

Development Plan Team,  
Planning & Property Development  
Department,  
Block 4 Floor 3,  
Civic Offices,  
Wood Quay,  
Dublin 8,  
D08 RF3F

31 August 2022

**Re: Submission in response to proposed material amendments to the Draft Dublin City Development Plan 2022-2028**

Dear Sir/Madam,

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Glenveagh Properties, in response to the proposed material alterations to the Draft Dublin City Development Plan 2022-2028 (hereinafter referred to as the 'Draft Plan'). This submission focusses on objectives in Chapter 12 of the Draft Plan that aim to grow the cultural infrastructure of the City.

The approach to Culture set out in Chapter 12 is broadly supported by our Client, including objectives which seek the preparation of a cultural infrastructure audit, Objective CU06 and CU040 refers.

The Draft Plan acknowledges that there are "*opportunities to expand and grow the range and quality of cultural and arts facilities within the community and no one solution fits all. It is proposed that the Arts Office and Culture and Recreation Section will work with the Planning Department to undertake a series of localised audits of Local Electoral Areas to identify the best local solution that will provide a plan for investment in local facilities- both public and private – that will address shortcomings in that area.*"

The proposed timeline for preparation of a cultural and artistic space audit by the City Council that would assess the current and future needs is stated as 'during the life of the development plan'. In the interests of proper planning and sustainable development and having regard to the anticipated rate of development that will take place to meet the housing needs of the City, it is recommended that this audit commence immediately and be completed within 6 months to inform the delivery of new cultural and artistic spaces during the plan period.

Separately, Objective CU022, places a requirement for individual development proposals that exceed 10,000 sq.m in total area to provide for 5% community, arts and culture internal floorspace as part of their development at the design stage.

Our Client recognises the importance of CUO22 to the provision of community, arts and culture spaces within large scale developments. However, requiring individual proposals to include 5% community, arts and cultural uses solely in the form of internal floorspace in advance of the City carrying out the necessary audits to identify and address specific shortcomings in local areas is counter to the stated aims of the Draft Plan. Crucially, it also disregards the important contribution that outdoor spaces and facilities can make to the creation of sustainable and vibrant communities.

In the wake of the Covid pandemic and its impact on the cultural and arts sectors, it is important that the provision of new community, arts and culture spaces is guided by an evidence-based approach that does not undermine the continued viability of the City's existing cultural assets. Increased delivery of flexible outdoor spaces has the potential to play a key role in facilitating the City's goal of expanding the range and quality of cultural and arts facilities within the community. It would allow for the provision of adaptable, innovative and future-proofed spaces that offer opportunities for a wide range of uses and activities.

In recognition of the above and so allow for the provision of flexible outdoor spaces that respond to the varying needs of diverse communities, the following minor amendment to CUO22 is respectfully requested:

#### **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 ~~internal~~ floorspace as part of their development. The option of relocating a portion (no more than half of this figure) of this to a site ~~immediately adjacent to the area~~ **within 1km (c. 15 minute walking catchment)** 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.

Note: Request in relation to the specific wording is indicated by **red text** and ~~strikethrough~~

The minor amendment requested to CUO22 in this submission is non-material and can therefore be incorporated at this stage of the plan-making process. The requested amendment would ensure that individual applications for large-scale developments above 10,000 sq.m can be progressed without representing a material contravention of the forthcoming City Development Plan. The consequence of not providing this flexibility would be far reaching and potentially devastating to the timely delivery of new homes.

We trust that our submission will be taken into account as part of the consultation process on the proposed material alterations to the Draft Plan. Finally, our Client wishes to commend all those involved in the preparation of this new development plan for the city and look forward to working with the Council to deliver it.

Yours sincerely



Martina Keenan Rivero

**McCutcheon Halley Chartered Planning Consultants**