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01/09/2022

Dear Sir, Madam,

Please accept the following observations, on behalf of the Ringsend Community Development Group, for consideration as part of Dublin City Councils public consultation on Development Plan 2022 – 2028 and Material Alterations to the Draft Dublin City Development Plan 2022-2028.

Clarification is sought on the following items contained and stated within the Draft on Development Plan 2022 – 2028.

1. What is meant by Community Infrastructure Audit SDRAs objective QHSNO11, Section 5.5.8 Social and Community Infrastructure - *To carry out and maintain an audit of community infrastructure for Strategic Development and Regeneration Areas, where appropriate*

How will this impact on the existing Z15 zonings in the Ringsend/Irishtown areas.

What are the parameters for the audit

Who is consulted as part of the audit

2. The Ringsend Community Center is zoned Z14. - *Strategic Development & Regeneration Area* and lies within the SDRA boundary. This site should be designated Z15 - Community & Social Infrastructure. Why is this site not designated Z15 - Community & Social Infrastructure?
3. Throughout the draft CDP there are references to the objectives of the Ringsend-Irishtown LEIP and suggestions that integration and interconnectivity, across a number of CDP themes, between Ringsend-Irishtown and the North Lotts and Grand Canal Dock/Poolbeg SDZs can be achieved.

The Ringsend and Irishtown LEIP was completed in 2017, since then, there has been no consultation with the community on delivery of the plans objectives, nor has there been any review of the plan which is now 5 years old. DCC have not provided updates to the community on funding and plans form role out of the LIEP. Full disclosure of the budget and design Plans should eb provided to the community if Ringsedn & Irishtown.

Please provide clarity on DCC intentions to update the plan in light of the significant change to the North Lotts and Grand Canal Dock and Poolbeg SDZs and population increases.

The Ringsend and Irishtown LEIP focuses on Public Realm improvements and **is not a fit for purpose document to replace or be presented as an alternative to/ nor a replacement of, an LAP or Masterplan for the Ringsend and Irishtown area** which is located between the 2 SDZs - North Lotts and Grand Canal Dock and Poolbeg.

The Ringsend Community and Development Group are seeking proactive engagement with DCC on LAP/master planning for the area. At present, the communities of Ringsend and Irishtown find themselves having to reactively engage via the planning system because the CDP zoning and ad hoc speculative nature of planning applications for developments within the area is the only statutory approach to development management at present. This is an ad hoc approach. We need a plan led approach for micro sites within the community, such as community use Z15 and other lands with development potential and critical corridors of connectivity such as Pigeon House Road, Cambridge Road, Ringsend Park, arterial roads and Greenway proposals.

4. Appendix 3 of the Draft CDP reflects the 2018 Urban Development and Building Heights Guidelines for Planning Authorities. Key points from the guidelines include: • Development plans should identify locations where increase height is appropriate/promoted.

The draft CDP makes the following comment in Section Chapter 13: Strategic Development Regeneration Areas (SDRAs) – HEIGHT:

In relation to the SDZs for North Lotts and Grand Canal Dock and Poolbeg West, specific height requirements apply as set out in the Planning Schemes, where heights are set out for individual city blocks or elements within them.

*More generally for the SDRA area (of which Ringsend & Irishtown are located), Ministerial guidance published in 2018 has redefined a planned approach to building heights which is now to be implemented, **and this SDRA has clear locational advantages that support some increased height in appropriate locations**"*

5. The Ringsend Community and Development Group are seeking **clarifications and request DCC to clarify the record in the Draft CDP and any revision/material change to the draft CDP** that the areas referred to as having clear locational advantages that support some increased height in appropriate locations **are those sites (and none other)** listed in the Draft CDP under Chapter 13: Strategic Development Regeneration Areas (SDRAs) - 13.8 SDRA 6 – Docklands: I.e.

Key Opportunity Sites

1 - Connolly Station

2 - Site between 52 Oriel Street Lower, the Royal Canal Greenway and the canal rail bridge

3 - Shamrock Place

4 - Ossory Industrial Estate

5 - Coady's Yard, Ossory Road

6 - North Strand Fire Station/Former Readymix Site

7 - Docklands Innovation Park

- 8 - Chadwick's Yard
- 9 - East Road
- 10 - Castleforbes Business Park
- 11 - Trinity College Innovation District
- 12 - ESB Complex, South Lotts Road
- 13 - George Reynolds House, Oliver Plunkett Avenue
- 14 - Former Power Station and Pigeon House Hotel, Poolbeg

Finally, please note below for reference previous points submitted by the Ringsend Community Development Group, to the Draft Dublin City Development Plan 2022-2028

Signed on behalf of;

The Ringsend Community Development Group

PP

Ali Robinson (committee)

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It should be an objective of the plan to;

- Protect and support the unique character and heritage of maritime and coastal villages
- Deliver statutory Local Area Plan for Ringsend and environs
- Ensure that development within or affecting Dublin's villages does not impact on or affect their character.
- Promote a variety of housing types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces that protects the character of Dublin's villages.
- Recognise, protect & preserve the intrinsic quality of Ringsend Village and environs as an area characterised by low-rise building typologies. Protect & preserve urban villages from over development and inappropriate development heights
- Protect conservation areas, architectural conservation areas and historic & heritage villages of the city.

- Protect the low-rise skyline along the South Quays at York Road and Pigeon House Road to ensure the maritime character of the river Liffey waterway is preserved and transitions along this skyline are not abrupt and/or interrupted by inappropriate development, in order to preserve the waterway as an *entrance* to the City and Docklands SDZ, which specifically provides for increases in height of mid-rise and taller buildings
- Prevent visual clutter or cumulative negative visual disruption of the skyline along the river Liffey and Quays
- Protect maritime and coastal villages from over development
- Promote biodiversity and indigenous species in all planting schemes
- Prevent dereliction affecting Dublin's villages and to promote the appropriate sustainable re-development of vacant and brownfield lands in a manner that protects their character.
- Deliver greater share of multi modal transport options other than cars and deliver cycleways, urban greenways and fit for purpose pedestrian walkways to promote carbon-neutral sustainable communities throughout the city
- Increase measures for greening of the city to reduce carbon dioxide in the atmosphere, help adapt the environment to climate change, and encourage reduced motor vehicle usage and more sustainable travel modes
- Develop and deliver a sustainable network of safe, clean, attractive pedestrian routes, lanes and cycleways in urban and coastal villages
- Protect and enhance important views and corridors into and out of Dublin City along the river Liffey and York Road/Pigeon House Road to preserve the unique maritime character of the area and to protect existing maritime landmarks, coastal villages and their prominence.
- Protect coastal village landscapes, including riverscapes, canals and the wider Liffey estuary
- Protect and enhance important Natura sites & waterbodies such as the River Dodder, the Grand Canal Basin and confluence of the river Liffey & the river Dodder which combine as an area of natural beauty and biodiversity, under the European Union Water Framework Directive 2000 & Habitats Directive, to provide a strengthened system for the protection and improvement of these water courses, water bodies and water-dependent ecosystems
- Recognise the distinctive character of Ringsend village and environs and coastal villages and to work with the relevant authorities to preserve the unique maritime character and heritage of Ringsend and the cities coastal villages.
- Recognise the important national and regional role of Dublin Port in the unique heritage of the city and region and to protect sensitive areas and coastal villages from social and cultural decline.
- Ensure residential development is at sustainable urban densities in coastal villages having regard to the need for high standards of urban design and architecture, DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Delivering Homes Sustaining Communities – Statement on Housing Policy' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2015) and 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009) and to successfully integrate with the character of the surrounding area.
- Ensure that new housing development close to existing houses has regard to, and does not affect the character and scale of the existing houses of the area.
- Ensure the transformation of the key regeneration areas including the Docklands and Poolbeg do not negatively impact on the unique character, culture, built heritage, environment and identity of Ringsend Village and environs.

- Improve access to information on vacant land in the city, including details such as location, area, zoning etc. via appropriate media/online resources, and the keeping of a public register as a basis of a public dialogue in the public interest.
- Improve access to information on variations to existing plans & zoning objectives in the city and Villages
- Recognise the unique importance of Ringsend Village as a maritime & Port village, its history and culture and to ensure its protection, renewal and enhancement, in co-operation with the Ringsend Community Development Group.
- Ensure the proposed bus corridor, pedestrian/cyclist bridge over the Dodder from Capital Docks to Thorncastle Street does not allow for inclusion of cars/trucks and delivers an improved environment for walking and cycling through the implementation of improvements to linked thoroughfares and junctions and also through the development of new and safe routes, within Ringsend Village and environs and along York Road, Cambridge Road and Pigeon House Road.
- Ensure the proposed Bus corridor, pedestrian/cyclist bridge over the Dodder from Capital Docks to Thorncastle Street and linked routes within the network will be planned in conjunction with green infrastructure objectives for Ringsend and environs and on foot of the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual.
- Develop a high-quality pedestrian environment as part of the Bray to Howth greenway, along the South Liffey Quay from Sean Moore Road west to the East Link Bridge and consider the needs of pedestrians in the design of all infrastructure projects.
- Ensure the delivery of the Eastern by-pass from existing Dublin Port tunnel to Poolbeg, also referred to as the Southern Port Access Route, and in the longer term to provide a route corridor between Poolbeg and the Southern Cross/ South Eastern Motorway (in accordance with the NTA Strategy for the Greater Dublin Area 2016–2035)
- Protect the Dublin City coastline and coastal villages from flooding (Tidal, coastal, Fluvial, Groundwater and/or storm charge/Sewer overflow flooding)
- Implement effective Litter Management Plans for coastal villages through enforcement of the litter laws, street cleaning and education and awareness campaigns.
- Implement effective Litter Management Plans in and around Natura sites and their environs through enforcement of the litter laws, street cleaning and education and awareness campaigns.
- Ensure new development(s) lighting and external lighting proposals minimises light spillage or pollution on green Open Spaces, Parks and surrounding environments and has due regard to biodiversity and circadian rhythms of biodiversity in these areas.
- Ensure mitigation measures to maintain appropriate differences in day/night light intensities to protect biodiversity against development lighting and external lighting proposals
- Ensure integration of Grand Canal Basin, Ringsend Park and Ringsend Village and environs including into the Dublin City Strategic Green Network of green & blue hubs, areas & corridors to ensure ecological connectivity with Sean Moore Park, Sean O Casey Park and on to Sandymount SAC/SPA and Irishtown Nature reserve, Poolbeg/Shelly banks beaches and deliver green and blue network connectivity and continuity with the wider Dublin Bay biosphere and bring designations to a standard subject to Article 6 Assessment of the Habitats Directive.
- Bring proposed Natura designation to a standard subject to Article 6 Assessment of the Habitats Directive.
- Preserve, protect and enhance the quality of Dublin Bay biosphere.

- Develop key streets in coastal villages for greening by way of higher standards of planting and pedestrian/cycling amenity along key routes whilst at the same time ensuring that ecosystem functions, corridors and existing amenity uses in coastal villages and environs and areas are not compromised and existing biodiversity and heritage is protected and enhanced.
- Protect and improve the unique natural character and ecological value of Grand Canal Basin and river Dodder and the river Liffey and the confluence of these rivers and all rivers within and forming boundaries to the administrative area of Dublin City Council, in accordance with the Eastern River Basin District management plan.
- Seek the designation of Grand Canal Basin and the confluence of the river Dodder with the river Liffey to the mouth of the river Liffey to the East Link Bridge as a Special Amenity Areas and to prepare Special Amenity Area Orders (SAAOs) for same.
- Support and enhance coastal villages by delivering sustainable coastal, estuarine, canal and riverine recreational amenities to enhance appreciation of coastal natural assets in a manner that ensures that any adverse environmental effects are avoided, remedied or mitigated.
- Protect and improve the natural character of watercourses, including the Dodder, and to promote access, walkways, cycleways and other compatible recreational uses along them, having regard to environmental sensitivities.
- Support the implementation of the national Biodiversity Action Plan(s), conserve species, habitats and natural heritage features and protect designated sites.
- Plant more trees and flora in coastal villages in support of amenity, tourism, preservation and enhancement of open/green spaces and support for biodiversity and community well-being of Dublin's villages.
- Protect trees, hedgerows or groups of trees which function as wildlife corridors or 'stepping stones' in accordance with Article 10 of the EU Habitats Directive.
- Ensure development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting.
- Ensure DU018-053 (settlement cluster), DU018-066 (building) DU018-054 (building), DU018-054001 (church) and DU018-054002 (graveyard) are maintained on the National Record of Monuments & Places and as part of Dublin Cities conservation strategy to review the Record of Protected Structures include a continuation of the existing protections afforded to DU019-029002 (sea-wall) AND adopt the entire seawall for inclusion in the RMP to ensure continuity of protection for the entire sea wall structure running parallel to and along Pigeon House Rd and York Road, sections currently not protected, as a structure of historic importance on the Record of Protected Structures as the Quay Wall contributes significantly to the special and unique character of the area, provides continuity of historical, cultural and unique maritime heritage along the river Liffey and, as such, should be considered an essential part of the street/riverscape along this section of the river Liffey. It should be an objective to protect the structure by way of inclusion in the Records of Protected Structures.
- Develop greenways/walking routes along the river Liffey south sea wall to support recreation, amenity and tourism for coastal villages.
- Develop a long-term management plan to promote the conservation, management and interpretation of archaeological sites and monuments in the city's coastal villages
- Develop a maritime heritage quarter including Ringsend and environs creating an integrated historic, literary and cultural focus for the area to provide potential for tourism and to
- promote the awareness of the unique maritime heritage of Ringsend Village and environs.

- Promote the awareness of the unique literary connection to James Joyce's Ulysses and connections with Ringsend Village and environs

Signed on behalf of;

The Ringsend Community Development Group

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