful and adopted by the majority of key actors in the city's development. These will only work if there is significant buy in by the city's population.

#### Attachments:

DCC-C38-DRAFT-2144-5484 - Dublin City Development Plan submission OR ML.docx

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### Chapter 5: Quality housing and sustainable neighbourhoods

**Caibidil:** Chapter 5: Quality housing and sustainable  
neighb...

#### Housing, Sustainable Neighbourhoods and Urban Villages

It is clear that the city has significant issues in meeting the housing needs of its citizens. The type, location and tenure of the housing stock that will be developed are going to be important in shaping the future of the city for generations to come. We welcome the change of emphasis in the draft development plan on housing.

The height of buildings used for accommodation is going to be important. We are of the opinion that people need to live as close to the street as practically possible and that they should be located in areas that are vibrant, where community facilities, public parks and public transport are accessible. The development of neighbourhoods

leading to vibrant and sustainable communities is essential. Presently, many areas in the city are disadvantaged with poor facilities and are economically unsustainable.

Addressing disadvantage and creating places and urban villages that can sustain these communities allowing them to develop economically and socially through regeneration, densification and giving them a focus and a place that is dynamic and identifiable is important for the whole city. Introducing community facilities for sport, community activity, the arts and night-time activities should be included in any future design for these areas.

**Attachments:**

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## Chapter 7: The city centre, urban villages and retail

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

### Retail

Retail is struggling. The city had been dominated by multinational high-street retailers. It is important that unique and diverse retail bodies are attracted to the city. Retail provision in urban villages and community locations need to be upgraded.

**Attachments:**

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## Chapter 4: Shape and structure of the city

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

### Height

Dublin is a relatively low-rise city. This draft development plan and earlier development plans have sought to address the issue of height in the city with considerable skill and imagination. A balance has been sought, but pressure is there to have excessively tall buildings, without any planning, design or environmental rationale.

It is incumbent upon this plan to control the height of buildings, ensure that design of buildings is attractive and that they fit into the ethos and culture of the city. The development plan needs to give encouragement to the creation and development of exciting new architecture and urban spaces throughout the city.

**Attachments:**

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## Chapter 8: Sustainable movement and transport

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

### Transport

The city council needs to be proactive in addressing transport policy as well as addressing transport blockages such as College Green, which is seriously problematic. The introduction of additional pedestrianisation and encouraging walking should be prioritised. Existing parking facilities should be considered for alternative uses.

The recently published “Five Cities Report” recommends a broad and integrated range of traffic demand management measures which, if implemented, can greatly enhance the mobility and liveability of our urban centres. These include, for example, 15 Minute Neighbourhoods, Parking & Traffic Management and Low Emission Zones. Experience elsewhere shows that this can enhance local economies while creating people-friendly places, increasing health and accessibility. Walking, for example, is one of our most neglected yet highly effective forms of transport.

**Attachments:**

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## **Chapter 10: Green infrastructure and recreation**

**Caibidil:** Chapter 10: Green infrastructure and recreation

### **Nature Conservation and Biodiversity Loss**

This plan must address nature conservation in the city in an urgent, comprehensive and meaningful way to ensure that biodiversity loss is halted and that we conserve and restore what remains of our natural habitats (as set out on p. 351). The present draft does not achieve this aim.

The plan must recognise what is of value: our natural (or semi-natural) habitats and the indigenous flora and fauna they support. Our most significant natural habitats — some of which are of international importance — must be afforded the highest level of protection to ensure that no further damage or loss occurs, either in terms of area or quality. In the case of Dublin City, these habitats occur along the coastline, including North Bull Island, as well as along the rivers and canals and in certain other long-established grassland, scrub and woodland communities, such as Phoenix Park.

These remnants of naturally occurring habitats have evolved in response to complex biotic and abiotic factors. They are highly specialised, of scientific interest, and of high nature conservation value. They consist of finely tuned habitats, which cannot be recreated if lost, and are rich in naturally occurring species of limited distribution elsewhere. There is a recognisable integrity to the communities of plants and animals they contain, and many rare species are included — species which are in decline and threatened with extinction in the greater Dublin region. They serve as reservoirs for indigenous genetic resources which have survived as fragments despite our anthropocentric actions. In addition to their biological value, their cultural value is equivalent to that of our most cherished architecture, archaeological sites, historical artifacts or works of art — they cannot be replaced.

The plan must contain an unambiguous statement making clear the significance of these natural heritage sites and must insist on all legal designations pertaining to these habitats being upheld. There is no longer room for complacency given the extent of loss that has already been suffered. Nature conservation measures must be implemented as a matter of urgency to ensure that there is no further loss or degradation of the habitats or their species.

In the present draft of the plan, these natural habitats are alluded to under the ill-defined terms 'biodiversity' and 'green infrastructure'. These terms, and the ways in which they are applied in the draft plan, fail to distinguish between our most significant sites for nature conservation, and other 'green' elements of the urban environment, such as amenity areas of relatively recent origin and other planted, engineered and largely artificial 'green' elements. Such horticultural interventions in the landscape are of relatively low importance for biodiversity, however welcome they may be for other reasons, such as aesthetic or recreational benefits. They are essentially forms of gardening which impose our designs on the landscape and encourage the proliferation of some common species — species which can survive in a broad range of habitats, and in habitats which are easily created. These species are therefore not at risk of being lost and they are largely irrelevant to our efforts in relation to tackling biodiversity loss.

These newly created habitats may in time acquire a complexity, species richness and scientific value comparable to existing naturally occurring sites, but this will take decades, centuries or longer. Many sites lack the complexity or fine tuning of abiotic features to become suitable for most rare species (which require rare conditions). But allowing for time and biotic factors, they nevertheless depend on there remaining a pool of the indigenous species on which to draw in the future. The remaining genetic pools must therefore be afforded every protection.

The failure to understand and acknowledge this highly significant distinction between natural habitats, at one end of the spectrum, and newly-created green spaces at the other, and instead to address all as 'biodiversity' and 'green infrastructure' on a seemingly equal footing, poses one of the most serious threats to our natural environment. Far from addressing biodiversity loss, this approach drives and expedites the problem of habitat degradation and loss of species.

Of serious concern is Section 10.5.6 which sets out the UNESCO Biosphere Reserve Status of Dublin Bay but fails to mention the legally binding EU Natura 2000 designations or other national designations. Public engagement, education, etc, under the UNESCO designation can only take place insofar as it is compatible with the Natura 2000 designations, especially regarding the Conservation Objectives. Our coastal habitats are already under extreme pressure from overuse. Adding further pressure, for example by increasing visitor numbers, may lead to the loss of what little remains of vulnerable populations of many species that are in decline nationally due to habitat loss.

Our most significant natural habitats must be afforded the highest protection as a matter of urgency and need to be described in this plan in language which demonstrates an understanding of their unique and complex scientific value. Amenity areas of minor value for biodiversity — however useful and welcome for other reasons — must not be confused with these dwindling and irreplaceable naturally occurring, ecologically sensitive sites which serve as reservoirs for the remnants of our native flora and fauna.

#### **Attachments:**

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## **Chapter 12: Culture**

**Caibidil:** Chapter 12:  
Culture

### **Culture and Night Life**

The city craves new performance centres. The social element of the city is relevant to all ages and all backgrounds. A city that has a diminished culture is a city that will wither away. We have lost a lot of venues over the last few decades.

If we wish to have a vibrant city, a dynamic night-time economy and strong diverse cultural activity is essential. It is what attracts visitors, creates a city that people want to visit and live in. We need to use much of the vacant buildings in the city centre that are suitable and look to develop some key vacant sites for cultural and music venues. Facilities for artists to work in, collaborate and engage in creative activity are necessary. Accommodation for artists at reasonable rates is important if we want our artists to be able to live in the city.

**Attachments:**

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**Teorainneacha Gafa ar an léarscáil: Níl**