

**Uimhir Thagarta Uathúil:** DCC-C43-MA-217

Stádas: Submitted

Submission: Cllr Alison Gilliland Submission

Comhairliúchán:

Material Alterations to Draft Dublin City Development Plan 2022-

2028

### **Observations:**

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

Caibidil: Chapter 1: Strategic context and

vision

Please select the Proposed Material Alteration on which you are

commenting::

Material Alteration No.

1 [

Údar: Alison Gilliland

I very much support the inclusion of this policy objective - we as a local authority have a responsibility to contribute proactively and deliberately to the realisation of the 17 SDGs

### **Chapter 5: Quality housing and sustainable neighbourhoods**

Caibidil: Chapter 5: Quality housing and sustainable

neighb...

commenting::

Please select the Proposed Material Alteration on which you are

Material Alteration No.

5.12

I very much support the new Objective - Autism Friendly or Neurodiversity Community Plans

Support and encourage the piloting of autism friendly or neurodiversity community plans in partnership with all key stakeholders.

### **Chapter 5: Quality housing and sustainable neighbourhoods**

Caibidil: Chapter 5: Quality housing and sustainable

neighb...

commenting::

Please select the Proposed Material Alteration on which you are

Material Alteration No.

5.18

I have some concerns with regard to this amendment:ie *Policy - Temporary Accommodation Located in the City Centre:* 

It is the Policy of Dublin City Council: To ensure a review of the existing provision of temporary/homeless accommodation in the City Centre, with a specific regard to Dublin 1, 7 and 9. The aim of which should be to reduce the overconcentration of services in those locations. There will also be a general presumption against the

development and expansion of any new temporary/homeless accommodation services within Dublin 1, 7 and 8, including adaptation of tourist hostels and hotels, in acknowledgement of the existing concentration of such uses.

While I recognise that there is an overconcentration of homeless/temporary accommodation in these areas we need to recognise the difficulty in sourcing accommodation suitable for homeless/temporary accommodation outside the city centre areas and that this policy may increase the number of homeless persons rough sleeping due to insufficient beds/temporary accommodation being made available. Perhaps an additional line indicating *that every effort will be made to provide more temporary/homeless accommodation in areas not currently prodving such services.* 

# **Chapter 5: Quality housing and sustainable neighbourhoods**

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

Please select the Proposed Material Alteration on which you are

Material Alteration No. 5.23

commenting::

I very much support the amendments detailed as follows, particularly the reference to the use of evidence based data in the Dublin City Council Housing Need and Demand Assessment, to ensure a sustainable housing **tenure** mix that meet the housing needs of the city.

It is recognised that Build to Rent (BTR) serves an important role in meeting housing demand and can fill a gap in tenure mix in established areas of owner-occupier housing. Recent emerging trends however, would indicate that the dominance of BTR in large schemes can be to the detriment of {standard designed apartment} (build to sell) units. Whilst such development has its place in the hierarchy of provision of homes across the city, the Planning Authority will seek to avoid over proliferation of such use in certain areas and encourage such development as part of a healthy mix of tenure in order to create sustainable communities and neighbourhoods.

BTR should be concentrated (in prime inner-city areas and also) in areas of high intensity employment use, (such as within 500 metres walking distance of a high employment area i.e. more than 500 employees per hectare,) within 500m of major public transport interchanges ((e.g. Connolly Station, Tara Street Station and Heuston Station)) and within identified Strategic Development Regeneration(s Zones) {Areas}. Furthermore, applications for BTR schemes should be required to demonstrate {how the development supports housing need, particularly with regard to tenure, unit size and accessibility with particular reference to the Dublin City Council Housing Need and Demand Assessment and} that there is not an over-concentration of Build to Rent Accommodation within an area, including a map showing all such facilities within {a 1km radius}((3km)) of a proposal. Such housing will be controlled in the interest of providing a mix of tenure and unit types. In assessing the matter of overconcentration, the Planning Authority will have regard to factors such as:

- the number and scale of other permitted BTR development in the vicinity {(within a 1km radius)}((3km)) of the site,
- the household tenure and housing type of existing housing stock in the approximate vicinity {(within a 1km radius)}((3km)) of the site,
- and the proximity of the proposal to high capacity urban public transport stops and interchange (such as DART, Luas and BusConnects).

I also support the stated *general presumption against large scale residential developments (in excess of 100 units)* which comprise of 100% BTR typology. However, I do **not** think that the requirement for a minimum of (40%) (60%) of standard build to sell apartments within BTR developments will ensure a sustainable mix of tenure and long term sustainable communities as, aside from the size differential allowed relating to BTR, the aim of the BTR is to provide rental opportunities for the first 15 years and therefore I would consider that this laudable size requirement would not necessarily equate with the units built to the standard build being sold to individuals/families but rather they would be rented and probably at a higher rent given their larger size.

Perhaps it would be more beneficial to require all large scale residential developments to explicitly indicate the tenure mix and that this tenure mix should reference the local housing tenure and typology needs and the Dublin City Council Housing Need and Demand Assessment.

I would also include a reference in this section indicating that the gap in rental supply detailed in the DHPLG circular issued in 2016 (https://www.opr.ie/wp-content/uploads/2019/08/2016-Build-To-Rent-Housing-Projects-1.pdf) has now been bridged and more balanced development that ensures standard build units for sale and social housing/affordable cost rental now need to be prioritised.

## **Chapter 5: Quality housing and sustainable neighbourhoods**

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

Please select the Proposed Material Alteration on which you are

5.24

Material Alteration No.

commenting::

See previous comments re Material alteration 5.23 and the amendment requiring 60% standard build within BTR developments.

### **Chapter 12: Culture**

Caibidil: Chapter 12: Culture

Please select the Proposed Material Alteration on which you are

Material Alteration no. 12.15

commenting::

Supporting my original motion leading to this amendment

Section 12.5.2 Cultural Hubs and Quarters, sub heading Temple Bar

Page: 444, insert New Objective after New Objective – Artistic Spaces, subsequent numbering to be amended accordingly

**Amendment:** 

**{Objective - LGBT+ Community** 

To build upon the strong connection between the Temple Bar Quarter and environs and the LGBT+ community and (i) seek to preserve and enhance key cultural spaces within the area that serve the community and (ii) undertake a feasibility study in relation to a new dedicated Museum and Cultural Centre dedicated to Irish Queer history and LGBT+ rights}.

### **Volume 3 - Zoning maps**

Caibidil: Volume 3 - Zoning

maps

Please select the Proposed Material Alteration on which you are

commenting::

Map Sheet B: Ref B-

0012

I **do not** support the re-zoning of the grass verge adjacent to DCU lands, Griffith Avenue Dublin 9 from Z9 to white lands. This re-zoning would disrupt the consistency of the Z9 zoning along Griffith Ave which is integral to protecting the tree lined character of this most historic avenue. It must also be preserved as a Z9 zoning to protect the environmental community activities - this verge, like all verges along the Ave, is used annually for leaf mulching. This activity also significantly contributes to the safety of pedestrians and cyclists using the Ave as local residents consistently collect the avalanche of fallen leaves that present a huge slip hazard on the footpaths and cycle lanes. Re-zoning this verge to white lands leaves this particular stretch of verge open to abuse and compromises its protection as an open green amenity.

**Documents Attached: Níl** 

Teorainneacha Gafa ar an léarscáil: Níl