

Development Plan Team,
Planning and Property Development Department,
Dublin City Council,
Wood Quay,
Dublin 8

Date: 1st September 2022
JSA Ref: 21024

Dear Sir / Madam,

RE: SUBMISSION ON THE PROPOSED MATERIAL AMENDMENTS TO DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022-2028 ON BEHALF ON CHQ DUBLIN LIMITED IN RESPECT OF THE CHQ BUILDING AND ST GEORGE'S DOCK

1. Introduction

- 1.1 On behalf of our client, CHQ Dublin Limited, we wish to make a submission in respect of the Proposed Amendments to the draft Dublin City Development Plan 2022-2028 published on 27th July 2022 in respect of The chq Building and George's Dock incorporated within the draft Plan.
- 1.2 We welcome the opportunity to make further submission to the draft Dublin City Development Plan 2022-2028 at this stage and wish to express the broad support of our client for the key themes and objectives set out in the draft Plan, and particularly in respect of the proposed cultural hub/quarter within the Docklands and the consolidation and enhancement of the city's waterways.
- 1.3 Following submission on the draft Plan, our seeks to comment and/or make amendments to the following proposed amendments:
- **Material Alteration Reference Number 10.11: Rivers and Canals**
 - **Material Alteration Reference Number 10.18: Sport, Recreation and Play**

2. Background

- 2.1 The draft Plan notes the significant investment in the tourism sector including EPIC The Irish Emigration Museum at CHQ and the role of Fáilte Ireland in the 'Docklands Visitor Experience Development' which our client has played an active role. The position and presence of The chq Building has grown exponentially in the last decade, welcoming a wide range of retail and food and drink operators, restaurants and bars and recreation, as well as the high-tech, start-up hub at Dogpatch Labs

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which has added positively to the vibrancy and vitality of CHQ. Dogpatch Labs won a £17m contract in 2020 to manage the National Digital Research Centre (NDRC) until 2025, supported by regional partners, indicating the strength and significance of the company's presence at CHQ.

- 2.2 The chq Building has increased occupancy from 20% in 2013 when the building was purchased from the Dublin Docklands Development Authority to being 80% let in 2019 with employment numbers increasing from 30 to 650 in the same time period. The building has welcomed 2.4 million visitors, with an additional 400,000 visiting restaurants and external events associated with the building. EPIC The Irish Emigration Museum welcomed 241,000 visitors in 2019, with a target of 750,000 annually, with the Jeanie Johnston Irish Famine Ship moored at CHQ received 36,000 visitors in 2019 with a target of 100,000 per annum. This indicates the existing strength of trade and interest at CHQ and the aspiration to enhance this further in future years assisted by appropriate improvements to the surrounding area in respect of public realm, streetscape and welcoming public spaces which can increase footfall and support local businesses.
- 2.3 The chq Building unique space has seen several high profile cultural and corporate events hosted at the venue, contributing to cultural life and night-time economy.

3. Proposed Amendments

- 3.1 CHQ Dublin Ltd. strongly welcome the promotion of Dublin's waterfront and waterways, including the adjacent George's Dock which has been subject to various proposals and design options in recent times. It is vital that the dock is brought back into productive use as a valuable community asset and a destination for the city centre.
- 3.2 In this respect, our client wishes to make specific submission on the following proposed material amendments:

Material Alteration Reference Number 10.11

Chapter 10
Section 10.5.5 Rivers and Canals
Page 374, Objective GIO34

Amendment:

Objective GIO34 Water Animation Strategy Docklands

To support the implementation of the North Lotts and Grand Canal Dock SDZ Docklands Water Animation Strategy 2018 to promote the Dublin Docklands as a significant water focussed amenity and the sustainable use of the waterways as an integral part of the vitality and experience of Dublin Docklands, that enhances the area as a world class destination for living, doing business, tourism, leisure and cultural activities; and to explore the possibility of a new cultural space as part of the development of Georges Dock Basin. The Council commits to liaise and work with the Docklands Oversight and Advisory Committee and other relevant bodies in relation to proposals in George's Dock.

Material Alteration Reference Number 10.18**Chapter 10****Section: 10.5.8 Sport, Recreation and Play****Page: 384, Objective GIO53****Amendment:****Objective GIO53 Water Sports and Leisure Activities**

To support the development of a public lido {at George's Dock, and to strive to achieve this within the first three years of the Development Plan being adopted,} and to provide other water sports and leisure activities in the city centre and {at the liffey, canals and other key water bodies}.

- 3.3 In respect of **Objective GIO34: Water Animation Strategy Docklands**, our client has previously made submission to the draft Plan in support of this objective. The proposed additional text is also welcomed by CHQ Dublin Ltd. A focus on cultural uses within the George's Dock area is aligned with the vision and objectives of CHQ Dublin Ltd and will assist in increased footfall and the area becoming established as true destination within the city for visitors and residents alike.
- 3.4 In respect of **Objective GIO53 Water Sports and Leisure Activities**, while our client supports the reactivation of George's Dock for cultural and recreational use, CHQ Dublin Ltd. has concerns in respect of the prescriptive reference to a lido at this location and would respectfully submit that the future use of George's Dock be subject to a public consultation as part of the planning process to ensure engagement with relevant stakeholders. This will assist in the implementation of the optimum use at the location which can complement the cultural component of The chq Building.
- 3.5 The reuse of this space could be utilised for public recreational use, park or green space and should be subject to appropriate public consultation and a public design competition on this matter.

Potential Alternative Uses

- 3.6 It is respectfully contended that there may be alternative, more suitable recreational uses for George's Dock. The dock is a central and highly visible part of Dublin city centre and it is important that a suitable use for the site is identified. The possible use of the dock as a lido as prescribed in the Material Alterations has the potential to be underutilised, seasonal and require substantial public funding for rates and / or taxpayers on an annual basis.
- 3.7 An alternative design suggestion, such as the Urban Scale Interventions idea for the reuse of George's Dock as a sunken garden, is shown below. This formed part of the CHQ Dublin Ltd. submission on the draft Plan. The option represents an accessible and cost-efficient alternative to the potential lido use now suggested in the material alterations.



Figure 1: Extract of Sunken Garden Idea (Source: Urban Scale Interventions)

- 3.8 The Urban Scale Interventions solution would seek to implement an area ‘*alive with soundscapes and seascapes*’ and as an ‘*inclusive sustainable space for all*’ providing a mix of green and blue infrastructure integrating appropriately into the nature of the established urban fabric. The suggested design approach would retain the sunken character of the dock through a sustainable, modern intervention which would be accessible to all throughout the year whilst incorporating elements of shelter and range of activities which will attract and entice people to visit and remain in the space.
- 3.9 Our client understands the above Urban Scale Interventions is not the only design solution to the use of George’s Dock and would request that Dublin City Council launch a Public Consultation on the future of the dock. This will ensure a fully transparent form of engagement with the public, local businesses, schools and institutions to influence and inform the future use of George’s Dock. It is respectfully submitted that the suggested lido use at the location as written at Material Alteration Reference Number 10.18 requires reconsideration and should be subject to public consultation as part of the planning and development process.
- 3.10 In our client’s opinion, this will guarantee an equitable and fair approach which will provide a multitude of ideas which has more of an opportunity to result in a popular and successful reuse of George’s Dock which truly benefits the area.
- 3.11 On the basis of the above, CHQ Dublin Ltd seeks the following amendments to materials alteration listed below.

Material Alteration Reference Number 10.18

Chapter 10

Section: 10.5.8 Sport, Recreation and Play

Page: 384, Objective GIO53

Amendment:

Objective GIO53 Water Sports and Leisure Activities

To support the development of a public lido ~~at George’s Dock, and to strive to achieve this within the first three years of the Development Plan being adopted,~~ at an appropriate location within the city, subject to public

consultation, and to provide other water sports and leisure activities in the city centre and at the Liffey, canals and other key water bodies.

4. Conclusions

- 4.1 On behalf of our client, CHQ Dublin Limited, we make this submission in response to the proposed amendments to the draft Dublin City Development Plan 2022-2028.
- 4.2 Our client generally welcomes the policies and objectives set out at Chapter 12 – Culture which will facilitate and consolidate cultural clusters and hubs, including Dublin Docklands. The chq Building and George’s Dock are suitably placed to provide a link between Dublin city centre and the wider Docklands area and our client respectfully submits that effective public use of George’s Dock is vital for long term sustainable growth of the Docklands ‘cultural hub’ and consolidate the role of The chq Building in this regard.
- 4.3 However, it is respectfully submitted that the proposed amendment requiring the provision of a lido at George’s Dock is overly prescriptive be reconsidered. At a minimum, the Plan should make provision for the public consultation on the future use of George’s Dock to allow input on this matter to ensure the optimum use of the area as an integral part of the city.
- 4.4 As suggested by CHQ Dublin Ltd., a high-quality and publicly accessible urban space could be a much more appropriate use and investment in the area which would complement the cultural hub of the Docklands and along the North Quays at The chq Building, the Jeanie Johnson and EPIC. Alternative uses should be considered at George’s Dock.
- 4.5 It is essential that the redevelopment and regeneration of George’s Dock is undertaken in the short term to provide an impetus to the dock which has lain vacant as a detracting feature of the waterfront since 2018. This will ensure the delivery of the greater public good and enhance the Custom House Quay as a destination, building on the success of The chq Building.
- 4.6 Our client respectfully requests that the Planning Authority considers and implements the includes the above suggested amendments to material alterations on the draft Dublin CDP 2022-2028 to help facilitate the proper and sustainable development of the Docklands Cultural Hub and the regeneration of the underutilised George’s Dock.

Yours faithfully,



John Spain Associates